



Nathan A. Earle  
Attorney at Law | Certified Mediator

1541 Wade Hampton Blvd., Suite E  
Greenville, SC 29609

(864) 915-5228  
NATHANEARLE@UPSTATELEGAL.NET

October 18, 2017

South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Earley, et al. v. City of Woodruff, et al.  
[Prior Appellate Case # 2017-001418]

Dear Sir/Madam:

Please find enclosed proof of filing of the Notice of the Appeal in the above-referenced matter with the circuit court.

I can be reached at (864) 915-5228 with any questions about this filing.

Sincerely,

Nathan A. Earle

RECEIVED

OCT 20 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2016-CP-42-03288

Elizabeth Earley, John Earley,  
Lloyd Wilkins, Henry Kerns,  
Marie Mills Kerns, Donna  
Pearson, and Bruce Pearson,

Appellant,

v.

The City of Woodruff, SC,  
and the Terraces at Woodruff, a  
South Carolina Limited Liability  
Company,

Respondent.

**RECEIVED**  
OCT 20 2017  
SC Court of Appeals

**NOTICE OF APPEAL**

Elizabeth Earley, John Earley, Lloyd Wilkins, Henry Kerns, Margie Mills Kerns, Donna Pearson, and Bruce Pearson, appeal the orders of the Honorable J. Derham Cole dated May 24, 2017, and October 5, 2017. The Appellants previously appealed the May 24, 2017 order, Appellate Case # 2017-001418; however, that appeal was dismissed on August 1, 2017, pending the disposition of the Appellants' motion to reconsider. Appellant received written notice of entry of the October 5 order, denying their motion to reconsider, on October 5, 2017.

[The next page is the signature page.]

Respectfully submitted,

October 6, 2017

s/Nathan A. Earle  
Nathan A. Earle (S.C. Bar No. 73814)  
1541 Wade Hampton Blvd., Suite E  
Greenville, SC 29609  
(864) 915-5228  
nathanearle@upstatelegal.net  
Attorney for Appellant

Other Counsel of Record:

Danny C. Crowe (S.C. Bar No. 1480)  
Crowe LaFave, LLC  
Post Office Box 1149  
Columbia, South Carolina 29202  
Phone: (803) 724-5728  
danny@crowelafave.com  
Attorney for Respondent City of Woodruff

Terry F. Clark (S.C. Bar No. 1250)  
City of Woodruff  
Post Office Box 1389  
Woodruff, South Carolina 29388  
Phone: (864) 476-8154  
tclark@cityofwoodruff.com  
Attorney for Respondent City of Woodruff

Michael A. Graham (S.C. Bar No. 16863)  
THE LAW OFFICES OF MICHAEL A. GRAHAM, LLC  
Post Office Box 433  
Columbia, South Carolina 29202  
(803) 764-3920  
Michael.graham@mgrahamlaw.com  
Attorney for Defendant Terraces at Woodruff

## Certificate of Electronic Notification

### Recipients

**Michael Graham** - Notification transmitted on 10-17-2017 04:29:40 PM.

**Terry Clark** - Notification transmitted on 10-17-2017 04:29:40 PM.

**Danny Crowe** - Notification transmitted on 10-17-2017 04:29:40 PM.

**Nathan Earle** - Notification transmitted on 10-17-2017 04:29:40 PM.

**RECEIVED**  
OCT 20 2017  
SC Court of Appeals

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2016CP4203288

Official File Stamp: 10-17-2017 04:29:24 PM

Court: CIRCUIT COURT

Common Pleas

Spartanburg

Case Caption: Elizabeth Earley , plaintiff, et al VS The City Of Woodruff Sc , defendant, et al

Document(s) Submitted: Notice/Other

Filed by or on behalf of: Nathan A. Earle

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Michael Andrew Graham for Terraces At Woodruff LLC

Terry F. Clark for The City Of Woodruff Sc

Nathan A. Earle for Elizabeth Earley et al

Danny Calvert Crowe for The City Of Woodruff Sc

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

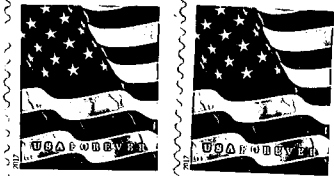
RECEIVED  
OCT 20 2017  
SC Court of Appeals



Nathan A. Earle

Attorney at Law | Certified Mediator

1541 Wade Hampton Blvd. Suite E  
Greenville, SC 29609



South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

OCT 20 2017

SC Court of Appeals

