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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
The Honorable Deadra L. Jefferson, Circuit Court Judge

DEC 07 2015

SC Court of Appeals

Case No. 2014-CP-08-1840

BP Amoco Chemical Company.....Plaintiff/Appellant,

v.

City of Charleston; Tract 7, LLC; Cainhoy Land & Timber, LLC; and Southern Timber, LLC.....Defendants,

Of whom City of Charleston and Tract 7, LLC are the..... Respondents.

**NOTICE OF APPEAL**

BP Amoco Chemical Company ("Appellant"), appeals the Order of the Honorable Deadra L. Jefferson dated October 22, 2015 (the "Order"), and the form Order dated October 22, 2015 (the "Form Order"), which granted a Motion for Summary Judgment filed by the City of Charleston and Partial Summary Judgment on a Motion for Summary Judgment filed by Tract 7, LLC ("Respondents"). Appellant received written notice of the entry of the Final Order on November 3, 2015.

December 3, 2015



Douglas M. Muller, Esquire  
E. Brandon Gaskins, Esquire  
Moore & Van Allen PLLC  
78 Wentworth Street (29401)  
P.O. Box 22828  
Charleston, SC 29413-2828  
(843) 579-7000 - telephone  
(843) 579-7099 – facsimile

Attorneys for Appellant BP Amoco  
Chemical Company

Other Counsel of Record:

Frances I. Cantwell, Esquire  
Charlton de Saussure, Jr., Esquire  
50 Broad Street  
Charleston, South Carolina 29401  
(843) 724-3730 – telephone  
(843) 724-3706 - facsimile

Attorneys for the Respondent City of Charleston

M. Dawes Cooke, Jr., Esquire  
D. Summers Clarke, II, Esquire  
Barnwell Whaley Patterson & Helms, LLC  
288 Meeting Street, Suite 200  
Charleston, South Carolina 29402  
(843) 577-7700 - telephone  
(843) 577-7708 - facsimile

Attorneys for the Respondent Defendant Tract 7, LLC, and  
Defendants Cainhoy Land & Timber, LLC; and Southern Timber, LLC

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**PROOF OF SERVICE**

This is to certify that I have this day served counsel for the Defendants and Respondents in the foregoing matter with a copy of the foregoing *Notice of Appeal* by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

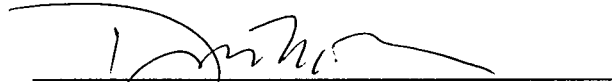
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Charlton de Saussure, Jr., Esquire  
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Barnwell Whaley Patterson & Helms, LLC  
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Defendants Cainhoy Land & Timber, LLC; and Southern Timber, LLC

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Moore & Van Allen PLLC  
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(843) 579-7099 - facsimile

Attorneys for Appellant BP Amoco  
Chemical Company

**Moore & Van Allen**

December 3, 2015

The Honorable Mary P. Brown  
Berkeley County Clerk of Court  
300-B California Drive  
Moncks Corner, SC 29461

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Douglas M. Muller.  
Attorney at Law

T 843 579 7032  
F 843 579 8719  
dougsmuller@mvalaw.com

Moore & Van Allen PLLC

78 Wentworth St.  
Charleston, SC 29401-1428

Mailing Address:  
Post Office Box 22828  
Charleston, SC 29413-2828

**Re: BP Amoco Chemical Company v. City of Charleston, et al.**  
**Case No. 2014-CP-08-1840**  
**MVA file No. 039124.2**

Dear Ms. Brown:

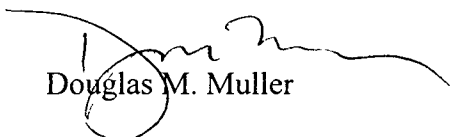
Enclosed for filing please find the original and one (1) copy of a Notice of Appeal in the above referenced matter. Please file the original and return a file stamped copy in the self-addressed envelope provided.

By copy of this letter, I am serving all counsel of record with a copy of the same.

Thank you for your assistance in this matter.

Sincerely,

Moore & Van Allen PLLC

  
Douglas M. Muller

DMM/ws

Enclosures: as stated

cc: Frances I. Cantwell, Esquire  
Charlton de Saussure, Jr., Esquire  
M. Dawes Cooke, Jr., Esquire  
D. Summers Clarke, II, Esquire  
South Carolina Court of Appeals

Charlotte, NC  
Research Triangle Park, NC  
Charleston, SC

December 3, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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SC Court of Appeals

Douglas M. Muller.  
Attorney at Law

T 843 579 7032  
F 843 579 8719  
dougsmuller@mvalaw.com

Moore & Van Allen PLLC

78 Wentworth St.  
Charleston, SC 29401-1428

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Post Office Box 22828  
Charleston, SC 29413-2828

**Re: BP Amoco Chemical Company v. City of Charleston, et al.  
Lower Court Case No. 2014-CP-08-1840  
MVA file No. 039124.2**

Dear Ms. Kitchings:

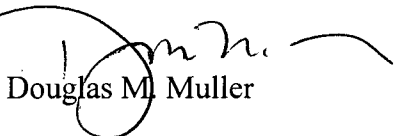
Enclosed for filing please find the original and one (1) copy of a Notice of Appeal in the above referenced matter, together with a copy of the Order and the Form Order being challenged, a copy of the e-mail notification from the Clerk's office, Proof of Service, and our firm check in the amount of \$100.00 for the requisite filing fee. Please file the original Notice and return a file stamped copy in the stamped, self-addressed envelope provided.

I am filing a copy of the Notice and this letter with the Berkeley County Clerk of Court and, by copy of this letter, I am serving all counsel of record with a copy of the same.

Thank you for your assistance in this matter.

Sincerely,

Moore & Van Allen PLLC



Douglas M. Muller

DMM/ws

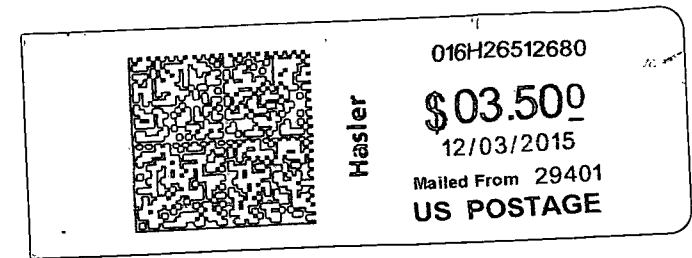
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cc: Frances I. Cantwell, Esquire  
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