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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JAN 17 2017
SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
COURT OF COMMON PLEAS

R. Knox McMahon, Circuit Court Judge
Civil Action No. 2014-CP-38-01590

Price Oulla and Bonnie Oulla,

Appellants,

vs.

Lisa Velazques, Harbison Community
Association, Inc., Cody Sox, and Patten
Seed Company d/b/a Super-Sod, of which
Patten Seed Company d/b/a Super-Sod is

Respondent.

NOTICE OF APPEAL

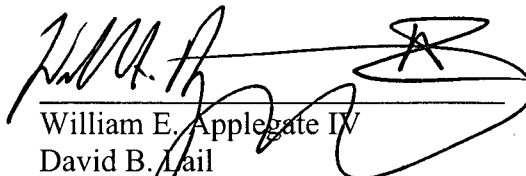
Appellants Price Oulla and Bonnie Oulla respectfully appeal from the order entered on December 2, 2016 denying Appellants' motion to reconsider the order entered on August 2, 2016 granting summary judgment to Respondent Patten Seed Company d/b/a Super-Sod, from which Appellants also appeal. Appellants further appeal from the trial court's failure to rule upon Appellants' motion to amend the complaint, which was filed on June 29, 2016.

Undersigned counsel received written notice of entry of the Order by letter from Respondent's counsel on December 19, 2016.

SIGNATURE OF COUNSEL FOLLOWS ON PAGE 2

Respectfully submitted,

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January 12, 2017

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Patten Seed Company d/b/a Super-Sod

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CONTINUED ON PAGE 3

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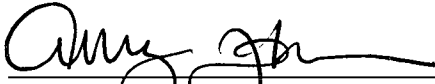
and

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Attorneys for Lisa Velazques

CERTIFICATE OF SERVICE

The undersigned employee of Yarborough Applegate LLC hereby certifies that on January 12th 2017 she served, via first-class U.S. mail, postage paid, copies of the foregoing Notice of Appeal and the orders appealed upon all counsel of record at their respective mailing addresses set forth above.


Amy H. Johnson, Paralegal



**YARBOROUGH
APPLEGATE**

ATTORNEYS AT LAW
January 12, 2017

William E. Applegate IV
william@yarboroughapplegate.com

The Honorable Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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Re: Oulla v. Harbison Community Association, Inc., *et al.*
C/A No. 2014-CP-38-1590
YA File No. 14-057

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Notice of Appeal in the above-referenced case, proof of service as to the Notice of Appeal, a copy of the Order challenged on appeal, as well as a copy of the Order Denying Plaintiffs' Motion to Reconsider. Also enclosed is this firm's check in the amount of \$100.00 for the filing fee. I would appreciate your filing the originals and returning file-stamped copies to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving counsel of record for the Respondent, counsel of record for the other defendants in the underlying case, and the Charleston County Clerk of Court with a copy of the Notice. While I have copied Curtis Dowling as counsel for Harbison Community Association and Cody Sox, those parties have been dismissed with prejudice from the underlying matter, so I believe they do not need to be copied on future pleadings and correspondence related to the appeal. If I am incorrect, I would appreciate your guidance in this regard.

I appreciate your assistance in this matter. Please feel free to contact me if you need additional information or I may otherwise be of assistance.

Sincerely,

Amy H. Johnson,
Paralegal to William E. Applegate IV

Enclosures

cc: E. Raymond Moore, III, Esquire
Curtis W. Dowling, Esquire
Matthew G. Gerrald, Esquire
E. Mitchell Griffith, Esquire
Kelly D. Dean, Esquire
Mark B. Tinsley, Esquire
The Honorable Winnifa Brown-Clark, Orangeburg County Clerk of Court

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