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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SEP 15 2016

APPEAL FROM YORK COUNTY
S. JACKSON KIMBALL, SPECIAL CIRCUIT COURT JUDGE SC Court of Appeals
Case No. 2015-CP-46-01409

IN RE:

Deborah Dereede Living Trust dated
December 18, 2013

Hugh Dereede and Tyre Dealer Network
Consultants, Inc.,

Respondents.

v.

Courtney Feeley Karp, Individually and
As Trustee of the Deborah Dereede Living
Trust dated December 19, 2013 and Michael
Fehily, as a qualified beneficiary of the
Deborah Dereede Living Trust dated
December 18, 2013,

Defendants,

Of which

Courtney Feeley Karp, Individually and
As trustee of the Deborah Dereede Living
Trust dated December 19, 2013 is,

Appellant.

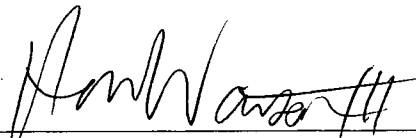
NOTICE OF APPEAL

Appellant Courtney Feeley Karp, individually and as Trustee of the Deborah
Dereede Living Trust dated December 19, 2013 (hereafter "Trustee") appeals from the orders of

the Honorable S. Jackson Kimball dated June 9, 2016, a filed copy of which was received by counsel for Trustee on or about June 16, 2016, and the order dated September 12, 2016, a copy of which was received by counsel for Trustee on or about September 12, 2016.

Copies of both orders are attached hereto and incorporated by reference as a part of this Notice of Appeal.

Respectfully submitted,



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852 Gold Hill Road, Suite 201
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thomas@nosaljeterlaw.com

ATTORNEYS FOR DEFENDANT
COURTNEY FEELEY KARP, individually
And as TRUSTEE OF THE LIVING
TRUST OF DEBORAH DEREDE
DATED DECEMBER 18, 2013

September 14, 2016

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY
S. JACKSON KIMBALL, SPECIAL CIRCUIT COURT JUDGE
Case No. 2015-CP-46-01409

IN RE:

Deborah Dereede Living Trust dated
December 18, 2013

Hugh Dereede and Tyre Dealer Network
Consultants, Inc.,

Respondents.

v.

Courtney Feeley Karp, Individually and
As Trustee of the Deborah Dereede Living
Trust dated December 19, 2013 and Michael
Fehily, as a qualified beneficiary of the
Deborah Dereede Living Trust dated
December 18, 2013,

Defendants,

Of which

Courtney Feeley Karp, Individually and
As trustee of the Deborah Dereede Living
Trust dated December 19, 2013 is,

Appellant.

CERTIFICATE OF SERVICE

I, Beth Cogan, an employee with Ballard & Watson, Attorneys at Law, do hereby
certify that on September 14, 2016, I served a copy of the **Notice of Appeal** in the above-

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SC Court of Appeals


captioned case on the following individuals by United States Mail, with sufficient first-class postage affixed, addressed as follows:

**The Honorable David Hamilton
York County Clerk of Court
Post Office Box 649
York, South Carolina 29745**

**John Gettys, Jr., Esquire
Daniel Ballou, Esquire
Morton & Gettys, LLC
Post Office Box 707
Rock Hill, South Carolina 29731**

**Daniel Harshaw, Esquire
Bradford & Harshaw, P.A.
Post Office Box 977
York, South Carolina 29745**

September 14, 2016
West Columbia, South Carolina


Beth Cogan, Paralegal



Ballard & Watson
Attorneys at Law
PERSISTENT UNWAVERING

Desa Ballard
Harvey M. Watson III

Post Office Box 6338 | West Columbia, SC 29171
226 State Street | West Columbia, SC 29169
ph. 803.796.9299 | fx. 803.796.1066 | desaballard.com

September 1, 2016

Via U.S. Mail and Facsimile (803-256-1999)

Lisa F. Huffman
Garber Reporting Service
Post Office Box 12348
Columbia, South Carolina 29211

Re: *Deborah Dereed Living Trust, et al. v. Feeley Karp, et al.*
Case No: 2015-CP-46-1409

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SC Court of Appeals

Dear Ms. Huffman:

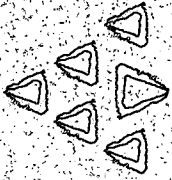
This letter is to formally request a copy of the transcript in regards to the August 24, 2016 hearing held in York County before the Honorable Jack Kimball, as our firm represents Ms. Feeley Karp. Please mail the transcript along with an invoice to the above address.

If you require payment in advance, please contact me as soon as possible, so I can make arrangements. Also, if you would please call me at (803) 796-9299 or e-mail me at the address below and let me know the approximate date that we can expect to receive the transcript. I appreciate your assistance with this matter. With warm personal regards, I am,

Sincerely yours,

Beth Cogan, Paralegal
beth@desaballard.com

cc: Via Email
Thomas Jeter III, Esquire
Pete J. Nosal, Esquire
Courtney Feeley Karp, Esquire



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M. Watson III

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September 14, 2016

Via U.S. Mail

The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals Clerk of Court
1205 Pendleton Street
Columbia, South Carolina 29201

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SEP 15 2016

SC Court of Appeals

Re: *Deborah Dereede Living Trust, et al. v. Feeley Karp, et al.*
Case No.: 2015-CP-46-1409

Dear Ms. Kitchings:

Enclosed for filing with your office, please find the original and two copies of the Notice of Appeal and Proof of Service for the above-referenced matter, along with a check in the amount of \$100.00 for the associated filing fee. Please file the original and return the clocked-in copies in the self-addressed, stamped envelope enclosed.

Additionally, a letter was sent previously to the court reporter requesting the transcript for the hearing on the Motion for Reconsideration, a copy of which is attached. We will notify this court and opposing counsel upon receipt of that requested transcript.

By copy of this letter and as evidenced by the Proof of Service, the same has been served upon counsel for the Respondent. Thank you for your time in this matter. If you have any questions please do not hesitate to contact me.

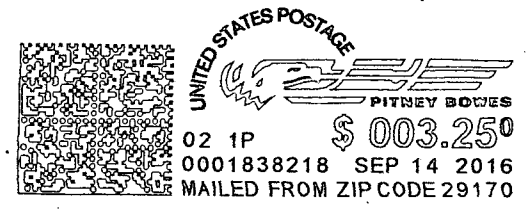
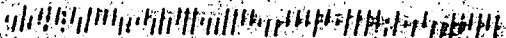
With warm personal regards, I am,

Sincerely yours,

Desa Ballard
desab@desaballard.com

cc: Via U.S. Mail

The Honorable David Hamilton
John Gettys, Jr., Esquire
Daniel Ballou, Esquire
Daniel Harshaw, Esquire
Pete Nosal, Esquire
Thomas Jeter, Esquire
Courtney Feeley Karp (via email)



Law Offices of Desa Ballard

226 State Street
West Columbia, SC 29169

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

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SC Court of Appeals