

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Tanya A. Gee, Circuit Court Judge

Case No. 2015-CP-40-01082

RECEIVED

FEB 22 2016

SC Court of Appeals

Karl T. Harbath, Respondent;

v.

Stephen Sanders, Bennett-Hall Co., Inc.,
and Sunbelt Rentals, Inc., Defendants,

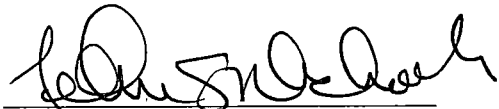
Of whom

Bennett-Hall Co., Inc. is the, Appellant.

NOTICE OF APPEARANCE

Attorney John Nichols respectfully requests that this Court note his appearance as additional counsel of record for the Respondent. As the Court is aware, attorney Melissa G. Mosier remains counsel of record. See Rule 264, SCACR; see also *Ex parte Strom*, 343 S.C. 257, 539 S.E.2d 699 (2000).

Respectfully Submitted, .



John S. Nichols, SC Bar # 4210
BLUESTEIN NICHOLS
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February 22, 2016

Attorney for Respondent

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Appellant with a copy of the *Notice of Appearance, Motion to Accept
Memorandum Out of Time*, and the conditionally filed *Memorandum of Law Regarding
Appealability* by mailing copies of the same by electronic mail and hand delivery to the
following address:

Brian A. Comer
Kerri B. Rupert
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Columbia, SC 29201
bcomer@collinsandlacy.com
krupert@collinsandlacy.com

Erin Bridges

Erin Bridges

February 22, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Karl T. Harbath v. Stephen Sanders
Case Tracking No.: 2015-002566

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of a Notice of Appearance in reference to the above matter. Also enclosed please find the original and seven (7) copies of the Motion for the Court to Accept the Memorandum Out of Time and the conditionally filed Memorandum of Law Regarding Appealability. I have also enclosed a proof of service of these documents on counsel for the Appellant, and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Melissa G. Mosier, Esquire
Brian A. Comer, Esquire
Kerri B. Rupert, Esquire