

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

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Case No. 2017-CP-40-07131

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Shriners Hospitals for Children; Dorraine Lester;  
Fred Townsend; and Howard Townsend

Respondents,

v.

Wells Fargo Clearing Services, LLC d/b/a Wells Fargo Advisors, LLC;  
Wells Fargo Advisors, LLC; and Jessie Rowe Faircloth

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DEC 28 2018

Appellants.

**SC Court of Appeals**

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NOTICE OF APPEAL

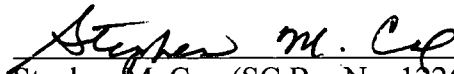
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Wells Fargo Advisors, LLC<sup>1</sup> and Jessie Rowe Faircloth (collectively, the “Appellants”) appeal: (i) the Form 4 Order of the Honorable Jocelyn Newman entered and received by Appellants on August 2, 2018 (the “Form 4 Order,” a copy of which is attached to this Notice as Exhibit A), which Form 4 Order entered a default as to the Appellants, denied Appellants’ Motion To Strike Respondents’ Amended Complaint, and denied Appellants’ Motion to Compel Arbitration and To Stay or Dismiss Action; (ii) the “formal written order” of the Honorable Jocelyn Newman referred to in the Form 4 Order (a copy of which is attached to this Notice as Exhibit B), entered and received by the Appellants on October 24, 2018, which provided explanation for the Court’s ruling in the Form 4 Order; and (iii) the Order of the Honorable Jocelyn Newman entered and received by Appellants on November 30, 2018 (a copy of which is attached to this Notice as Exhibit C), which Order denied Appellants’ Motion and Amended Motion to Reconsider the Court’s October 24, 2018 Order.

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<sup>1</sup> Wells Fargo Advisors, LLC is a d/b/a of Wells Fargo Clearing Services, LLC. Wells Fargo Clearing Services, LLC was made a party to this action following the filing of the initial complaint and was not a party to the subject orders cited here. Wells Fargo Clearing Services, LLC does not concede that Wells Fargo Advisors, LLC is a properly-named party to this lawsuit or to the orders cited herein.

This 28<sup>th</sup> day of December, 2018.

  
\_\_\_\_\_  
Stephen M. Cox (SC Bar No. 12263)  
Brian L. Church (SC Bar No. 80359)

**ROBINSON, BRADSHAW & HINSON, P.A.**  
202 East Main Street, Suite 201  
Post Office Drawer 12070  
Rock Hill, South Carolina 29731  
(803) 325-2900

**ATTORNEYS FOR APPELLANTS**

**Other Counsel of Record:**

Robert G. Rikard (SC Bar No. 12340)  
Peter D. Protopapas (SC Bar No. 68304)  
Rikard & Protopapas, LLC  
1329 Blanding Street  
PO Box 5640 (29250)  
Columbia, SC 29201  
(803) 978-6111

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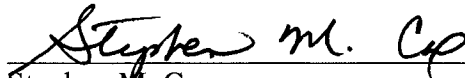
**SC Court of Appeals**

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PROOF OF SERVICE

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I hereby certify that I have served the foregoing Notice of Appeal on Respondents, Shriners Hospitals for Children; Dorraine Lester; Fred Townsend; and Howard Townsend by depositing a copy of said Notice in the United States Mail, postage prepaid, on December 28, 2018, addressed to Respondents' attorneys of record, Robert G. Rikard and Peter D. Protopapas, PO Box 5640, Columbia, SC 29250. Respondents' attorney will also be notified via the Richland County Court of Common Pleas electronic filing system.

  
Stephen M. Cox

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ROBINSON  
BRADSHAW

December 28, 2018

scox@robinsonbradshaw.com  
803.325.2910 : Direct Phone  
803.985.3782 : Direct Fax

**VIA COURIER – HAND DELIVERY**

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

Re: ***Shriners Hospitals for Children, et al. v. Wells Fargo Clearing Services, LLC d/b/a Wells Fargo Advisors, LLC, et al.***  
Case No. 2017-CP-40-07131

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the Notice of Appeal on the respondents.
- (2) A copy of the orders which are to be challenged on appeal.
- (3) A filing fee of \$250.00.

Very truly yours,

ROBINSON, BRADSHAW & HINSON, P.A.

  
Stephen M. Cox

SMC/wkh

Enclosures

cc: Robert G. Rikard (w/encls.)  
Peter D. Protopapas (w/encls.)  
Rikard & Protopapas, LLC  
PO Box 5640  
Columbia, SC 29250

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