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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

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Marvin H. Dukes, III, Master-In-Equity and Special Circuit Court Judge,  
Carmen T. Mullen, Circuit Court Judge

SC Court of Appeals

Case No. 2015-CP-07-1251

Robert E. Feldman and Lois J. Feldman. . . . . Appellants,

vs.

Gary P. Coggin, . . . . . Respondent.

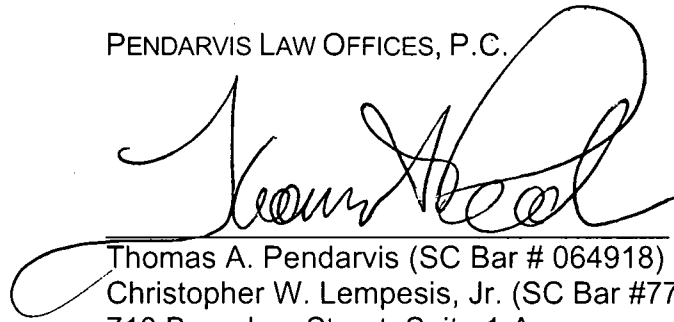
**NOTICE OF APPEAL**

Appellants, Robert E. Feldman and Lois J. Feldman, appeal the following orders:

1. Order Granting Defendant's Motion for Summary Judgment, issued by the Honorable Marvin H. Dukes, III and filed on September 9, 2016, a copy of which is attached as Exhibit 1.
2. Order Denying Motion to Alter or Amend Judgment, issued by the Honorable Marvin H. Dukes, III and filed on January 27, 2017, a copy of which is attached as Exhibit 2.
3. Order declining to issue Order on Motion to Amend Complaint, issued on behalf of the Honorable Carmen T. Mullen via email dated September 22, 2016, a copy of which is attached as Exhibit 3.

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis (SC Bar # 064918)  
Christopher W. Lempesis, Jr. (SC Bar #77012)  
710 Boundary Street, Suite 1-A  
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Counsel for Appellants, Robert E. Feldman and  
Lois J. Feldman

Beaufort, South Carolina

February 8, 2017

OTHER COUNSEL OF RECORD:

M. Dawes Cooke, Jr., J.D.  
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Counsel for Respondent, Gary P. Coggin

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master-In-Equity and Special Circuit Court Judge  
Carmen T. Mullen, Circuit Court Judge

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Case No. 2015-CP-07-1251

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Robert E. Feldman and Lois J. Feldman. . . . . Appellants,

vs.

Gary P. Coggin, . . . . . Respondent.

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**PROOF OF SERVICE**

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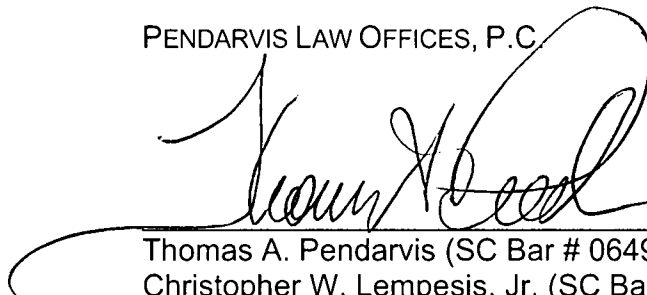
I, Thomas A. Pendarvis, a lawyer with PENDARVIS LAW OFFICES, P.C., certify that I have served one (1) copy of the NOTICE OF APPEAL on counsel for Respondent, by depositing a copy of the same in the United States Mail, postage prepaid, on the 8<sup>th</sup> day of February, 2017 addressed to:

M. Dawes Cooke, Jr., J.D.  
Jeffery M. Bogdan, J.D.  
BARNWELL, WHALEY, PATTERSON & HELMS, LLC  
PO. Drawer H  
Charleston, SC 29402  
[mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)  
[jbogdan@barnwell-whaley.com](mailto:jbogdan@barnwell-whaley.com)

Counsel for Respondent, Gary P. Coggin

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, appearing to read "Thomas A. Pendarvis", written over a horizontal line. The signature is fluid and cursive.

Thomas A. Pendarvis (SC Bar # 064918)  
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Counsel for Appellants, Robert E. Feldman and  
Lois J. Feldman

Beaufort, South Carolina

February 8, 2017

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Thomas A. Pendarvis, J.D.  
Pendarvis Law Offices, P.C.  
710 Boundary Street, Unit A-1  
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**B012**

SHIP TO: The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629



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SC Court of Appeals

PENDARVIS LAW OFFICES, PC



February 8, 2017

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SC Court of Appeals

Jenny A. Kitchings, Clerk of Court  
COURT OF APPEALS FOR THE STATE OF SOUTH CAROLINA  
PO Box 11629  
Columbia, SC 29211

**Re: Robert E. Feldman and Lois J. Feldman vs. Gary P. Coggin  
Civil Action No. 2015-CP-07-1251**

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the following:

1. NOTICE OF APPEAL;
2. PROOF OF SERVICE (of Notice of Appeal);
3. APPELLANTS' MOTION TO REMAND TO COURT OF COMMON PLEAS;
4. APPELLANTS' RULE 240(C)(3) AFFIDAVIT; and
5. PROOF OF SERVICE (of Motion to Remand).

Also enclosed is our firm check in the amount of \$100.00 representing the filing fee.

Please return the clocked copies in the stamped, self-addressed return envelope enclosed for your convenience.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in cursive script that reads "Thomas A. Pendarvis".

Thomas A. Pendarvis

TAP/ses

Enclosures

cc w/encls: M. Dawes Cooke, Jr., J.D.

Jeffery M. Bogdan, J.D.

ec w/encls: Mr. & Mrs. Robert E. Feldman

---

THOMAS A. PENDARVIS, J.D.

Admitted in SC and GA

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by the American Board of  
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843.524.9500

CHRISTOPHER W. LEMPESIS, JR.

Juris Doctor and Master of Laws

[Chris@PendarvisLaw.com](mailto:Chris@PendarvisLaw.com)