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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY
S. JACKSON KIMBALL, SPECIAL CIRCUIT COURT JUDGE
Appellate Case No. 2016-001921
Trial Court 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.

SECOND NOTICE OF APPEAL

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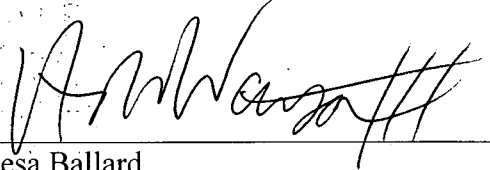
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SC Court of Appeals

Appellant Courtney Feeley Karp, individually and as Trustee of the Deborah Dereede Living Trust dated December 19, 2013 (hereafter "Trustee") appeals from the order of the Honorable S. Jackson Kimball dated November 4, 2016, a unfiled copy of which was received by counsel for Trustee on or about November 4, 2016. A copy of the order on appeal is attached hereto and incorporated by reference as a part of this Notice of Appeal.

This Second Notice of Appeal shall also serve as Notice, as required by the Court's order dated October 3, 2016, that the order of abeyance previously issued may be lifted and a briefing order issued.

Respectfully submitted,



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

November 7, 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 November 7, 2016, I served a copy of the **Second Notice of Appeal** in the

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

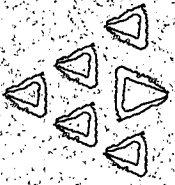
**The Honorable David Hamilton
York County Clerk of Court
Post Office Box 649
York, South Carolina 29745**

**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**

November 7, 2016
West Columbia, South Carolina


Beth Cogan, Paralegal



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M. Watson III

November 7, 2016

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

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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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:

This Court entered an order dated October 3, 2016, holding the above-referenced appeal in abeyance pending the receipt of an anticipated order regarding attorney fees in the underlying action. As directed by this Court's order, please consider this letter as the required notice of the issuance of such an attorney fee order.

Additionally, enclosed for filing with your office are an original and two copies of the **Second Notice of Appeal** and Proof of Service for the above-referenced matter, along with a check in the amount of \$100 for the associated filing fee. Please file the original and return the clocked-in copies in the self-addressed, stamped envelope enclosed. This second notice addresses Appellant's intention of appealing the award of attorney fees order in addition to the order already appealed.

As the abeyance is no longer necessary, and per the usual time periods applicable to an appeal, we have calculated from the date of this notice and correspondence that the Initial Brief of Appellant and Designation of Matter would be due on Wednesday, December 7, 2016. If I am mistaken as to that deadline date, please inform my office as soon as possible, as Appellant is working off that date as the controlling deadline under the SCACR.

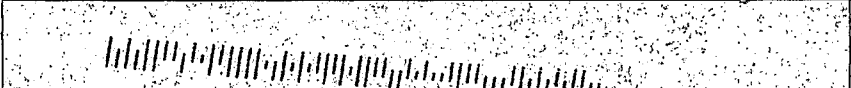
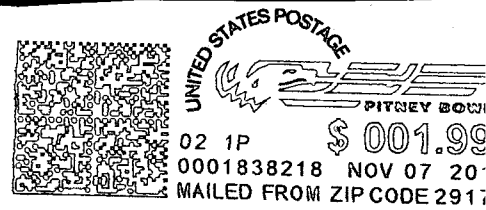
By copy of this letter and its enclosures, as referenced in the Proof of Service enclosed, the same has been served upon counsel for the Respondent. Thank you for your time and attention to this matter. If you have any questions, please do not hesitate to contact me.

With warm personal regards, I am,

Sincerely yours,


Harvey M. Watson III
harvey@desaballard.com

cc: Via U.S. Mail
The Honorable David Hamilton
John Gettys, Jr., Esquire
Daniel Ballou, Esquire
Daniel Harshaw, Esquire
Via Email
Pete Nosal, Esquire
Thomas Jeter, Esquire
Courtney Feeley Karp



BALLARD & WATSON, ATTORNEYS AT LAW
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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