

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Grace Gilchrist Knie, Circuit Court Judge

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Case No. 2016-CP-42-2478

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**RECEIVED**  
SEP 10 2018  
SC Court of Appeals

Betty Jean Perkins, ..... Respondent,

v.

South Carolina Department of Transportation, ..... Appellant.

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**NOTICE OF APPEAL**

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The Appellant South Carolina Department of Transportation appeals the Order issued by the Honorable Grace Gilchrist Knie, filed April 19, 2018, including the “Verdict Form” filed February 15, 2018 and the judgment entered in this action on April 19, 2018. The Appellant also appeals from all pre-trial rulings, trial rulings and post-trial rulings issued by the Honorable Grace Gilchrist Knie, including the Order Denying Defendant’s Post-Trial Motions filed August 10, 2018.

The Appellant's counsel received written notice of entry of the Order filed August 10, 2018, on that same date.

LINDEMANN, DAVIS & HUGHES, P.A.



BY: s/ Andrew F. Lindemann

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Department of Transportation*

September 10, 2018

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*Counsel for Respondent  
Betty Jean Perkins*

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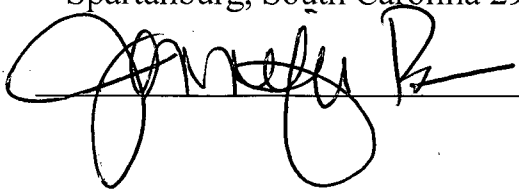
**CERTIFICATE OF SERVICE**

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The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Appellant South Carolina Department of Transportation, does hereby certify that service of the **Notice of Appeal** was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 10th day of September 2018:

John E. Parker, Esquire  
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# LINDEMANN, DAVIS & HUGHES, P.A.

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September 10, 2018

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Betty Jean Perkins v. South Carolina Department of Transportation  
Civil Action Number: 2016-CP-42-2478  
Claim Number: 01391  
File Number: 104.20000

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SEP 10 2018  
SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the **Notice of Appeal** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my paralegal. I have also enclosed my firm's \$100.00 check for the filing fee.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
September 10, 2018  
Page Two

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cc: (w/ Enclosure)

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