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The State of South Carolina  
In The Court of Appeals

Appeal from Charleston County  
Hon. Deadre Jefferson, Circuit Court Judge

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NOV 15 2017

SC Court of Appeals

Case No. 2014-CP-10-4591

Jane Doe 202,

Appellant

v.

City of North Charleston,  
Leigh Anne McGowan, individually,  
Charles Francis Wholleb, individually,  
Anthony M. Doxey, individually

Respondents

Notice of Appeal

Plaintiff hereby appeals a ruling from the bench during trial October 2 – 13, 2017 which directed a verdict against the plaintiff on the state created danger cause of action; the court's decision not to charge the jury as requested by the plaintiff in response to a question from the jury; each of which contributed to the underlying the jury verdict for the defendants, filed October 16, 2017.

Each of the rulings is contained within the trial transcript rather than being embodied in a written order. The pertinent parts of the transcript have been requested.

Respectfully submitted,



Gregg Meyers, SC Bar No. 9908  
Of Counsel, Pierce Hems Sloan & Wilson LLC  
321 East Bay Street  
Charleston SC 29401  
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greggmeyers@phswlaw.com

Other counsel of Record:

Chris Dorsel  
Senn Legal, LLC  
3 Wesley Drive  
Charleston SC 29407

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Appellant NOV 15 2017  
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Respondents

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Proof of Service

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I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

Notice of Appeal, with attachments

Chris Dorsel  
Senn Legal, LLC  
3 Wesley Drive  
Charleston SC 29407

Done November 12, 2017:



Gregg Meyers  
Of Counsel  
Pierce Hems Sloan & Wilson LLC  
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‡ SPECIAL COUNSEL  
▲ OF COUNSEL  
● MEMBER SC & TN BAR

November 13, 2017

Hon. Jenny Abbott Kitchings  
Clerk of Court  
Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**  
NOV 15 2017  
SC Court of Appeals

Re: Doe 202 v North Charleston et al., 2014-CP-0-4591

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal and Amended Notice of Appeal in the case captioned above.

Also enclosed are the following:

1. Proof of service of the Notice of Appeal and Amended Notice of Appeal on counsel for the Respondents,
2. A copy of the jury verdict in the case, from which appeal is taken. The two other orders in the case are contained only in the transcript, which has been requested,
3. A filing fee of \$100,
4. A copy of the letter to the clerk of the lower court filing the notice of appeal. And
5. A copy of two letters to the court reporters who, combined, covered the trial ordering the transcript of the proceedings below.

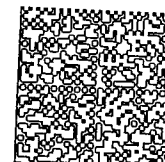
Please file this notice with the Court. Thank you very much.

Sincerely

A handwritten signature in black ink, appearing to read "Gregg Meyers". The signature is fluid and cursive, with the first name "Gregg" and last name "Meyers" clearly distinguishable.

Gregg Meyers

cc: Counsel for Respondents



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