

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTERFIELD COUNTY
In the Court of Common Pleas

Paul M. Burch, Circuit Court Judge
William O. Spencer, Special Referee

Case No. 2017-CP-13-804

RECEIVED
OCT 09 2018
SC Court of Appeals

First Citizens Bank & Trust Company and Sadie M. Murvin, Respondents,

v.

Miranda Libby Murvin, a/k/a Miranda Libby Murvin Zimmerman
and Great American Life Insurance Company, Defendants.

Of whom Great American Life Insurance Company is Appellant.

NOTICE OF APPEAL

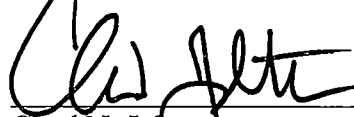
Pursuant to Rule 203 of the South Carolina Appellate Court Rules, Appellant Great American Life Insurance Company appeals from the following orders in the above-referenced case:

1. March 5, 2018 Entry of Default (Attached as Exhibit A)
2. March 22, 2018 Form-4 Entry of Judgment (Attached as Exhibit B)
3. March 22, 2018 Order Entering Default for Plaintiffs (Attached as Exhibit C)
4. September 13, 2018 Form-4 Order Denying Motion to Vacate (Attached as Exhibit D)

5. September 13, 2018 Order Denying Motion to Vacate (Attached as Exhibit E)

Appellant received notice of the September 13, 2018 Order Denying its Motion to Vacate Default Judgment on September 18, 2018.

Respectfully submitted,



Chad N. Johnston
R. Walker Humphrey, II
WILLOUGHBY & HOEFER, P.A.
930 Richland Street
Post Office Box 8416
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(803) 252-3300

Attorneys for Appellant
Great American Life Insurance Company

October 9, 2018
Columbia, South Carolina

Other Counsel of Record:

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Attorney for Respondents

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and Great American Life Insurance Company, Defendants.

Of whom Great American Life Insurance Company is Appellant.

PROOF OF SERVICE

This is to certify that I, a paralegal with the law firm Willoughby & Hoefler, P.A., have caused to be served this day one (1) copy of the **Notice of Appeal** by depositing the same in the U.S. Mail to the following:

The Honorable Wanda C. Miles
Chesterfield County Clerk of Court
PO Box 529
Chesterfield, South Carolina 29709-0529

RECEIVED
OCT 09 2018
SC Court of Appeals

Kevin M. Barth
Barth, Ballenger & Lewis, LLP
PO Box 107
Florence, South Carolina 29503


Laura Lee Andrews

Columbia, South Carolina
This 9th day of October 2018

WILLOUGHBY & HOEFER, P.A.
ATTORNEYS & COUNSELORS AT LAW

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TRACEY C. GREEN
BENJAMIN P. MUSTIAN**
CHAD N. JOHNSTON
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ELIZABETHANN LOADHOLT CARROLL
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**ALSO ADMITTED IN WASHINGTON, D.C.

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October 9, 2018

VIA HAND DELIVERY

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
OCT 09 2018
SC Court of Appeals

RE: *First-Citizens Bank & Trust Company et al. v. Miranda Libby Murvin et al.*,
C/A No. 17-CP-13-804

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the Notice of Appeal in the above-referenced matter on behalf of the Appellant, Great American Life Insurance Company. I would appreciate your acknowledging receipt of this Notice of Appeal by file stamping the extra copy of the Notice and returning it to me via our courier.

By copy of this letter to counsel, I am serving Respondents First-Citizens Bank & Trust Company and Sadie M. Murvin with a copy of this Notice and enclose a proof of service to that effect. By separate letter, I have also filed this Notice of Appeal with the Clerk of Court for Chesterfield County and enclose a copy of same for your records. Also enclosed, please find a check in the amount of \$100 for the filing fee.

If you have any questions, or require additional information, please do not hesitate to contract me. With best regards, I am,

Respectfully,

WILLOUGHBY & HOEFER, P.A.


Chad Johnston

Enclosures.

cc: The Honorable Wanda C. Miles (via U.S. Mail w/o enclosures)
Kevin M. Barth, Esquire (via U.S. Mail w/ enclosures)

WILLOUGHBY & HOEFER, P.A.
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PO Box 529
Chesterfield, SC 29709-0529

RE: *First-Citizens Bank & Trust Company et al. v. Miranda Libby Murvin et al.*,
C/A No. 17-CP-13-804


Dear Ms. Miles:

Enclosed, please find two (2) copies of the Notice of Appeal in the above-referenced matter on behalf of the Appellant Great American Life Insurance Company. I would appreciate your acknowledging receipt of this Notice of Appeal by file stamping the extra copy of the Notice and returning it to me via the enclosed envelope.

If you have any questions, or require additional information, please do not hesitate to contract me. With best regards, I am,

Respectfully,

WILLOUGHBY & HOEFER, P.A.


Chad Johnston

Enclosures.

The Honorable Wanda C. Miles

October 9, 2018

Page 2 of 2

cc: The Honorable Jenny Abbott Kitchings (via Hand Delivery w/o enclosures)
Kevin M. Barth, Esquire (via U.S. Mail w/o enclosures)