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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Doyet A. Early, Circuit Court Judge

Case No. 2014-CP-40-6297

RECEIVED

APR 05 2016

SC Court of Appeals

Do Yeon Kim,

v. Appellant,

County of Richland, Richland County
Sheriff's Department and Leon Lott in his
Official Capacity as Richland County
Sherriff.

Respondents.

NOTICE OF APPEAL

Do Yeon Kim appeals the following rulings and Orders of the Honorable Doyet A. Early from a trial held on January 20 and 21, 2016:

- Ruling at trial to exclude one of Plaintiff's witnesses who was previously disclosed in discovery and with whom Defense Counsel had spoken with the week before trial on the ground that the witness was not timely disclosed in discovery;
- Ruling at trial to allow the testimony of Leon Lott when Leon Lott was never disclosed as a witness prior to trial;
- Ruling at trial to exclude some of Plaintiff's medical bills/receipts;
- Ruling at trial to exclude written evidence (TR-310 accident report) that should not have been excluded based on applicable statutory law and the applicable Rules of Evidence;
- Ruling at trial denying Plaintiff's Motion for a directed verdict on liability;
- Ruling at trial and charge to the jury on application of S.C. Code Ann 56-5-760 when the evidence at trial did not support charging the jury on this code section.

This appeal is also taken from the written Order by the Honorable Doyet A. Early dated March 7, 2016 which granted in part and denied in part appellant's post trial motions (Notice of Motion and Motion for New Trial Nisi Additur or in the Alternative Judgment Notwithstanding

the Verdict or in the Alternative a New Trial; Motion for Costs and Translator's Fees). Appellant received written notice of entry of the Order on March 9, 2016.

April 5, 2016



Robert D. Dodson, Esquire
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Attorney for Appellant

Other Counsel for *Respondents*:

Robert Garfield, Esquire
Todd Flippin, Esquire
Davidson & Lindemann, PA
1611 Devonshire Drive, 2nd Floor
Post Office Box 8568
Columbia, SC 29202

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SC Court of Appeals

County of Richland, Richland County Sheriff's Department and Leon Lott in his Official
Capacity as Richland County Sheriff..... Respondents

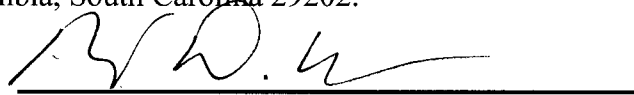
v.

Do Yeon Kim..... Appellant

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Respondents the County of Richland, Richland County Sheriff's Department and Leon Lott in his Official Capacity as Richland County Sheriff by depositing a copy of it in the United States Mail, postage prepaid, on April 6, 2016, addressed to their attorneys of record, Robert Garfield and Todd Flippin of Davidson & Lindemann, PA at Post Office Box 8658, Columbia, South Carolina 29202.

April 5, 2016



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SC Court of Appeals

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

RE: Do Yeon Kim v. County of Richland, Richland County Sheriff's Department and
Leon Lott in his Official Capacity as Richland County Sheriff, Case No. 2014-
CP-40-6297

Dear Ms. Kitchings:

Enclosed for filing is a notice of appeal in the above 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 challenged on appeal; and,
- 3) A filing fee of \$100.00

April 5, 2016

A handwritten signature in black ink, appearing to read "R. D. Dodson", written over a horizontal line.

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