

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Mark Hayes, Circuit Court Judge

Case No. 20008-CP-42-3397

RECEIVED
DEC 18 2018
SC Court of Appeals

H. Hughes Andrews.....Respondent,

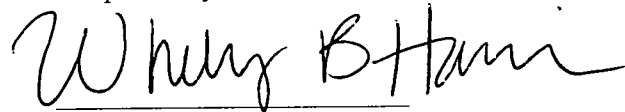
v.

Quentin Broom, Jr.....Appellant,

NOTICE OF APPEAL

Appellant Quentin Broom appeals from a bench trial held before the Honorable Mark Hayes in which the order was entered on November 8, 2017 and the order denying the motion for reconsideration was entered on November 20, 2018.

Respectfully submitted,



Matthew T. Richardson
Wyche
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December 18, 2018
Columbia, SC

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
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wharrison@mcgowanhood.com

ATTORNEYS FOR APPELLANT

Other Counsel of Record:

Rodney Pillsbury
25 Mills Avenue
Greenville, SC 29605

Blake A. Hewitt
Post Office Box 7965
Columbia, SC 29202

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Mark Hayes, Circuit Court Judge

Case No. 2008-CP-42-3397

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H. Hughes Andrews.....Respondent,

v.

Quentin Broom, Jr.....Appellant,

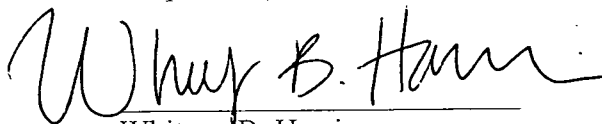
PROOF OF SERVICE

The undersigned hereby certifies that on December 18, 2018, she served counsel for Respondent with the *Notice of Appeal* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Rodney Pillsbury
25 Mills Avenue
Greenville, SC 29605

Blake A. Hewitt
Post Office Box 7965
Columbia, SC 29202

Respectfully submitted,



Whitney B. Harrison
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McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
S. Randall Hood
John G. Felder, Jr.
W. Jones Andrews, Jr.
Russell T. Burke
Jordan C. Calloway
Susan F. Campbell
Deborah Casey (NC)*
Ashley White Creech
Shawn B. Deery
Chance M. Farr (SC,NC)
Eve S. Goodstein



Whitney B. Harrison
Richard A. "Trey" Jones III
Patrick M. Killen
Anna S. Magann
Robert V. Phillips
Ranee Saunders
James L. Ward, Jr. (SC,NC)
James Stephen Welch (SC,OK)*
Jay F. Wright
Joseph G. Wright, III*
*Of Counsel

December 18, 2018

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
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SC Court of Appeals

RE: *Andrews v. Brom*
Appellate Case No. 2008-CP-42-3397

Dear Ms. Kitchings:

Enclosed please find for filing Appellant's Petition for Writ of Supersedeas and a filing fee for \$50 for the above referenced matter. By copy of this letter, I am serving this filing upon counsel of record for Respondent. Please clock in and return to me the enclosed copy in the envelope provided.

With kind regards,

Sincerely,

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive, flowing style.

Whitney B. Harrison

cc:
Blake A. Hewitt, Esquire
Rodney Pillsbury, Esquire
Matthew T. Richardson, Esquire

Enclosures

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
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*Of Counsel

December 18, 2018

RECEIVED
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SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Andrewes v. Broom*
Court of Common Pleas, Spartanburg County Case No. 2008-CP-42-3397

Dear Ms. Kitchings:

Enclosed please find for filing the Notice of Appeal and a filing fee of \$250 in the above referenced matter. By copy of this letter, I am filing this Notice in the lower court and serving it upon counsel of record for Respondent. Please clock in and return to me the enclosed copy in the envelope provided.

Additionally, Counsel is in possession of the trial transcript, and thus pursuant to Rule 208, SCACR, the due date for the initial brief is January 17, 2018, thirty days from the filing of the notice of appeal.

With kind regards,

Sincerely,

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive, flowing style.

Whitney B. Harrison

cc:

Blake A. Hewitt, Esquire
Rodney Pillsbury, Esquire
Matthew T. Richardson, Esquire
The Honorable Hope Blackely

Enclosures