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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL from Court of Common Pleas of CHARLESTON COUNTY

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

Appellate Case No. 2019-001726

RECEIVED
OCT 29 2019
SC Court of Appeals

Christine Harper.....Appellant

v.

City of North Charleston, John Wood,
individually, John Wood, d/b/a J & C Construction; J & C Construction;
and Charleston Moving and Storage Company,.....Respondents.

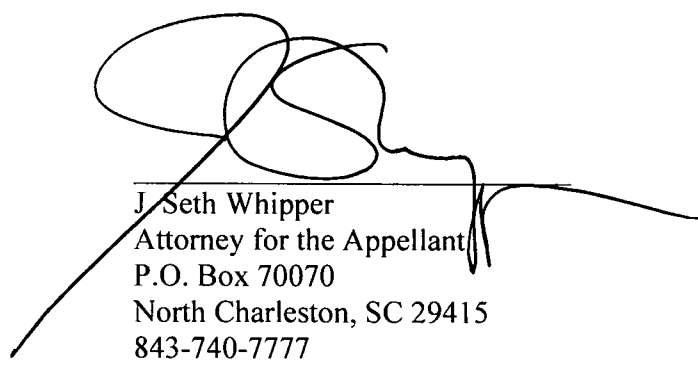
MOTION TO REINSTATE APPEAL

COMES NOW the Appellant, Christine Harper, to move this honorable Court to reinstate the appeal for the following reasons:

1. The trial court in it's order dated August 23, 2019 and noticed to Appellant on September 9, 2019 denied the Motion for Contempt;
2. The Legal argument and memoranda of law from Appellant and City of North Charleston were presented to the trial court on the issue of contempt;
3. The trial courts denial of the 'Motion for Contempt' is controlled by S.C. Code Ann. 14-3-330(2), (3), and (4) (2017);
4. The Appellant filed a 'Motion to Enforce Judgment' and the trial court's order is the response to that Motion.
5. The trial court's denial of contempt is an order which [involves the merits] and [finally determines some substantial matter forming the whole or a part of some causes of action or defense]. Mid-State Distributors, Inc. v. Century Importers, Inc. 310 S.C. 330,426 S.E.2d 777 (1993).

This motion is based on the South Carolina Rules of Court and Applicable law.

October 28, 2019



J. Seth Whipper
Attorney for the Appellant
P.O. Box 70070
North Charleston, SC 29415
843-740-7777

Other Counsel of Record:

Bruce A. Berlinsky

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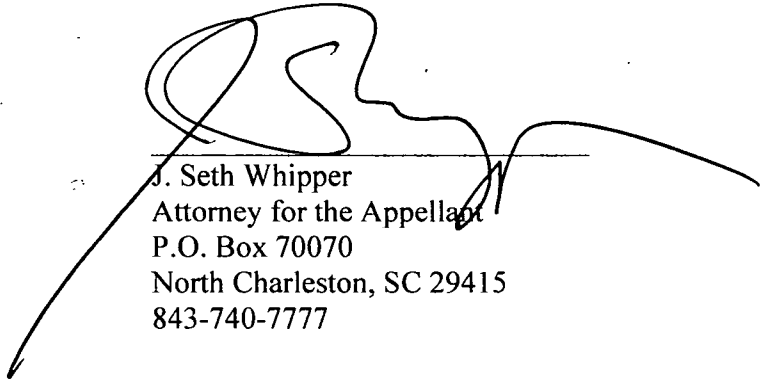
v.

City of North Charleston, John Wood,
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PROOF OF SERVICE

The undersigned hereby certifies that the true copy of the foregoing Appellant Motion to Reinstate Appeal have been served on the South Carolina Court of Appeals by depositing a copy to them in the United States Mail, postage prepaid, on October 28, 2019, addressed to Clerk, South Carolina Court of Appeals, Post Office Box 11629, Columbia, South Carolina 29211 and served the same on: Bruce Berlinsky, Attorney for Respondent, 1 Carriage Lane, Suite F, Charleston, SC 29907.

