

86265

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

Appeal from the Court of Common Pleas
For Charleston County
Honorable Kristi L. Harrington, Circuit Court Judge
Civil Action No.: 2016-CP-10-5578

MICHAEL MURRAY,

Appellant,

v.

TOWN OF SULLIVAN'S ISLAND,

RECEIVED
MAR 23 2018
SC Court of Appeals

Respondent.

NOTICE OF APPEAL

Stephen P. Groves, Sr., Esquire
S.C. Bar No.: 007854
Mary D. Shahid, Esquire
S.C. Bar No.: 001794
NEXSEN PRUET, LLC
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.720.1725/843.720.1788
Telecopier: 843.414.8206/843.414.8242
E-Mail: SGroves@nexsenpruet.com
MShahid@nexsenpruet.com

Attorneys for the Appellant

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Appellant, Michael Murray ("Mr. Murray"), pursuant to Rule 203 of the South Carolina Appellate Court Rules, and respectfully serves notice that he is appealing the following orders and judgments:

- a. Order In Response to Defendant/Appellant's Motion to Alter and Amend In Accordance With Rule 59 issued by the Honorable Kristi L. Harrington, Circuit Court Judge, dated 22 February 2018, and filed 23 February 2018;¹
- b. SCRCP Form 4C Order issued by the Honorable Kristi L. Harrington, Circuit Court Judge, dated 6 January 2018, and filed 11 January 2018.

Copies of the two referenced Circuit Court orders are collectively attached hereto as **Exhibit "A"** and incorporated herein by reference.

Respectfully submitted:

NEXSEN PRUET, LLC

By:

Stephen P. Groves, Sr., Esquire
S.C. Bar No.: 007854
Mary D. Shahid, Esquire
S.C. Bar No.: 001794
NEXSEN PRUET, LLC
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.720.1725/843.720.1788
Telecopier: 843.414.8206/843.414.8242
E-Mail: SGroves@nexsenpruet.com
MShahid@nexsenpruet.com

Attorneys for the Appellant, Michael Murray

Charleston, South Carolina

21 March 2018

¹ Counsel for Mr. Murray first received notice of and a copy of Judge Harrington's order on 1 March 2018.

OTHER COUNSEL OF RECORD

John J. Dodds, III, Esquire
CISA & DODDS, LLP
858 W Lowcountry Boulevard
Unit No. 101
Mt. Pleasant, South Carolina 29464
Telephone: 843.881.6530
E-Mail: jdodds@cisadodds.com

Attorneys for the Respondent

NPCHAR1:2394335.1-NC-(SPG) 059803-00001

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

Appeal from the Court of Common Pleas
For Charleston County
Honorable Kristi L. Harrington, Circuit Court Judge
Civil Action No.: 2016-CP-10-5578

MICHAEL MURRAY,

Appellant,

v.

TOWN OF SULLIVAN'S ISLAND,

Respondent.

**PROOF OF SERVICE
FOR THE NOTICE OF APPEAL**

Stephen P. Groves, Sr., Esquire
S.C. Bar. No.: 007854
Mary D. Shahid, Esquire
S.C. Bar No.: 001794
NEXSEN PRUET, LLC
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.720.1725/843.720.1788
Telecopier: 843.414.8206/843.414.8242
E-Mail: SGroves@nexsenpruet.com
MShahid@nexsenpruet.com

Attorneys for the Appellant

RECEIVED
MAR 23 2018
SC Court of Appeals

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 21 March 2018, I served a copy of the **Notice of Appeal** submitted by the Appellant, Michael Murray, on counsel for the Respondent via the United States Mail, postage pre-paid, and addressed as follows:

John J. Dodds, III, Esquire
CISA & DODDS, LLP
858 W Lowcountry Boulevard
Unit No. 101
Mt. Pleasant, South Carolina 29464
Telephone: 843.881.6530
E-Mail: jdodds@cisadodds.com

Attorneys for the Respondent

Signed: _____

Stephen P. Groves, Sr.

Charleston, South Carolina

21 March 2018

NPCHAR1:2394335.1-NC-(SPG) 059803-00001

Stephen P. Groves, Sr.
Member
Admitted in SC

21 March 2018

The Honorable Julie Armstrong
Clerk of Court, Charleston County
100 Broad Street
Charleston, South Carolina 29401

RECEIVED
MAR 23 2018
SC Court of Appeals

Re: Michael Murray v. Town of Sullivan's Island
Appeal from the Charleston County Court of Common Pleas
Case Action No.: 2016-CP-10-5578
Appellate Case Tracking No.: 2018-
NP File No.: 059803-00001

Dear Julie:

Enclosed please find two copies of a Notice of Appeal in the above-referenced appellate matter submitted on behalf of the Appellant, Michael Murray. I also enclose two copies of a Proof of Service indicating service of a copy of the Notice of Appeal upon the legal counsel for the Respondent, Town of Sullivan's Island. This Notice of Appeal is contemporaneously being sent to the South Carolina Court of Appeals.

