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AUG 25 2016
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY

R. Knox McMahon, Presiding Judge, First Judicial Circuit

Case No. 2016-CP-18-00604

Heather Southard,

Respondent,

v.

Joyce Hagan Owens,

Appellant.

NOTICE OF APPEAL

Appellant Joyce Hagan Owens, by and through her undersigned counsel, hereby appeals the Form 4 order of The Honorable R. Knox McMahon, Circuit Judge, filed August 3, 2016, which affirmed the decision of the Magistrate Court. Appellant received notice of the order on August 5, 2016.

Appellant posits that the service of this *Notice of Appeal* shall act to automatically stay the matters decided in the aforementioned order and to automatically stay the relief set forth in said order, and that such automatic stay shall continue in effect for the duration of the appeal. Rule 241(a), SCACR.

[SIGNATURE PAGE FOLLOWS]

Heather Southard v. Joyce Hagan Owens
Case No. 2016-CP-18-00604
NOTICE OF APPEAL

Respectfully submitted,



Sean A. O'Connor (SC Bar No. 68382)

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August 18, 2016

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY

R. Knox McMahon, Presiding Judge, First Judicial Circuit

Case No. 2016-CP-18-00604

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AUG 25 2016

SC Court of Appeals

Heather Southard,

Respondent,

v.

Joyce Hagan Owens,


Appellant.

CERTIFICATE OF SERVICE

The undersigned hereby states that on the 22nd day of August, 2016, she caused a true and correct copy of the *Notice Of Appeal* in the above-captioned matter to be served upon all interested Parties by having the same deposited in the United States mail, proper postage affixed, addressed as follows:

Heather Southard
735 W. Westchester Drive
Charleston, SC 29414
Respondent

Respectfully submitted,


Malena A. Dinwoodie
Litigation Paralegal
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August 22, 2016

FINKEL LAW FIRM LLC

MALENA A. DINWOODIE, PARALEGAL
MDINWOODIE@FINKELLLAW.COM

REPLY TO:
CHARLESTON LITIGATION

August 22, 2016

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

AUG 25 2016

SC Court of Appeals

Re: *Heather Southard v. Joyce Hagan Owens*
Case No.: 2016CP1800604
Our File No. 78225.50598

Dear Ms. Kitchings:

Enclosed for filing, please find a *Notice of Appeal* in regards to the above captioned matter. I have attached a copy of the filed *Form 4* and *Order* from which the Appellant is appealing. Also enclosed is an accompanying *Certificate of Service* affirming that the *Notice of Appeal* has been served on the Respondent, who is also copied on this correspondence. Finally, check numbered 61602 is included as payment for the filing fee.

If you have any questions or concerns, please feel free to contact our office.

With kind personal regards, we are,

Yours very truly,



Malena A. Dinwoodie
Litigation Paralegal

SAO:mad
Enclosures

Cc: Heather Southard (w/ encl.)

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