

85436

The State of South Carolina
In The Court of Appeals

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

Case No. 2014-CP-10-4591

RECEIVED

DEC 18 2017

SC Court of Appeals

Appellant

Jane Doe 202, by John Doe MM and John Doe HS,
Each of whom holds power of attorney for Jane Doe

v.

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

Respondents

MOTION TO REINSTATE APPEAL

The Court dismissed this appeal by Order of December 12, 2017 for failure to copy the Office of Court Administration with a copy of the transcript request, as required by Rule 207 of the South Carolina Appellate Court Rules. Counsel for Appellant moves the Court accept the letter which was mailed to the Office of Court Administration on November 28, 2017 (Exh. A). The failure to copy The South Carolina Court of Appeals on the attached letter was inadvertent and we ask that the Court reinstate the Appeal.

Respectfully submitted,

Gregg Meyers

Gregg Meyers, SC Bar No. 9908

Of Counsel, Pierce Hems Sloan & Wilson LLC

321 East Bay Street

Charleston SC 29401

843-722-7733, 843-722-7732 facsimile

greggmeyers@phswlaw.com

The State of South Carolina
In The Court of Appeals

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

Case No. 2014-CP-10-4591

Jane Doe 202, by John Doe MM and John Doe HS,
Each of whom holds power of attorney for Jane Doe

Appellant

v.

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

Respondents

Proof of Service

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

Amended Notice of Appeal, with attachments

By placing a copy of the documents in the United States mail, first-class postage pre-paid,
addressed to:

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

Done November 13, 2017.

Mary Stroudines
as Paralegal for

Gregg Meyers
Of Counsel
Pierce Hems Sloan & Wilson LLC
321 East Bay Street
Charleston SC 29401
843-722-7733, 843-722-7732 facsimile
greggmeyers@phswlaw.com

RECEIVED
DEC 18 2017
SC Court of Appeals

PIERCE, HERNS, SLOAN & WILSON, LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE HOUSE • 321 EAST BAY STREET
CHARLESTON, SOUTH CAROLINA 29401

POST OFFICE BOX 22437
CHARLESTON, SOUTH CAROLINA 29413

(843) 722-7733
(843) 722-7732 FAX
www.phswlaw.com

M. TODD RAINSFORD
CHRISTINA L. PERRIN
BENJAMIN C. SMOOT, II ✉
J. MORGAN FORRESTER
T.A.C. HARGROVE II

✉ MEMBER SC & VA BAR

CARL E. PIERCE, II
LOUIS P. HERNS
ALLAN P. SLOAN, III ✹
JOSEPH C. WILSON, IV †
JAMES G. KENNEDY
WILLIAM P. EARLY ●
SONALY K. HENDRICKS †
GREGG MEYERS ▲
* MEMBER SC & FL BAR
◆ CERTIFIED SC CIRCUIT
COURT MEDIATOR
† MEMBER SC, FL & GA BAR
+ SPECIAL COUNSEL
▲ OF COUNSEL
● MEMBER SC & TN BAR

Email: marygrondines@phswlaw.com
Direct Dial: (843) 725-7715

November 28, 2017

Via First Class Mail:

Office of Court Administration
1220 Senate Street
Suite 200
Columbia, SC 29201

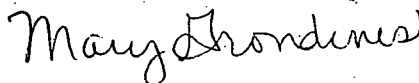
Re: Jane Doe 202 v. North Charleston
Appellate Case No. 2017-002392

Dear Sir/Madam:

Pursuant to the enclosed letter we received, I am writing to let your office know that we have ordered the trial transcript from the court reporters who attended the trial of Jane Doe 202 v. North Charleston.

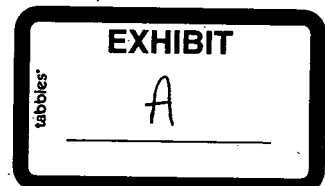
With kind regards, I am

Sincerely,



Mary K. Grondines
Paralegal to Gregg Meyers

MKG/
Enclosure as stated
cc: Christopher Dorsel, Esquire
Sandra J. Senn, Esquire
Robin Lilly Jackson, Esquire



PIERCE, HERNS, SLOAN & WILSON, LLC

ATTORNEYS AND COUNSELORS AT LAW

THE BLAKE HOUSE • 321 EAST BAY STREET
CHARLESTON, SOUTH CAROLINA 29401

POST OFFICE BOX 22437
CHARLESTON, SOUTH CAROLINA 29413

(843) 722-7733
(843) 722-7732 FAX
www.phswlaw.com

M. TODD RAINSFORD
CHRISTINA L. PERRIN
BENJAMIN C. SMOOT, II ☐
J. MORGAN FORRESTER
T.A.C. HARGROVE II

☐ MEMBER SC & VA BAR

CARL E. PIERCE, II
LOUIS P. HERNS
ALLAN P. SLOAN, III *◆
JOSEPH C. WILSON, IV †
JAMES G. KENNEDY
WILLIAM P. EARLY ●
SONALY K. HENDRICKS †
GREGG MEYERS ▲
* MEMBER SC & FL BAR
◆ CERTIFIED SC CIRCUIT
COURT MEDIATOR
† MEMBER SC, FL & GA BAR
‡ SPECIAL COUNSEL
▲ OF COUNSEL
● MEMBER SC & TN BAR

Email: greggmeyers@phswlaw.com
Phone: (843)725-7750

December 15, 2017

RECEIVED

DEC 18 2017

SC Court of Appeals

Honorable Jenny Abbott Kitchings,
Clerk of Court
PO Box 11629
Columbia, SC 29211

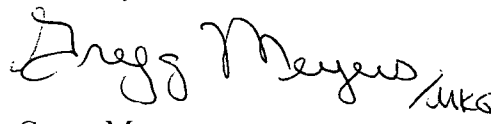
Re: Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe, Appellant v. City of North Charleston; Leigh Anne McGowan, individually, Charles Francis Wholleb, individually, and Anthony M. Doxey, individually, Respondents.
Appellate Case No. 2017-002392

Dear Ms. Kitchings:

Enclosed please find an original and 6 copies of Plaintiff's Motion to Reinstate Appeal with Certificate of Service in regard to the above-referenced matter.

With kind regards,

Sincerely,



Gregg Meyers

GM/mkg

Enclosures as stated

cc: Christopher Thomas Dorsel, Esquire (w/ encl.)
Sandra Senn, Esquire (w/ encl.)
Robin Lilley Jackson, Esquire (w/ encl.)