I would appreciate your filing one copy of the Notice of Appeal, as well as one copy of the Proof of Service, with the Charleston County Court of Common Pleas and returning one stamped copy of each to my attention in the enclosed self-addressed envelope.

If you need anything else or I otherwise may be of any assistance to you regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is sgroves@nexsenpruet.com.

Charleston

Charlotte

Columbia

Greensboro

Greenville

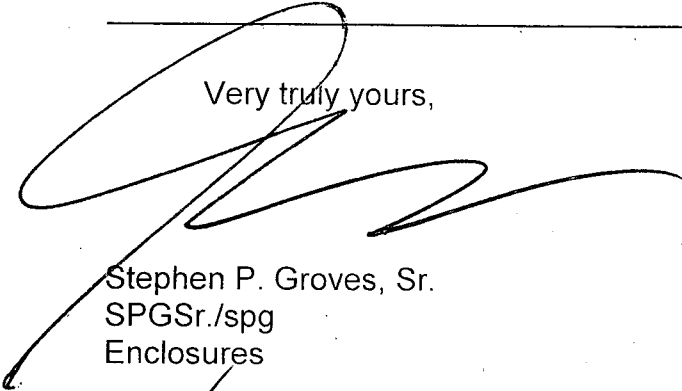
Hilton Head

Myrtle Beach

Raleigh

Honorable Julie Armstrong
Clerk of Court
21 March 2018
Page 2 of 2

Very truly yours,



Stephen P. Groves, Sr.
SPGSr./spg
Enclosures

cc: ✓ Hon. Jenney Abbot Kitchings – Clerk of Court SCCOA
John J. Dodds, III, Esquire

NPCHAR1:2316645.1-LT-(SPG) 059803-00001

Stephen P. Groves, Sr.
Member
Admitted in SC

21 March 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
SOUTH CAROLINA COURT OF APPEALS
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
MAR 23 2018
SC Court of Appeals

Re: Michael Murray v. Town of Sullivan's Island

Appeal from the Charleston County Court of Common Pleas
Case Action No.: 2016-CP-10-5578
Appellate Case Tracking No.: 2018-
NP File No.: 059803-00001

Dear Ms. Kitchings:

Pursuant to Rules 203(a), (b), (d), SCACR, enclosed please find the original and two copies of a Notice of Appeal in the above-referenced appellate matter submitted on behalf of the Appellant, Michael Murray. I also enclose two copies of a Proof of Service indicating service of a copy of the Notice of Appeal upon the legal counsel for the Respondent, Town of Sullivan's Island. This Notice of Appeal is contemporaneously being sent to the Clerk of Court for the Charleston County Court of Common Pleas.

- Charleston
- Charlotte
- Columbia
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh

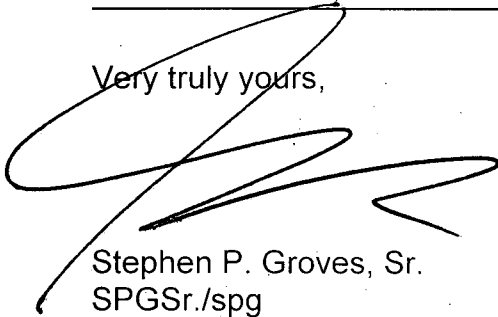
Please note that copies of the two appealed orders are collectively attached to the Notice of Appeal as Exhibit "A" and incorporated therein by reference. I also enclose our firm check in the amount of \$100.00 as payment for the applicable filing fee set forth in Rule 203(d)(1)(B)(iii), SCACR.

I would appreciate your filing the Notice of Appeal, as well as the Proof of Service, with the Court of Appeals and returning one stamped copy of each to my attention in the enclosed self-addressed stamped envelope.

If you need anything else or I otherwise may be of any assistance to you or to the Court of Appeals regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is sgroves@nexsenpruet.com.

Honorable Jenny Abbott Kitchings
Clerk of Court
21 March 2018
Page 2 of 2

Very truly yours,



Stephen P. Groves, Sr.
SPGSr./spg
Enclosures

cc: Hon. Julie Armstrong (Chas. Co. Court of Common Pleas)
John J. Dodds, III, Esquire

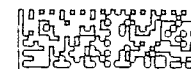
NPCHAR1:2316642.1-LT-(SPG) 059803-00001

Hasler

FIRST-CLASS MAIL

03/21/2018

US POSTAGE \$002.26⁰



ZIP 29401
011E11677183

NEXSEN | PRUET

P. O. Box 486
Charleston SC 29402

RECEIVED
MAR 23 2018
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
SOUTH CAROLINA COURT OF APPEALS
1220 Senate Street
Columbia, South Carolina 29201

(SPG) 059803-00001

