

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2018-CP-26-6158

**RECEIVED**

JUL 08 2019

SC Court of Appeals

Kevin Ralph Richard .....Appellant,

v.

Facebook, Inc., a Delaware Corporation and and Maleko  
Kirk Malepai .....Respondents.

Of whom Facebook, Inc., a Delaware Corporation .....is the Respondent.

NOTICE OF APPEAL

Kevin Ralph Richard appeals the Order Granting Defendant Facebook's Motion to Dismiss of the Honorable Benjamin H. Culbertson dated May 22, 2019. Appellant received written notice of entry of this Order on May 22, 2019.

Kevin Ralph Richard further appeals the Order Denying Plaintiff's Motion to Reconsider Order of Dismissal as to Defendant Facebook of the Honorable Benjamin H. Culbertson dated June 4, 2019. Appellant received written notice of this Order on June 4, 2019.

June 25, 2019



Thomas C. Brittain, Esq.  
(Federal Bar No. 04920)  
Mary Madison Brittain Langway, Esq.  
(Federal Bar No. 10684)  
The Brittain Law Firm, P.A.  
4614 Oleander Drive  
Myrtle Beach, South Carolina 29577  
843-449-8562  
Attorneys for Appellant

Other Counsel of Record:

John R. Perkins, Jr., Esq.  
Perkins Law Firm, LLC  
200 North Main Street, Suite 301  
Greenville, SC 29601

William S. Hicks, Esq.  
*Pro Hav Vice*  
Keker, Van Nest & Peters, LLP  
633 Battery Street  
San Francisco, CA 94111

Attorneys for Respondent

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Kirk Malepei .....Respondents.

Of whom Facebook, Inc., a Delaware Corporation .....is the Respondent.

PROOF OF SERVICE

I, Allison Lazar, do hereby certify that I am an employee of THE BRITTAIN LAW FIRM, P.A., attorneys for the Appellant Kevin Ralph Richard in the above-entitled action, and that I have this 25<sup>th</sup> day of June, 2019, caused to be served upon the following parties the **Notice of Appeal with orders being challenged on appeal** by depositing a copy of same in the United States Mail, with sufficient first class postage affixed thereto, addressed as follows:

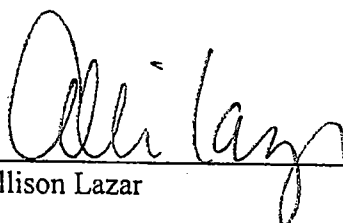
John R. Perkins, Jr., Esq.  
Perkins Law Firm, LLC  
200 North Main Street, Suite 301  
Greenville, SC 29601

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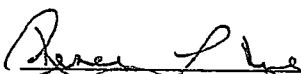
JUL 08 2019

SC Court of Appeals

William S. Hicks, Esq.  
*Pro Hav Vice*  
Keker, Van Nest & Peters, LLP  
633 Battery Street  
San Francisco, CA 94111

  
\_\_\_\_\_  
Allison Lazar

**SWORN AND SUBSCRIBED** before me  
this 25 day of June, 2019.

  
\_\_\_\_\_  
**NOTARY PUBLIC FOR SOUTH CAROLINA**  
My Commission Expires: 3/16/25

THE BRITTAIN LAW FIRM, P.A.  
ATTORNEYS AT LAW  
4614 OLEANDER DRIVE  
MYRTLE BEACH, SOUTH CAROLINA 29577

THOMAS C. BRITTAIN  
MARY MADISON BRITTAIN LANGWAY  
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June 25, 2019

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JUL 08 2019

SC Court of Appeals

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

Re: Kevin Ralph Richard v. Facebook, Inc., a Delaware Corporation and Maleko Kirk  
Malepeai  
CA No: 2018-CP-26-6158

Dear Ms. Kitchings:


Enclosed herewith for filing please find the original and one (1) copy of the following in the above-referenced matter, together with a check in the amount of \$250.00:

- 1) Notice of Appeal;
- 2) Orders which are being challenged on appeal;
- 3) Letter to court reporter requesting hearing transcript; and
- 4) Proof of Service.

Please file the originals and return the clocked-in copies to our office in the enclosed envelope. By copy of this letter I am serving opposing counsel as well as the lower court in this matter.

With warm regards, I am  
Yours truly,

THE BRITTAIN LAW FIRM, P.A.

  
Thomas C. Brittain  
TCB/all

cc: John R. Perkins, Jr., Esq.  
William S. Hicks, Esq.  
Horry County Clerk of Court

**THE BRITTAIN LAW FIRM, P.A.**

ATTORNEYS AT LAW  
4614 OLEANDER DRIVE  
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July 2, 2019

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

Re: Kevin Ralph Richard v. Facebook, Inc., a Delaware Corporation and Maleko Kirk  
Malepeai  
CA No: 2018-CP-26-6158

Dear Ms. Kitchings:

Pursuant to your letter of 28 June 2019, enclosed please find a copy of the Notice of Appeal, with all attachments, which has been filed with the trial court.

With warm regards, I am  
Yours truly,

**THE BRITTAIN LAW FIRM, P.A.**



Thomas C. Brittain  
TCB/all

cc: John R. Perkins, Jr., Esq.  
William S. Hicks, Esq.

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SC Court of Appeals

THE BRITTAIN LAW FIRM, P.A.

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June 7, 2019

Ms. Grace L. Hurley  
2960 Fowler School Road  
Green Sea, SC 29545

Re: Kevin Ralph Richard v. Facebook, Inc., a Delaware Corporation and Maleko Kirk  
Malepeai  
CA No: 2018-CP-26-6158

Dear Ms. Hurley:

In follow up to my email dated May 30, 2019, I am writing to request a copy of the transcript from the Motion to Dismiss heard before The Honorable Benjamin Culbertson at 1:00 pm on April 2, 2019 in the above-referenced case.

Please let me know if you need any additional information pertaining to this request at this time. Thank you.

With warm regards, I am  
Yours truly,

THE BRITTAI LAW FIRM, P.A.



Thomas C. Brittain  
TCB/all

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SC Court of Appeals



THE BRITAIN LAW FIRM, P.A.  
ATTORNEYS AT LAW  
4614 OLEANDER DRIVE  
MYRTLE BEACH, SOUTH CAROLINA 29577

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TO:

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

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JUL 08 2019  
SC Court of Appeals

