

85329

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Thomas A. Russo, Circuit Court Judge

Case No. 2015-CP-36-00141

RECEIVED  
DEC 06 2017  
SC Court of Appeals

Desa Ballard..... Appellant/Respondent,

v.

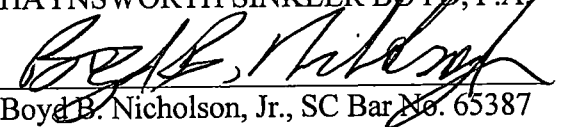
Newberry County..... Respondent/Appellant.

**NOTICE OF CROSS-APPEAL**

Respondent/Appellant Newberry County (the "County") appeals the Second Amended Order of the Honorable Thomas A. Russo dated November 17, 2017 (a copy of which is attached). The County received written notice of the entry of this Order on November 17, 2017, and the County received written notice of the Appellant/Respondent's Notice of Appeal on November 27, 2017.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.



Boyd B. Nicholson, Jr., SC Bar No. 65387

Sarah P. Spruill, SC Bar No. 68337

HAYNSWORTH SINKLER BOYD, P.A.

ONE North Main, 2nd Floor

Greenville, SC 29601-2772

Telephone: 864.240.3200

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December 4, 2017  
Greenville, South Carolina

Attorneys for Respondent/Appellant

Other counsel of record:

Joseph M. McCulloch, Jr., Esq.  
Kathy R. Schillaci, Esq.  
McCulloch & Schillaci, Attorneys at Law  
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Columbia, SC 29211  
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Attorneys for Appellant/Respondent

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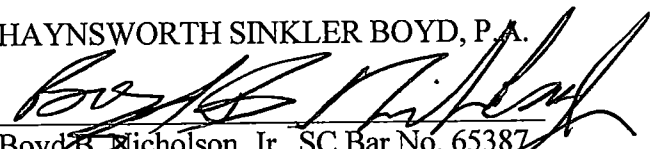
**PROOF OF SERVICE**

I certify that I have served the Notice of Cross-Appeal on Appellant/Respondent  
Desa Ballard via e-mail and by depositing a copy of it in the United States mail, postage  
prepaid, on December 4, 2017, addressed to her attorneys of record:

Joseph M. McCulloch, Jr., Esq.  
Kathy R. Schillaci, Esq.  
McCulloch & Schillaci, Attorneys at Law  
Post Office Box 11623  
Columbia, SC 29211  
E-Mail: [kathy@mccullochlaw.com](mailto:kathy@mccullochlaw.com) and [joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

  
Boyd B. Nicholson, Jr., SC Bar No. 65387

Sarah P. Spruill, SC Bar No. 68337

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December 4, 2017  
Greenville, South Carolina

Haynsworth  
Sinkler Boyd, P.A.

ATTORNEYS AND COUNSELORS AT LAW

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ATTORNEY  
DIRECT DIAL NUMBER 864.240.3247  
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December 4, 2017

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

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DEC 06 2017  
SC Court of Appeals

Re: Desa Ballard v. Newberry County  
Appellate Case No. 2017-002429

Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of a Notice of Cross-Appeal in the above-referenced matter, together with our Proof of Service of same, and filing fee check in the amount of \$100.00. After filing, please return the file-stamped copies to me in the self-addressed, postage paid envelope provided.

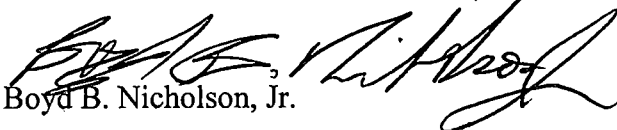
By copy of this letter, I am serving a copy of same via e-mail and U.S. mail upon counsel for the Appellant/Respondent, Joseph M. McCulloch, Jr., Esq. and Kathy R. Schillaci, Esq. I am also providing a copy to the Honorable Elizabeth P. Folk, Clerk of Court for Newberry County.

If you have any questions, please feel free to contact me at the above number.

With kind regards, I am

Sincerely yours,

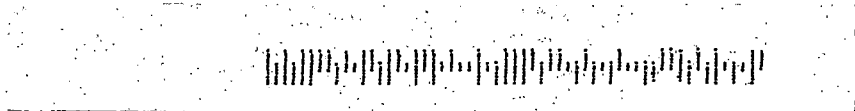
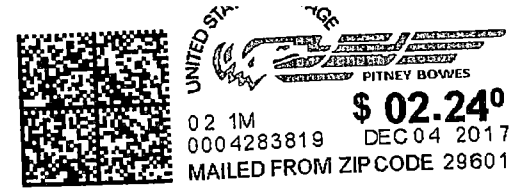
HAYNSWORTH SINKLER BOYD, P.A.

  
Boyd B. Nicholson, Jr.

BBNjr:dlh

Enclosure

cc: Joseph M. McCulloch, Jr., Esq. and Kathy R. Schillaci, Esq. (Via E-Mail and U.S. Mail)  
The Honorable Elizabeth P. Folk, Newberry County Clerk of Court (Via U.S. Mail)



Haynsworth  
Sinkler Boyd, P.A.

ATTORNEYS AND COUNSELORS AT LAW

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The Honorable Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
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