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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
In the Court of Common Pleas for the Ninth Circuit

Jean H. Toal, Circuit Court Judge

Case No. 2015-CP-08-02380

**RECEIVED**  
MAR 15 2018  
SC Court of Appeals

Amy Kovach .....Appellant

v.

Joshua S. Whitley and Karen Whitley ..... Respondents

NOTICE OF APPEAL

Plaintiff/Appellant Amy Kovach appeals the following orders:

- (a) ORDER GRANTING DEFENDANTS JOSHUA S. WHITLEY'S AND KAREN WHITLEY'S MOTIONS FOR SANCTIONS entered on OCTOBER 24, 2016 (attached hereto as Exhibit A).
- (b) ORDER DENYING MOTIONS FOR RECONSIDERATION AND AWARDING SANCTIONS entered on February 19, 2018 (attached hereto as Exhibit B).

Plaintiff/Appellant received written notice of entry of the most recent order appealed from on February 19, 2018.

March 13, 2018

BARNWELL WHALEY  
PATTERSON & HELMS, LLC

By: M. Dawes Cooke, Jr.

M. Dawes Cooke, Jr., Esq.  
288 Meeting Street, Ste 200  
Charleston, SC 29401  
(843) 577-7700

Attorney for Plaintiff/Appellant, Amy Kovach

Other Counsel of Record:

Jeffrey A. Breit, Esquire  
Breit Drescher Imprevento, P.C.  
Town Pavilion Center II  
600 22<sup>nd</sup> Street, Suite 402  
Virginia Beach, VA 23451  
Attorney for Respondent Joshua Whitley

Nancy Bloodgood, Esquire  
Bloodgood & Sanders, LLC  
242 Mathis Ferry Road, Suite 201  
Mt. Pleasant, SC 29464  
Former Attorney for Plaintiff/Appellant  
Amy Kovach

Wm. Howell Morrison, Esquire  
Haynsworth Sinkler Boyd, P.A.  
134 Meeting Street, 3<sup>rd</sup> Floor  
Charleston, SC 29401  
Attorney for Respondent Karen Whitley

Katie Fowler Monoc, Esquire  
Monoc Roberts  
P.O. Box 21057  
Charleston, SC 29413  
Attorney for Nancy Bloodgood, Esquire

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
In the Court of Common Pleas for the Ninth Circuit

Jean H. Toal, Circuit Court Judge

Case No. 2015-CP-08-2380

**RECEIVED**  
MAR 15 2018  
SC Court of Appeals

Amy Kovach .....Appellant

v.

Joshua S. Whitley and Karen Whitley ..... Respondents

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the above-referenced Respondents by depositing a copy of it in the United States Mail, postage prepaid, on March 13, 2018, addressed to the following parties and their attorneys of record:

Jeffrey A. Breit, Esquire  
Breit Drescher Imprevento, P.C.  
Town Pavilion Center II  
600 22<sup>nd</sup> Street, Suite 402  
Virginia Beach, VA 23451  
Attorney for Respondent Joshua Whitley

Wm. Howell Morrison, Esquire  
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134 Meeting Street, 3<sup>rd</sup> Floor  
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Mt. Pleasant, SC 29464  
Former Attorney for Plaintiff/Appellant  
Amy Kovach

Katie Fowler Monoc, Esquire  
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P.O. Box 21057  
Charleston, SC 29413  
Attorney for Nancy Bloodgood, Esquire

BARNWELL WHALEY  
PATTERSON & HELMS, LLC

By: M. Dawes Cooke, Jr.

M. Dawes Cooke, Jr., Esq.  
288 Meeting Street, Ste 200  
Charleston, SC 29401  
(843) 577-7700  
Attorney for Plaintiff/Appellant, Amy Kovach



**REPLY TO SOUTH CAROLINA OFFICE**

**M. Dawes Cooke, Jr.**  
**mdc@Barnwell-Whaley.com**

March 13, 2018

Honorable Jenny Kitchings  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
**MAR 15 2018**  
**SC Court of Appeals**

RE: Amy Kovach v. Joshua S. Whitley and Karen Whitley  
Berkeley County Case No.: 2015-CP-08-02380

Dear Ms. Kitchings:

Enclosed for filing are the original and one copy of a Notice of Appeal on behalf of Amy Kovach in the above-referenced matter. Also enclosed are the following:

- (1) Proof of Service of the Notice of Appeal on the Respondents;
- (2) Copy of the Order Granting Defendants Joshua S. Whitley and Karen Whitley's Motions for Sanctions;
- (3) Copy of the Order Denying Motions for Reconsideration and Awarding Sanctions; and
- (4) A filing fee of \$100.00.

Please return the clocked copy of the Notice and Proof of Service in the enclosed envelope.

By copy of this letter, I am serving a copy on the Berkeley County Clerk of Court and counsel of record in this matter.

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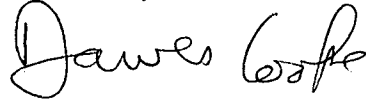
[www.barnwell-whaley.com](http://www.barnwell-whaley.com)

**SOUTH CAROLINA OFFICE:**  
288 Meeting Street, Suite 200, Charleston, SC 29401  
P. 843.577.7700 F. 843.577.7708

**NORTH CAROLINA OFFICE:**  
1427 Military Cutoff Road, Suite 202, Wilmington, NC 28403  
P. 910.679.1388 F. 910.679.4663

REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE.

Sincerely,

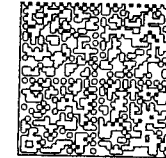
A handwritten signature in cursive script that reads "Dawes Cooke". The signature is written in black ink and is positioned above the printed name.


M. Dawes Cooke, Jr.

MDCjr/klj

Enclosures

c: Honorable Mary P. Brown, Berkeley County Clerk of Court  
Jeffrey A. Breit, Esquire  
Wm. Howell Morrison, Esquire  
Nancy Bloodgood, Esquire  
Katie Fowler Monoc, Esquire



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**BARNWELL  
 WHALEY**  
 PATTERSON & HELMS LLC

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P.O. Drawer H, Charleston, SC 29402-0197

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Honorable Jenny Kitchings  
 S.C. Court of Appeals  
 P.O. Box 11629  
 Columbia, SC 29211

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