

**NOTICE OF APPEAL IN A CIVIL CASE**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable William Jeffrey Young, Circuit Court Judge

Case No. 2010-CP-26-5964

William H. BAILEY, Jr.,

Appellant,

vs.

CITY OF NORTH MYRTLE  
BEACH, a South Carolina  
Municipal Corporation,

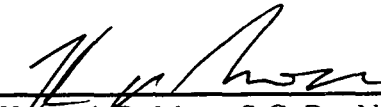
Respondent.

**NOTICE OF APPEAL**

William H. Bailey, Jr., by and through his undersigned attorneys, appeals the Order of the Honorable William Jeffrey Young dated November 13, 2012, for which Order a motion seeking reconsideration was denied on January 12, 2013. Appellant received a copy of the Order Denying Motion For Reconsideration on January 21, 2013. Copies of both Orders are attached hereto and made part of this Notice by reference.

Wright, Worley, Pope, Ekster & Moss, PLLC  
Attorneys for the Appellant

January 25, 2013

  
Kenneth R. Moss, S.C. Bar No. 15520  
2120 Sea Mountain Highway, Suite 200  
PO Box 4369  
North Myrtle Beach, SC 29597-4369  
Tel: 843/ 281-9901/ Fax: 843/ 281-9903

**RECEIVED**

JAN 28 2013

**SC Court of Appeals**

Other Counsel of Record:

Derwood L. Aydlette, III  
Christopher W. Johnson  
Gignilliat, Savitz & Bettis, LLP  
Attorneys for Respondent  
900 Elmwood Avenue, Suite 100  
Columbia, SC 29201  
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NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

62040

Honorable William Jeffrey Young, Circuit Court Judge

Case No. 20106-CP-26-5964

William H. BAILEY, Jr.,

Appellant,

vs.

CITY OF NORTH MYRTLE  
BEACH, a South Carolina  
Municipal Corporation,

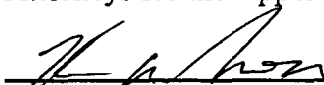
Respondent.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the Respondent, by depositing a copy of it in the United States Mail, postage prepaid, on January 25, 2013, addressed to their attorneys of record, Attorneys Aydlette and Johnson, Gignilliat, Savitz & Bettis, LLP, 900 Elmwood Avenue, Suite 100, Columbia, SC 29201.

Wright, Worley, Pope, Ekster & Moss, PLLC  
Attorneys for the Appellant

January 25, 2013

  
Kenneth R. Moss, S.C. Bar No. 15520  
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SC Court of Appeals

# WRIGHT, WORLEY, POPE, EKSTER & MOSS, PLLC

## ATTORNEYS AT LAW

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(1921 - 1994)

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\*\*licensed in SC & DC and Admitted to the U.S. Supreme Court

\*\*\*licensed only in SC, Certified Family Court Mediator, Guardian *ad Litem*

January 25, 2013

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

RE: William H. Bailey, Jr., Appellant, vs. City of North Myrtle Beach, a South Carolina Municipal Corporation, Respondent: Civil Action No. 2010-CP-26-5964

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 Respondent, by and through its attorneys.
- (2) A copy of the order which is to be challenged on appeal (attached to the Notice of Appeal).
- (3) A filing fee of \$100.

I have also enclosed an additional copy of each of the above for which I would very much appreciate your clocking receipt of and returning to me in the enclosed self-addressed envelope. Thank you for your time and attention to these matters.

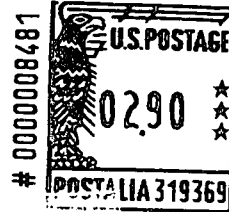
Sincerely,

  
Kenneth R. Moss

cc.

Client  
Derwood L. Aydlette, III, Esq.  
Christopher W. Johnson, Esq.

RECEIVED  
JAN 28 2013  
SC Court of Appeals



Kenneth R. Moss  
Wright, Worley, Pope, Ekster & Moss, PLLC  
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JAN 28 2013  
SC COURT OF APPEALS

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