

STATE OF SOUTH CAROLINA
COURT OF APPEALS

APPEAL FROM SOUTH CAROLINA COURT OF COMMON PLEAS

Honorable Clifton Newman, Circuit Court Judge

and

The Honorable I. Casey Manning

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APR 06 2017

SC Court of Appeals

Case No. 2015-CP-40-00042

Conyers Early Learning CenterAppellant,

v.

Formeicko SmithRespondent.

NOTICE OF APPEAL

Johnny E. Watson, Sr., Esquire
Watso Law Firm
2715 Edgewood Avenue
Columbia, South Carolina 29204
Phone (803) 400-1600
Fax (803) 400-1200

Counsel for Appellant

Jeffrey I. Silverberg, Esquire
Houser, Besley and Newman
1508 Washington
Columbia, South Carolina 29201
Phone (803) 758-6000
Fax (803) 758-4445

Counsel for Respondent

STATEMENT OF ISSUES ON APPEAL

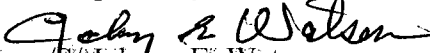
The Appellant, Conyers Early Learning Center, hereby gives notice of appeal from the judgment of the South Carolina Court of Common Pleas, Honorable Clifton Newman, presiding, in the above action.

Notice of Appeal is made subsequent to Order of Judgment signed on March 8, 2017 and filed on March 10, 2017.

Appellant's exceptions to the judgment of the Court of Common Pleas Judge are set forth as follows:

- i. The Trial Judge erred in finding that it was illegal for the Appellant to sell their business to the Respondent; and
- ii. The Trial Judge erred in deciding that the transfer of the business needed the written consent of the South Carolina Department of Social Services.
- iii. The trial judge erred in assessing the Respondent's costs to the Appellant and his attorney for not attending a scheduled deposition appearance when the Appellant, Donna Conyers was too ill to attend the deposition.

Respectfully submitted,


BY: ~~/s/ Johnny E. Watson~~
Johnny E. Watson, Sr.
Attorney at Law, SCB# 5967
P. O. Box 2305 (29202)
2715 Edgewood Avenue
Columbia, South Carolina 29204

(803) 400-1600 Phone

(803) 400-1200 Fax

jewatson.lwr@gmail.com

Columbia, South Carolina

Dated: April 6, 2017

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CERTIFICATE OF SERVICE

I, Johnny E. Watson, of 2715 Edgewood Avenue (29204), P. O. Box 2305, Columbia, South Carolina 29202, hereby certify that I have served the individual named below with a copy of the documents described herein by depositing the documents in the United States mail, postage prepaid and sent the same to them at the addresses listed herein below:

PERSON SERVED:

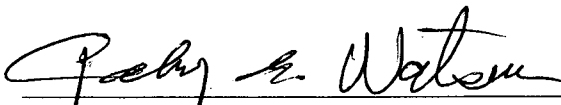
Honorable Jenny Kitching, Clerk
S. C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Jeffrey I. Silverberg, Esquire
Houser, Besley and Newman
1508 Washington
Columbia, South Carolina 29201

DOCUMENT SERVED:

NOTICE OF APPEAL

By:


JOHNNY E. WATSON

Columbia, South Carolina
Date: April 6, 2017