

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough
Master in Equity

CASE NO. 2016-CP-10-4565

RECEIVED
NOV 13 2018
SC Court of Appeals

MARY BETH SULLIVANAppellant

WAA

v.

PELICAN BAY PROPERTY OWNERS
ASSOCIATION, INC. Respondent.

NOTICE OF APPEAL

COMES NOW THE Appellant Mary Beth Sullivan, by and through her undersigned lawyers, who would respectfully appeal: (I) the *Order Granting Summary Judgment for Defendant Pelican Bay Property Owners Association, Inc.* (dated June 22, 2018, filed June 25, 2018, and received by the undersigned July 2, 2018), attached herewith as Exhibit "A"; and (II) the *Form 4 Order denying the Plaintiff's Motion to Reconsider, Alter or Amend* (dated October 10, 2019, filed October 12, 2018 and received by the undersigned on October 14, 2018) attached herewith as Exhibit "B".

Respectfully submitted,



Robert B. Varnado (SC Bar # 0007085)
BROWN & VARNADO LLC
P.O. Box 1127
Mount Pleasant, South Carolina 29465
(843) 737-7300
Attorney for Appellant

November 7, 2018
Mt. Pleasant, South Carolina

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Appellant's *Notice of Appeal* in the above referenced case has been served upon counsel of record by mailing a copy in an envelope properly addressed with postage prepaid on this date to the following:

Dawes M. Cooke, Esquire
Barbara J. Wagner, Esquire
Barnwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401



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ATTORNEYS AT LAW

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November 7, 2018

VIA U.S. MAIL

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

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Re: Mary Beth Sullivan v. Pelican Bay Property Owners Association, Inc.
Appeal to the South Carolina Court of Appeals
Case No.: 2016-CP-10-4565
Our File No.: 6283-1

Dear Ms. Kitchings:

Enclosed for filing please find the original of the Notice of Appeal in the above-referenced matter. Also enclosed are the following:

1. Proof of Service of the Notice of Appeal to the Respondent.
2. A copy of the orders which are to be challenged on Appeal.
3. A filing fee of \$300.00.
4. Letter to the Court reporter ordering the transcript, with cc to the Office of Ct. Admin.

I am causing a copy of all the foregoing to be served on opposing counsel and transmitting a copy to the Charleston County Clerk of Court for filing under separate cover. If you have any questions or directions, please do not hesitate to call.

With best regards, I remain

Very truly yours,

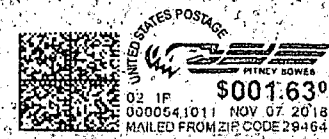
BROWN AND VARNADO LLC



Robert B. Varnado

RBV

cc: Dawes M. Cooke, Esquire
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