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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity

**RECEIVED**  
JUL 08 2016  
SC Court of Appeals

Case No. 2007-CP-40-7633

Carolina Chloride, Inc., .....Appellant,

v.

South Carolina Department of Transportation, .....Respondent.

**NOTICE OF APPEAL**

TO: BEACHAM O. BROOKER, JR., ESQUIRE, AND NATALIE J.  
MOORE, ESQUIRE, COUNSEL FOR RESPONDENT:

Carolina Chloride, Inc., through its undersigned counsel, appeals the following orders:

- Order (filed Janaury 25, 2016); and
- Order on Plaintiff's Rule 59 Motion (filed Jun 6, 2016).

The undersigned counsel for Appellant Carolina Chloride, Inc. received written notice of the entry of the Order on Plaintiff's Rule 59 Motion on June 22, 2016, which is the trigger date for the instant appeal.

Respectfully submitted,  
COLLINS & LACY, P.C.



By:

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CHRISTIAN STEGMAIER  
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Columbia, South Carolina 29211  
(803) 256-2660 (voice)  
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And:

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ATTORNEYS FOR APPELLANT

NOTICE OF APPEAL

Columbia, South Carolina  
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**PROOF OF SERVICE**

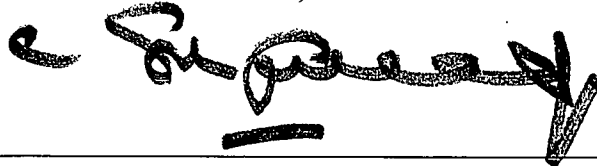
I hereby certify that I served the Notice of Appeal upon all parties and the lower court, by placing a copy in the United States mail, postage prepaid, to the below listed parties on July 8, 2016, addressed to the following:

Beacham O. Brooker, Jr.  
South Carolina Department of  
Transportation  
Post Office Box 191  
Columbia, SC 29202-0191  
*Counsel for Respondent*

Edward D. Sullivan  
SULLIVAN LAW FIRM, PC  
[esullivan@esullivanlaw.com](mailto:esullivan@esullivanlaw.com)  
Post Office Box 11714  
Columbia, South Carolina 29211  
*Co-counsel for Appellant*

The Honorable Jeanette W. McBride  
Richland County Clerk of Court  
Post Office Box 2766  
Columbia, SC 29202

Respectfully submitted,  
COLLINS & LACY, P.C.



By: \_\_\_\_\_

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ATTORNEYS FOR APPELLANT

Columbia, South Carolina  
July 8, 2016



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

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SC Court of Appeals

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**VIA HAND DELIVERY**

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

**Re: Carolina Chloride, Inc. v. South Carolina Department of Transportation**  
**Civil Action No. 2007-CP-40-7633**  
**C&L File No. 001114-00102**

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of Carolina Chloride, Inc.'s Notice of Appeal in the above-referenced matter. We are also enclosing copies of the orders that are the basis for the appeal and a check in the amount of \$100.00 for the required filing fee. Please return a filed, stamped copy of the Notice of Appeal to us via our courier.

By copy of this letter, a copy of same is being forwarded to The Honorable Jeanette W. McBride, Richland County Clerk of Court, for filing and a copy is also being forwarded for service upon all counsel.

Thank you for your time and attention. Should you have any questions, please do not hesitate to contact us.

Respectfully,

Christian Stegmaier

CS/mmm

Enclosures

- cc: Beacham O. Brooker, Jr., Esquire
- The Honorable Jeanette W. McBride, Richland County Clerk of Court
- Edward D Sullivan, Esquire
- Robert H. Morgan