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MAR 21 2018

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Case Tracking No. _____

APPEAL FROM CHARLESTON COUNTY COURT OF COMMON PLEAS
Civil Action No. 2017-CP-10-02148
J. C. Nicholson, Jr., Circuit Court Judge

Cleo Sanders Plaintiff

vs.

Savannah Highway Automotive Company,
a General Partnership d/b/a Rick Hendrick
Dodge Chrysler Jeep Ram, Isiah S. White,
Danny Anderson and Patrick Bachrodt, Jr..... Defendants

Of whom, Savannah Automotive Company,
a General Partnership d/b/a Rick Hendrick
Dodge Chrysler Jeep Ram and Isiah S. White are Appellants

and

Of whom, Cleo Sanders is. Respondent

NOTICE OF APPEAL

John T. Lay, Jr.
Jessica A. Waller
Alice P. Adams
GALLIVAN, WHITE & BOYD, P.A.
Post Office Box 7368
Columbia, SC 29202
(803) 779-1833

*Attorneys for Appellants Savannah Highway
Automotive Company, a General
Partnership d/b/a Rick Hendrick Dodge
Chrysler Jeep Ram and Isiah S. White*

Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White appeal the Order of the Honorable J. C. Nicholson, Jr. granting Plaintiff Cleo Sanders' Motion to Compel signed February 16, 2018, filed February 20, 2018 and received by Appellants on February 27, 2018.

GALLIVAN, WHITE & BOYD, P.A.

By: 

John J. Lay, Jr., SC Bar # 64526

Jessica A. Waller, SC Bar # 100256

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*Attorneys for Appellants Savannah Highway
Automotive Company, a General Partnership
d/b/a Rick Hendrick Dodge Chrysler Jeep Ram
and Isiah S. White*

March 21, 2018

Other Counsel of Record:

C. Steven Moskos
4000 Faber Place Drive, Suite 300
North Charleston, SC 29405
(843) 763-5297

Attorney for Respondent

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PROOF OF SERVICE

I, the undersigned employee of Gallivan, White & Boyd, P.A., do hereby certify that I have caused the below referenced to be served via U.S. mail, postage prepaid, *or by other delivery as indicated*, to all parties of record at the address(es) shown below.

1. Notice of Appeal;
2. Proof of Service of the Notice of Appeal served on Respondent, Charleston County Clerk of Court, and The Honorable J. C. Nicholson, Jr.;
3. Copy of the Order to be challenged on appeal, which was signed by The Honorable J. C. Nicholson, Jr., dated February 16, 2018, filed on February 20, 2018 with the Charleston County Clerk of Court's Office, and received in our office on February 27, 2018;
4. Letter regarding request for transcript; and
5. Filing fee check in the amount of \$100.00.

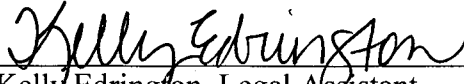
Parties of Record

The Honorable J. C. Nicholson, Jr.
Circuit Court Judge
100 Broad Street, Suite 106
Charleston, SC 29401

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad Street, Suite 106
Charleston, SC 29401-2258

C. Steven Moskos, Esquire
C. Steven Moskos, P.A.
4000 Faber Place Drive, Suite 300
North Charleston, SC 29405

The Honorable Jenny Abbott Kitchings
SC Court of Appeals
1015 Sumter Street
Columbia, SC 29211
(via hand delivery)



Kelly Edrington, Legal Assistant

Date: March 21, 2018

March 21, 2018

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
SC Court of Appeals
1015 Sumter Street
Columbia, SC 29211

Re: *Cleo Sanders v. Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Chrysler Jeep Dodge Ram, Isiah S. White, Danny Anderson and Patrick Bachrodt, Jr.*
Charleston County Case No. 2017-CP-10-02148
GWB File No. 8493-6

Dear Ms. Kitchings:

Enclosed for filing are the following:

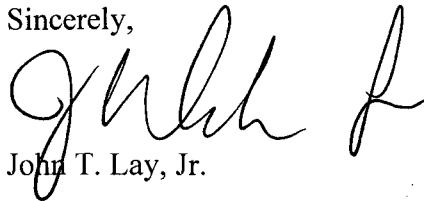
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4. Letter regarding request for transcript; and
5. Filing fee check in the amount of \$100.00.

Appellants appeal all rulings related to granting Plaintiff's Motion to Compel.

By copy of this letter, I am providing a copy of the Notice of Appeal to The Honorable J. C. Nicholson, Jr. and Counsel for the Respondent, and am filing the Notice of Appeal with the Charleston County Clerk of Court's Office.

I would appreciate you returning clocked copies to me via our courier. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Lay, Jr.", written in a cursive style.

John T. Lay, Jr.

JTL/kae

Enclosures

cc: The Honorable J. C. Nicholson, Jr.
Charleston County Clerk of Court's Office
C. Steven Moskos, Esquire