

78420

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

JAN 14 2016

SC Court of Appeals

Tanya A. Gee, Circuit Court Judge

Case No. 2015-CP-32-00170

Joseph W. Owens,

Appellant,

v.

Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley,  
Boyd J. Jones, Tommy G. Parler, Eric L. Fowler,  
Dennis Tyndall, Ashley S. Hunter and McKay  
Public Affairs, LLC,

Defendants,

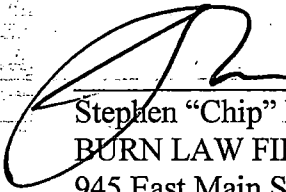
Of whom Temus C. Miles, Jr., B.J. Unthank, L. Dale  
Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler  
and Dennis Tyndall are Respondents.

NOTICE OF APPEAL

Joseph W. Owens appeals the order of the Honorable Tanya A. Gee dated  
December 1, 2015, which found for Respondents. Counsel for Appellant received  
written notice of the entry of the order on December 18, 2015.

SIGNATURE PAGE TO FOLLOW

January 6, 2016



Stephen "Chip" Burn, Esquire  
BURN LAW FIRM, LLC  
945 East Main Street, Ste. D  
Lexington, SC 29072  
Phone (803) 358-7220  
Fax (888) 791-2057  
Attorney for Appellant

Other Counsel of Record:

Andrew F. Lindemann, Esquire  
Davidson & Lindemann, PA  
Post Office Box 8568  
Columbia, SC 29202-8568  
(803) 806-8222  
Attorney for Appellant

David Allen Anderson, Esquire  
Richardson Plowden & Robinson, PA  
Post Office Drawer 7788  
Columbia, SC 29202  
(803) 576-3702

Attorney for Respondents Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler and Dennis Tyndall

Robert Frederick Goings, Esquire  
Goings Law Firm, LLC  
Post Office Box 436  
Columbia, SC 29202  
(803) 350-9230  
Attorney for Respondent Temus C. Miles, Jr.

Graham L. Newman, Esquire  
Chappell Smith & Arden, PA  
Post Office Box 12330  
Columbia, SC 29211  
(803) 929-3600  
Attorney for Defendant Ashley S. Hunter

Damon Christian Wlodarczyk, Esquire  
Riley Pope & Laney, LLC  
Post Office Box 11412  
Columbia, SC 29211  
(803) 799-9993  
Attorney for Defendant McKay Public Affairs, LLC

Post Office Box 11412

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

JAN 14 2016

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Tanya A. Gee, Circuit Court Judge

Case No. 2015-CP-32-00170

Joseph W. Owens,

Appellant,

v.

Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley,  
Boyd J. Jones, Tommy G. Parler, Eric L. Fowler,  
Dennis Tyndall, Ashley S. Hunter and McKay  
Public Affairs, LLC,

Defendants,

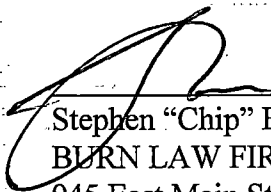
Of whom Temus C. Miles, Jr., B.J. Unthank, L. Dale  
Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler  
and Dennis Tyndall are Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Respondents Temus C. Miles, Jr., B.J. Unthank, L. Dale Harley, Boyd J. Jones, Tommy G. Parler, Eric L. Fowler and Dennis Tyndall, by depositing a copy of it in the United States Mail, postage prepaid, on January 6, 2016, addressed to their attorneys of record, David Allen Anderson, Richardson Plowden & Robinson, PA, Post Office Drawer 7788, Columbia, South Carolina 29202, and Robert Frederick Goings, Goings Law Firm, LLC, Post Office Box 436, Columbia, South Carolina 29202.

**SIGNATURE PAGE TO FOLLOW**

January 6, 2016



---

Stephen "Chip" Burn, Esquire  
BURN LAW FIRM, LLC  
945 East Main Street, Ste. D  
Lexington, SC 29072  
Phone (803) 358-7220  
Fax (888) 791-2057  
Attorney for Appellant



**BURN**  
**LAW FIRM, LLC**

Stephen "Chip" Burn  
cburn@burnlawfirmllc.com

January 11, 2016

**RECEIVED**

JAN 14 2016

**SC Court of Appeals**

**VIA FIRST-CLASS MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**Re: Joseph W. Owens v. Temus C. Miles, Jr., et al.**  
**Civil Action No.: 2015-CP-32-00170**  
**Our File No.: 14034**

Dear Ms. Kitchings:

Enclosed for filing is a notice of appeal in the above-referenced case. Also enclosed are the following:

- 1) Proof of service of the notice of appeal on the respondents.
- 2) A copy of the order which is to be challenged on appeal.
- 3) A filing fee of \$100.00.

Thank you for your assistance in this matter. Please feel free to contact me should you have any questions or concerns.

Sincerely yours,

Stephen "Chip" Burn

Enclosures

cc: Andrew Lindemann, Esquire (w/ enclosures via first-class mail)  
David A. Anderson, Esquire (w/enclosures via first-class mail)  
Robert F. Goings, Esquire (w/enclosures via first-class mail)  
Graham L. Newman, Esquire (w/enclosures via first-class mail)  
Damon C. Wlodarczyk, Esquire (w/enclosures via first-class mail)



**BURN**  
**LAW FIRM, LLC**

945 East Main Street, Suite D  
Lexington, SC 29072

\$0.92<sup>5</sup>  
US POSTAGE  
FIRST-CLASS



071S01039663  
29072  
000001041

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

JAN 14 2016

SC Court of Appeals

2921131629 8012

