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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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MAY 08 2019

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III, Circuit Court Judge

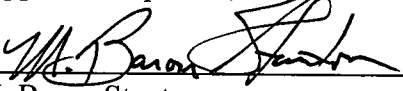
Case No. 2016-CP-40-00100

Hills Machinery Company, LLC, ..... Respondent-Cross Appellant,  
v.

Jackson Development Group, LLC, and J. Elliott Summey, ..... Appellants-Cross Respondents.

NOTICE OF APPEAL

Plaintiff, Hills Machinery Company, LLC, appeals the order of The Honorable Doyet A. Early, III, dated February 13, 2019. A second order taxed attorney's fees and costs, and a third order denied the motion of the defendants, Appellants-Cross Respondents Jackson Development and J. Elliott Summey to reconsider Appellant received written notice of entry of the third order March 28, 2019 and said defendants served notice of appeal on April 11, 2019.

  
M. Baron Stanton S.C. Bar # 7970  
Attorney for Plaintiff-Respondent-Cross-Appellant  
STANTON LAW OFFICES, P.A.  
P. O. Box 245  
Columbia, South Carolina 29202  
803-929-1484

Date: 4-25-19

Other Counsel of Record:

Tucker S. Player, Esquire  
Attorney for Defendants  
P.O. Box 21005  
Columbia, SC 29221  
803-772-8008

Arnold Goodstein, Esquire  
Attorney for Defendants  
208 Sumter Avenue  
Summerville, SC 29483  
843-871-1000

Jenny A. Horne, Esquire  
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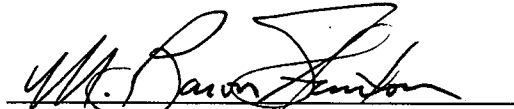
Jackson Development Group, LLC, and J. Elliott Summey, ..... Appellants-Cross Respondents.

CERTIFICATE OF SERVICE

I, M. Baron Stanton, do hereby certify that I have, on April 25, 2019, served the foregoing  
**Notice of Appeal** upon Defendants-Appellants-Cross-Respondents or attorney(s) for same by  
causing a copy thereof to be mailed with proper postage to the address(es) indicated below:

Tucker S. Player, Esquire  
Attorney for Defendants  
P.O. Box 21005  
Columbia, SC 29221

Arnold Goodstein, Esquire  
Attorney for Defendants  
208 Sumter Avenue  
Summerville, SC 29483

  
M. Baron Stanton

Date: 4-25-19

STANTON LAW OFFICES, P.A.

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1728 MAIN STREET  
COLUMBIA, SOUTH CAROLINA 29201

May 6, 2019

TELEPHONE 803-929-1484  
TELECOPIER/FAX 803-929-0534

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

M. BARON STANTON  
ATTORNEY AT LAW  
**RECEIVED**

MAY 08 2019

SC Court of Appeals

Re: **Hills Machinery Company, LLC** v. Jackson Development Group, LLC, and  
J. Elliott Summey,  
Richland County Court of Common Pleas, Case No. 16-CP-40-100  
Court of Appeals Appellate Case No. 2019-000623

Dear Ms. Kitchings:

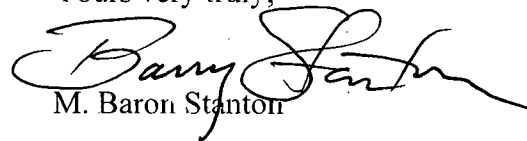
We enclose the following:

1. Respondent Hills Machinery's notice of cross appeal (bearing proof of service);
2. A copy of Judge Doyet A. Early, III's order dated February 13, 2019; and
3. The \$250.00 filing fee.

By copy of this letter, we are also filing a copy of the Notice of Appeal with the Richland County Court of Common Pleas.

With kind regards,

Yours very truly,

  
M. Baron Stanton

MBS:dmy  
Enclosures  
cc w/encl.:  
cc w/out encl.:

Ms. Jeanette W. McBride (Notice of Appeal , only)  
Tucker S. Player, Esquire  
Arnold S. Goodstein, Esquire  
Jenny A. Horne, Esquire

STANTON LAW OFFICES, P.A.

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SC Court of Appeals

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

