

91145

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appeal from Beaufort County  
Court of Common Pleas, Fourteenth Judicial Circuit  
Hon. Carmen T. Mullen, Circuit Court Judge

**RECEIVED**  
**OCT 14 2019**  
**SC Court of Appeals**

2018-CP-07-00422

Colleton River Plantation Club, Inc.,.....Respondent,

v.

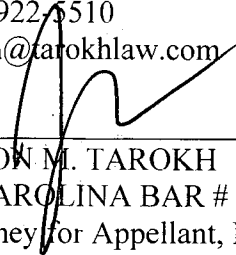
Equivest Financial, LLC, SweetCo Properties, LLC, Kenneth J. Foote and Mary Roe, of whom  
Equivest Financial, LLC, is the.....Appellant.

**NOTICE OF APPEAL**

Equivest Financial, LLC, appeals the Order Denying Motion for Summary Judgment, signed by the Honorable Carmen T. Mullen on September 11, 2019 and filed on September 12, 2019, in the above titled matter. The Appellant received written notice of the entry of the Order in this matter on September 12, 2019. A copy of the Order is attached hereto as required by Rule 203(d)(1)(B)(ii), SCACR.

Respectfully submitted,

TAROKH LAW, PLLC  
PO BOX 10827  
TAMPA, FL 33679  
813-922-5510  
jason@tarokhlaw.com

  
\_\_\_\_\_  
JASON M. TAROKH  
S. CAROLINA BAR # 72837  
Attorney for Appellant, Equivest Financial, LLC

October 10, 2019  
Tampa, Florida

Other Counsel of Record:

Barry L. Johnson, Esq.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909  
843-815-7121  
barry@jd-pa.com  
Counsel for Respondent, Colleton River Plantation Club, Inc.

S. Harrison Williams, Esq.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909  
843-815-7121  
harrison@jd-pa.com  
Counsel for Respondent, Colleton River Plantation Club, Inc.

Merritt G. Abney, Esq.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401  
843-853-5200  
merritt.abney@nelsonmullins.com  
Counsel for Respondent, Colleton River Plantation Club, Inc.

Shawn R. Willis, Esq.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401  
843-853-5200  
shawn.willis@nelsonmullins.com  
Counsel for Respondent, Colleton River Plantation Club, Inc.

and

SweetCo Properties, LLC  
c/o: CSC, the Registered Agent  
251 Little Falls Drive  
Wilmington, DE 19808

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appeal from Beaufort County  
Court of Common Pleas, Fourteenth Judicial Circuit  
Hon. Carmen T. Mullen, Circuit Court Judge

2018-CP-07-00422

**RECEIVED**  
OCT 14 2019  
SC Court of Appeals

Colleton River Plantation Club, Inc.,.....Respondent,

v.

Equivest Financial, LLC, SweetCo Properties, LLC, Kenneth J. Foote and Mary Roe, of whom  
Equivest Financial, LLC, is the.....Appellant.

**CERTIFICATE OF SERVICE**

I certify that on this date, October 10, 2019, I served a copy of the **Notice of Appeal** on all counsel of record and upon Defendant, SweetCo Properties, LLC, by mailing copies of the same with sufficient postage to their respective addresses as follows:

Barry L. Johnson, Esq. – Counsel for Respondent, Colleton River Plantation Club, Inc.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909

S. Harrison Williams, Esq. – Counsel for Respondent, Colleton River Plantation Club, Inc.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909

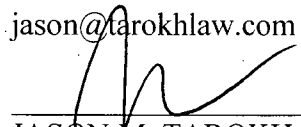
Merritt G. Abney, Esq. – Counsel for Respondent, Colleton River Plantation Club, Inc.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401

Shawn R. Willis, Esq. – Counsel for Respondent, Colleton River Plantation Club, Inc.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401

SweetCo Properties, LLC – Defendant  
c/o: CSC, the Registered Agent  
251 Little Falls Drive  
Wilmington, DE 19808

Respectfully submitted,

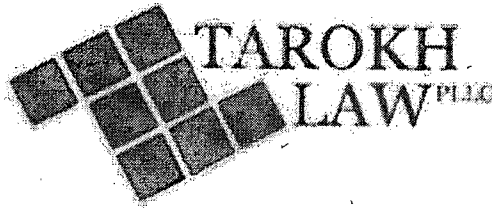
TAROKH LAW, PLLC  
PO BOX 10827  
TAMPA, FL 33679  
813-922-5510  
jason@tarokhlaw.com



---

JASON M. TAROKH  
S. CAROLINA BAR # 72837  
Attorney for Appellant, Equivest Financial, LLC

