

82403

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM MARION COUNTY
COURT OF COMMON PLEAS

THE HONORABLE THOMAS A. RUSSO
CIRCUIT COURT JUDGE

CIVIL ACTION NO. 2015-CP-33-140

RECEIVED

FEB 06 2017

SC Court of Appeals

Vanessa Blackwell, a/k/a
Jacqueline Blackwell,

RESPONDENT,

versus

Andrew J. Herring, Individually, and as an
employee/agent of Marion County Sheriff's
Department; and Marion County Sheriff's Department,

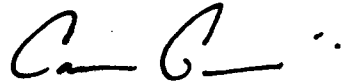
DEFENDANTS,

Of whom Marion County Sheriff's Department is the

APPELLANT.

NOTICE OF APPEAL

The Defendant, Marion County Sheriff's Department, appeals the jury verdict dated September 13, 2016 and filed September 14, 2016, as well as the Order of the Honorable Thomas A. Russo, dated January 10, 2017 and filed January 18, 2017, denying the Defendant's post-trial motions. The Defendant received written notice of the entry of this Order on January 20, 2017.



Douglas C. Baxter
RICHARDSON, PLOWDEN & ROBINSON, PA
2103 Farlow Street (29577)
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(843) 448-1008

Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
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Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR APPELLANT
MARION COUNTY SHERIFF'S
DEPARTMENT**

February 3, 2017.

Other Counsel of Record:

Eric M. Poulin
Roy T. Willey, IV
ANASTOPOULO LAW FIRM, LLC
62 Columbus Street
Charleston, SC 29403
(843) 614-8888
**ATTORNEYS FOR RESPONDENT
VANESSA BLACKWELL, a/k/a
JACQUELINE BLACKWELL**

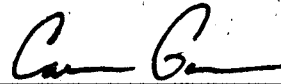
CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Defendant, Marion County Sheriff's Department, do hereby certify that I have this date served the foregoing Notice of Appeal, dated February 3, 2017, and attached Jury Verdict and Order, by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the parties indicated below:

Eric M. Poulin
Roy T. Willey, IV
ANASTOPOULO LAW FIRM, LLC
62 Columbus Street
Charleston, SC 29403
ATTORNEYS FOR RESPONDENT

The Honorable Christy M. Gray
Clerk of Court for Marion County
PO Box 295
Marion, SC 29571

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Carmen V. Ganjehsani
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ATTORNEYS FOR APPELLANT

Date: February 3, 2017.

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

February 3, 2017

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
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SC Court of Appeals

Re: ***Blackwell v. Marion County Sheriff's Department***
Case No.: 2015-CP-33-140
RPR File No.: 149-211

Dear Ms. Kitchings:

Enclosed for filing is the Notice of Appeal of the Defendant, Marion County Sheriff's Department, in the above-referenced case, along with a copy of the Jury Verdict and Order appealed from and our Certificate of Service.

Also enclosed is our firm's check in the amount of \$100.00 for the filing fee in this matter.

By copy of this letter, we are serving this Notice of Appeal on the Clerk of Court for Marion County and counsel for the plaintiff.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,



Carmen V. Ganjehsani

CVG
Enclosures

The Honorable Jenny Abbott Kitchings

February 3, 2017

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cc: The Honorable Christy M. Gray, Marion County Clerk of Court (w/enc.)
Eric M. Poulin, Esquire (w/enc.)
Roy T. Willey, IV, Esquire (w/enc.)
Douglas C. Baxter, (FYI)