

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2016-001266

RECEIVED

APR 07 2017

SC Court of Appeals

PERSONAL CARE, INC. Appellant,

vs.

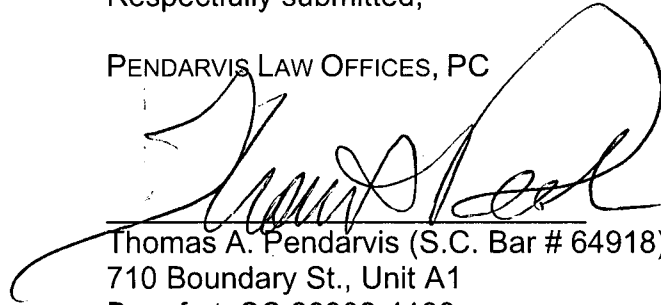
Jerry N. Theos; URICCHIO, HOWE, KRELL,
JOHNSON, TOPOREK THEOS & KEITH, PA;
Cheryl D. Shoun; and TAYLOR, SHOUN,
BOWLEY & BYRD, LLC, Respondents.

**MOTION FOR
AN ORDER OF PROTECTION**

Pursuant to Rule 240, SCACR, counsel for Appellants, Thomas A. Pendarvis, hereby moves this Honorable Court for an order of protection for the period July 26, 2017 through and including August 8, 2017, to allow time for long standing family vacation plans.

Respectfully submitted,

PENDARVIS LAW OFFICES, PC

A handwritten signature in black ink, appearing to read 'Thomas A. Pendarvis', written over a horizontal line.

Thomas A. Pendarvis (S.C. Bar # 64918)

710 Boundary St., Unit A1

Beaufort, SC 29902-4188

(843) 524.9500

Thomas@PendarvisLaw.com

Counsel for Appellants

Beaufort, South Carolina

April 4, 2017

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2013-CP-10-1396

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APR 07 2017

SC Court of Appeals

PERSONAL CARE, INC. Appellant,

vs.

Jerry N. Theos; URICCHIO, HOWE, KRELL,
JOHNSON, TOPOREK THEOS & KEITH, PA;
Cheryl D. Shoun; and TAYLOR, SHOUN,
BOWLEY & BYRD, LLC, Respondents.

PROOF OF SERVICE

I, Thomas A. Pendarvis, a lawyer with PENDARVIS LAW OFFICES, P.C., certify that I have served one (1) copy of the MOTION FOR AN ORDER OF PROTECTION on counsel for Respondents, by depositing a copy of the same in the United States Mail, postage prepaid, on the 3rd day of April, 2017 addressed to:

M. Dawes Cooke, Jr., J.D.
Phillip S. Ferderigos, J.D.
BARNWELL, WHALEY, PATTERSON & HELMS, LLC
PO. Drawer H
Charleston, SC 29402
mdc@barnwell-whaley.com
pferderigos@barnwell-whaley.com

Attorneys for Defendants Jerry N. Theos
and URICCHIO, HOWE, KRELL, JACOBSON,
TOPOREK, THEOS & KEITH, P.A.

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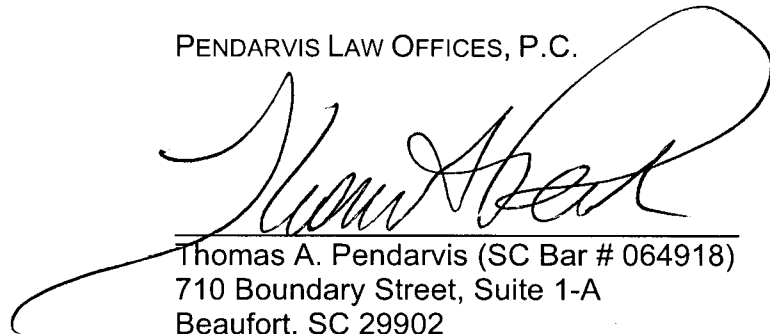
Attorney for Defendant TAYLOR BOWLEY
AND BYRD, LLC

Oana D. Johnson, J.D.
One Carriage Lane
Building H
Charleston, SC 29407
oana@odjlaw.com

Attorney for Defendant TAYLOR BOWLEY
AND BYRD, LLC

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis (SC Bar # 064918)
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Beaufort, SC 29902
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Thomas@PendarvisLaw.com

Counsel for Appellant, PERSONAL CARE, INC.

Beaufort, South Carolina

October 31, 2016

PENDARVIS LAW OFFICES, PC



April 4, 2017

VIA US MAIL

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

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APR 07 2017

SC Court of Appeals

Re: *Personal Care, Inc., v. Jerry N. Theos, et al.*
Appellate Case No.: 2016-001266

Dear Ms. Kitchings:

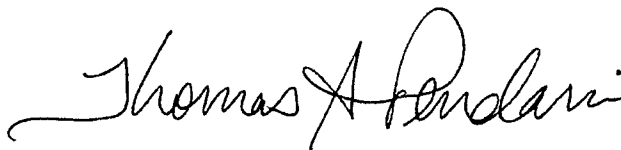
Enclosed for filing please find the original and one copy of the MOTION FOR AN ORDER OF PROTECTION and PROOF OF SERVICE in regard to the above-referenced matter. Also enclosed is a \$25 dollar check representing the filing fee. Please return a clocked copy of each in the postage pre-paid, self-addressed return envelope enclosed for your convenience.

By copy of this letter, I am serving counsel for the Respondents with the same as indicated in the enclosed PROOF OF SERVICE.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis

TAP/ses

Enclosures

cc (w/ enclosures) : M. Dawes Cooke, J.D.
Philip S. Ferderigos, J.D.
Richard A. Farrier, Jr., J.D.
Catherine D. Byrd, J.D.
Amanda K. Dudgeon, J. D.
Oana D. Johnson, J.D.

THOMAS A. PENDARVIS, J.D.

Admitted in SC and GA

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