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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2014-CP-16-0792

State Farm Mutual Automobile
Insurance Company, Respondent,

v.

Beverly Goyeneche, David R. Gray, III,
and Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray),
individually and as Parent and Natural Guardian of S.G., Defendants,

of whom

Beverly Goyeneche and Amanda
Goyeneche are Appellants.

NOTICE OF APPEAL

Beverly Goyeneche and Amanda Goyeneche appeal the judgment of the Honorable Paul M. Burch, and also from the order denying their motion to alter, amend, or reconsider that judgment. The judgment is dated June 1, 2015, and was filed June 8th. Defendants filed a motion for reconsideration which Judge Burch denied in a written order dated March 17, 2016 and filed March 23, 2016. Appellants received written notice of the entry of this order on March 24, 2016.

April 21, 2016

Respectfully submitted,



John S. Nichols, Bar No. 4210
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Hartsville, SC 29550
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Attorneys for Appellants

Other Counsel of Record:

Jonathan M. Robinson
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PO Drawer 39
Camden, SC 29021-0039
(803) 432-1992

Attorney for Respondent

Paul V. Cannarella
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PO Box 38
Hartsville, SC 29551
(843) 332-0106

Attorney for Defendant David R. Gray, III

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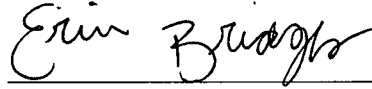
Beverly Goyeneche and Amanda
Goyeneche are Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel with a copy of the *Notice of Appeal* by mailing copies of the same by United
States Mail with first class postage prepaid to the following addresses:

Jonathan M. Robinson
DuBose-Robinson, PC
PO Drawer 39
Camden, SC 29021-0039

Paul V. Cannarella
Paul V. Cannarella, PA, Attorney at Law
PO Box 38
Hartsville, SC 29551



Erin Bridges
Paralegal
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC

April 21, 2016
Columbia, South Carolina



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SC Court of Appeals

VIA HAND DELIVERY

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

RE: State Farm Mutual Automobile Insurance Company v. Goyeneche et. al.
Case No.: 2014-CP-16-0792

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of a Notice of Appeal in this case. I have also enclosed the following:

- 1.) Proof of service of the notice of appeal on the respondent;
- 2.) A copy of the orders which are to be challenged on appeal;
- 3.) A filing fee of \$100.00.

Please return the additional filed copy to me via our courier. Thank you in advance for your attention to this matter.

Sincerely,

John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

JSN:emb

Enclosures

cc: Karl H. Smith, Esquire
Jonathan M. Robinson, Esquire
Paul V. Cannarella, Esquire
The Honorable Scott B. Suggs



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

April 21, 2016

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SC Court of Appeals

The Honorable Scott B. Suggs
Darlington County Clerk of Court
1 Public Sq, Rm B4
Darlington, SC 29532-3213

RE: State Farm Mutual Automobile Insurance Company v. Goyeneche et. al.
Case No.: 2014-CP-16-0792

Dear Mr. Suggs:

Please find enclosed for filing a Notice of Appeal and proof of service in reference to the above matter.

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

Sincerely,

John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

JSN:emb

Enclosures

cc: Karl H. Smith, Esquire
Jonathan M. Robinson, Esquire
Paul V. Cannarella, Esquire
The Honorable Jenny A. Kitchings