

89165

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Circuit Court Judge J. C. Nicholson, Jr.

**RECEIVED**

FEB 28 2019

SC Court of Appeals

Case No. 2013-CP-10-3210

Alvar R. Rissanen, Michael H. Baxley,  
Clifford W. Forner, and Willie L. Hood,

Respondents,

v.

City of North Charleston,

Appellant.

**NOTICE OF APPEAL**

Caroline Cleveland  
Bob J. Conley  
Emmanuel J. Ferguson  
CLEVELAND & CONLEY, LLC  
171 Church Street, Suite 310  
Charleston, SC 29401  
Telephone: (843)577-9626  
[ccleveland@clevelandlaborlaw.com](mailto:ccleveland@clevelandlaborlaw.com)  
[bconley@clevelandlaborlaw.com](mailto:bconley@clevelandlaborlaw.com)  
[eferguson@clevelandlaborlaw.com](mailto:eferguson@clevelandlaborlaw.com)

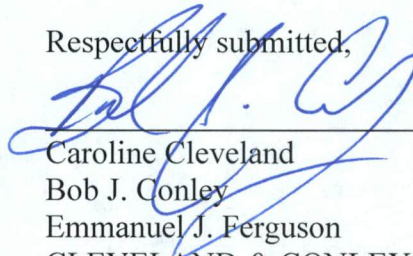
Attorneys for Respondent

TO THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Appellant City of North Charleston hereby appeals the Order of the Honorable J. C. Nicholson, Jr., attached as Exhibit A, dated November 9, 2018, and filed with the Charleston County Clerk of Court on November 13, 2018. Appellant received written notice of the entry of final judgment in the case on November 16, 2018, and, thereafter, served and filed a Motion to Alter or Amend on November 26, 2018.

The Honorable J. C. Nicholson, Jr. issued an Order, attached as Exhibit B, dated January 31, 2019, and filed with the Charleston County Clerk of Court on February 5, 2019, denying Appellant's Motion to Alter or Amend. Appellant received written notice of the Order denying its Motion to Alter or Amend on February 6, 2019.

Respectfully submitted,



---

Caroline Cleveland  
Bob J. Conley  
Emmanuel J. Ferguson  
CLEVELAND & CONLEY, LLC  
171 Church Street, Suite 310  
Charleston, SC 29401  
Telephone: (843)577-9626  
Facsimile: (843)577-6672  
[ccleveland@clevelandlaborlaw.com](mailto:ccleveland@clevelandlaborlaw.com)  
[bconley@clevelandlaborlaw.com](mailto:bconley@clevelandlaborlaw.com)  
[eferguson@clevelandlaborlaw.com](mailto:eferguson@clevelandlaborlaw.com)

Attorneys for Appellant

Charleston, South Carolina

Date: 2/26/19

Other Counsel of Record:

Nancy Bloodgood  
Lucy Sanders  
BLOODGOOD & SANDERS, LLC  
242 Mathis Ferry Road, Suite 201  
Mt. Pleasant, SC 29464  
T: (843) 972-0313  
[nbloodgood@bloodgoodsanders.com](mailto:nbloodgood@bloodgoodsanders.com)  
[lsanders@bloodgoodsanders.com](mailto:lsanders@bloodgoodsanders.com)

Attorney for Respondent

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Circuit Court Judge J. C. Nicholson, Jr.

---

Case No. 2013-CP-10-3210

---

Alvar R. Rissanen, Michael H. Baxley,  
Clifford W. Forner, and Willie L. Hood,

Respondents,

v.

City of North Charleston,

Appellant.

**RECEIVED**

FEB 28 2019

**SC Court of Appeals**

---

**PROOF OF SERVICE OF NOTICE OF APPEAL**

---

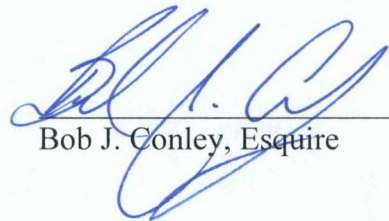
Caroline Cleveland  
Bob J. Conley  
Emmanuel J. Ferguson  
CLEVELAND & CONLEY, LLC  
171 Church Street, Suite 310  
Charleston, SC 29401  
Telephone: (843)577-9626  
Email: [ccleveland@clevelandlaborlaw.com](mailto:ccleveland@clevelandlaborlaw.com)  
[bconley@clevelandlaborlaw.com](mailto:bconley@clevelandlaborlaw.com)  
[eferguson@clevelandlaborlaw.com](mailto:eferguson@clevelandlaborlaw.com)

Attorneys for Appellant

I hereby certify that on February 26, 2019, I served a copy of the Notice of Appeal  
on the following:

Nancy Bloodgood  
Lucy Sanders  
BLOODGOOD & SANDERS, LLC  
242 Mathis Ferry Road, Suite 201  
Mt. Pleasant, SC 29464

by placing a copy of said document in the United States mail with sufficient postage thereon.



---

Bob J. Conley, Esquire

Charleston, South Carolina

Date: February 26, 2019

CLEVELAND & CONLEY, L.L.C.  
LABOR AND EMPLOYMENT DEFENSE

ONE SEVENTY ONE CHURCH STREET, SUITE 310  
CHARLESTON, SOUTH CAROLINA 29401  
WWW.CLEVELANDANDCONLEY.COM

CAROLINE WRENN CLEVELAND †  
BOB J. CONLEY  
EMMANUEL J. FERGUSON

†CERTIFIED SPECIALIST  
LABOR & EMPLOYMENT LAW

TELEPHONE: (843) 577-9626  
FACSIMILE: (843) 577-6672

February 26, 2019

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

RECEIVED  
FEB 28 2019  
SC Court of Appeals

Re: *Alvar R. Rissanen et al. v. City of North Charleston*  
Civil Action No.: 2013-CP-10-03210

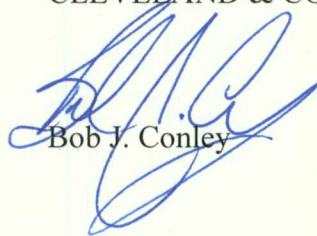
Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal on the Respondents. 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 challenged on appeal; and,
- (3) A filing fee of \$250.00.

Yours truly,

CLEVELAND & CONLEY, LLC

  
Bob J. Conley

BJC/lmp  
Enclosure: as stated  
cc: Nancy Bloodgood, Esquire



\$1.76  
US POSTAGE  
02/26/2019  
From 29401  
0 lbs 6 ozs



Pitney Bowes 022W0001125328

9051687695

**USPS FIRST-CLASS™ MAIL**

Cleveland & Conley, LLC  
171 Church St, Ste 310  
Charleston SC 29401-3140

**B012**

THE HONORABLE JENNY KITCHINGS  
CLERK, SOUTH CAROLINA COURT OF APPEALS  
PO BOX 11629  
COLUMBIA SC 29211-1629

**RECEIVED**

**FEB 28 2019**

**SC Court of Appeals**