October 28, 2019



J. Seth Whipper
Attorney for the Appellant
P.O. Box 70070
North Charleston, SC 29415
843-740-7777

WHIPPER LAW FIRM

Attorneys and Counselors at Law

4592 Durant Avenue
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(843) 740-7777
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CHERYL WHIPPER HAMILTON
J. SETH WHIPPER

MAILING ADDRESS
POST OFFICE BOX 70070
NORTH CHARLESTON, SC 29415

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SC Court of Appeals

The Hon. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211-1629

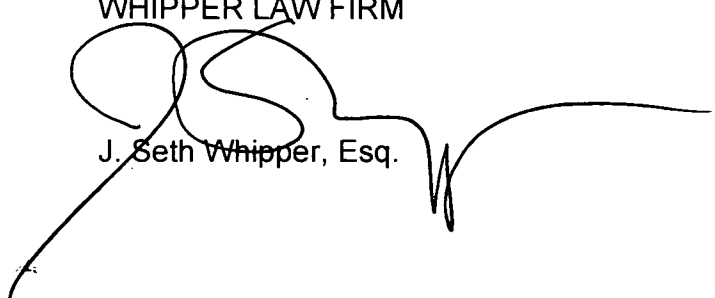
Re: **Christine Harper.....Appellant**
v.
City of North Charleston, John Wood, individually, John Wood, d/b/a J & C Construction; J & C Construction; and Charleston Moving and Storage Company.....Respondents
Appellate Case No.: 2019-001726
Motion to Reinstate Appeal- For Filing
Proof of Service- For Filing

Dear Ms. Kitchings:

Please find enclosed for filing, the Appellant Motion to Reinstate Appeal and Proof of Service. I am enclosing the original and (7) copies, (1) for conforming. Also, enclosed is Check #10611 in the amount \$50.00 for the requested filing fee. I am providing a self-addressed stamped envelope for your use in returning the conformed copy.

By copy of this letter, I am serving the same on Bruce A. Berlinsky, Counsel for the City of Charleston.

Sincerely,
WHIPPER LAW FIRM


J. Seth Whipper, Esq.

Enclosure
xc: Christine Harper (w/o encl.)

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL from Court of Common Pleas of CHARLESTON COUNTY

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

Appellate Case No. 2019-001726

Christine Harper.....Appellant

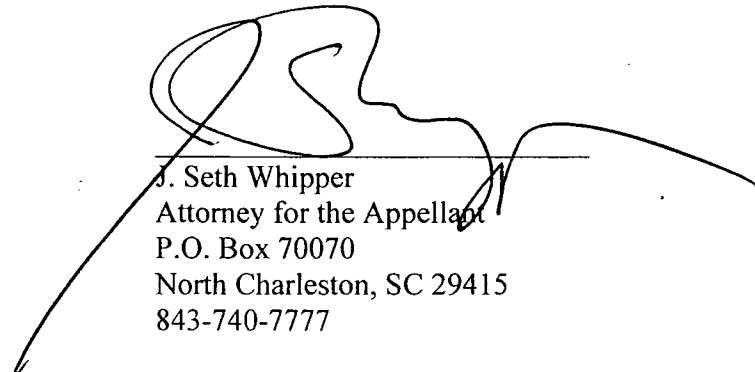
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October 28, 2019



J. Seth Whipper
Attorney for the Appellant
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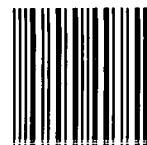
OCT 29 2019

SC Court of Appeals

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

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J. Seth Whipper, Esq
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P.O. Box 70070
North Charleston, SC 29415

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- Delivery Options
- No Saturday Delivery (delivered next business day)
 - Sunday/Holiday Delivery Required (additional fee, where available*)
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- *Refer to USPS.com or local Post Office™ for availability.

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SC Court of Appeals

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Date Accepted (MM/DD/YY)	Scheduled Delivery Time	Insurance Fee	COD Fee
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Time Accepted	10:30 AM Delivery Fee	Return Receipt Fee	Live Animal Transportation Fee
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Special Handling/Fragile	Sunday/Holiday Premium Fee	Total Postage & Fees	
\$	\$	<u>\$25.30</u>	
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lbs. ozs.			

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Delivery Attempt (MM/DD/YY)	Time	Employee Signature
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LABEL 11-B, MARCH 2019

PSN 7690-02-000-9996

PEEL FROM THIS CORNER