October 10, 2019  
Tampa, Florida



Florida | South Carolina  
www.tarokhlaw.com

**RECEIVED**  
OCT 14 2019  
SC Court of Appeals

PO Box 10827 | Tampa, Florida 33679 | T: 813-922-5510 | E: jason@tarokhlaw.com

October 10, 2019

**VIA U.S. MAIL**

Jerri Ann Roseneau  
Beaufort County Clerk of Court  
Post Office Drawer 1128  
Beaufort, SC 29901

**RE: Colleton River Planation Club, Inc., Respondent versus Equivest Financial, LLC, SweetCo Properties, LLC, Kenneth J. Foote, and Mary Roe, of whom Equivest Financial, LLC, is the Appellant.  
2018-CP-07-00422**

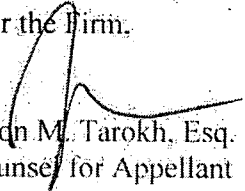
Dear Madam Clerk,

Enclosed please find the Appellant's, Equivest Financial, LLC, Notice of Appeal in the above titled matter. Additionally, I have included a certificate of service.

Please let me know if you have questions regarding the enclosed. Thank you.

Respectfully,

TAROKH LAW, PLLC  
For the Firm,

  
Jason M. Tarokh, Esq.  
Counsel for Appellant

cc:

Client

Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Barry L. Johnson, Esq.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909

S. Harrison Williams, Esq.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909

Merritt G. Abney, Esq.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401

Shawn R. Willis, Esq.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401

SweetCo Properties, LLC  
c/o: CSC, the Registered Agent  
251 Little Falls Drive  
Wilmington, DE 19808

Encls.



Florida | South Carolina  
www.tarokhlaw.com

PO Box 10827 | Tampa, Florida 33679 | T: 813-922-5510 | E: jason@tarokhlaw.com

October 10, 2019

**VIA U.S. MAIL**

Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**  
OCT 14 2019  
SC Court of Appeals

**RE: Colleton River Planation Club, Inc., Respondent versus Equivest Financial, LLC, SweetCo Properties, LLC, Kenneth J. Foote, and Mary Roe, of whom Equivest Financial, LLC, is the Appellant.**

**2018-CP-07-00422**

Dear Madam Clerk,

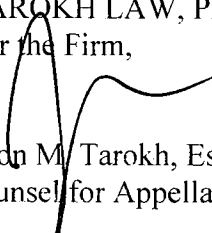
Enclosed please find the Appellant's, Equivest Financial, LLC, Notice of Appeal. Additionally, I have included a certificate of service, a check for the filing fee, as well as a copy of the correspondence sent to the Clerk of Court in Beaufort County.

By this letter, I also inform the Court that I will enroll as counsel of record. Please forward any and all future correspondence to my attention.

Please let me know if you have questions regarding the enclosed. Thank you.

Respectfully,

TAROKH LAW, PLLC  
For the Firm,

  
Jason M. Tarokh, Esq.  
Counsel for Appellant

cc:

Client

Beaufort County Clerk of Court  
Post Office Drawer 1128  
Beaufort, SC 29901

Barry L. Johnson, Esq.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909

S. Harrison Williams, Esq.  
**Johnson & Davis, PA**  
The Victoria Building, Suite 200  
10 Pinckney Colony Road  
Bluffton, SC 29909

Merritt G. Abney, Esq.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401

Shawn R. Willis, Esq.  
**Nelson Mullins Riley & Scarborough LLP**  
151 Meeting Street, Suite 600  
Charleston, SC 29401

SweetCo Properties, LLC  
c/o: CSC, the Registered Agent  
251 Little Falls Drive  
Wilmington, DE 19808

Encls.



TAROKH LAW, PLLC  
 PO BOX 10827  
 TAMPA, FL 33679  
 www.tarokhlaw.com

TAROKH LAW, PLLC  
 PO BOX 10827  
 TAMPA, FL 33679

**RECEIVED**  
 OCT 14 2019  
 SC Court of Appeals

Jenny Abbott Kitchings  
 Clerk, The South Carolina Court of Appeals  
 PO Box 11629  
 Columbia, SC 29211

POSTAL SERVICE.

Retail

**F**

US POSTAGE PAID

**\$5.30**

Origin: 33629  
 10/10/19  
 1189350609-23

FIRST-CLASS PKG SVC - RTL™

0 Lb 8.80 Oz

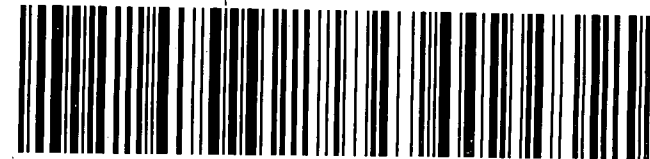
1026

**B012**

SHIP  
 TO:

PO BOX 11629  
 COLUMBIA SC 29211-1629

USPS TRACKING NUMBER



9500 1139 4268 9283 5742 66