

Exhibit A

Notice of Appeal

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Charles B. Simmons, Jr., Master in Equity

Case No. 2018-CP-23-03124

Rallis Holdings, LLC,.....Appellant,

v.

Ivan Martinez, Paula Martinez and
Clear Skies Restoration, LLC,.....Respondents.

NOTICE OF APPEAL

Rallis Holdings, LLC appeals the orders of the Honorable Charles B. Simmons, Jr. filed September 4, 2019 and filed September 19, 2019. Appellant received written notice of the September 19, 2019 order on September 19, 2019.

[Signatures on following page.]

This the 18th day of October, 2019.

s/ A. Brooks Haselden
A. Brooks Haselden (S.C. Bar #78656)
Haselden, LLC
105 E. North Street, Suite 201
P.O. Box 9001 (29604)
Greenville, SC 29601
brooks@haseldenllc.com
(864) 293-5546

Counsel for Appellant, Rallis Holdings, LLC

Other Counsel of Record:

Michael B. Dodd
The Dodd Law Firm, LLC
1990 Augusta Street, Suite 2B
Greenville, SC 29605

Attorneys for the Respondents
Paula Martinez and Ivan Martinez

M. Stokely Holder
Holder, Padgett, Littlejohn & Prickett, LLC
110 W. North Street, Suite 100
Greenville, SC 29601

Attorney for Respondent
Clear Skies Restoration, LLC

Andrew F. Carson
Wilson Jones Carter & Baxley, P.A.
872 S. Pleasantburg Drive
Greenville, SC 29607

Attorney for Oriole Properties, LLC

Exhibit B

Proof of Service

Certificate of Electronic Notification

Recipients

M. Holder - Notification transmitted on 10-18-2019 03:16:01 PM.

Michael Dodd - Notification transmitted on 10-18-2019 03:16:01 PM.

Kevin Brady - Notification transmitted on 10-18-2019 03:16:01 PM.

Clayton Custer - Notification transmitted on 10-18-2019 03:16:01 PM.

Andrew Carson - Notification transmitted on 10-18-2019 03:16:01 PM.

A. Haselden - Notification transmitted on 10-18-2019 03:16:01 PM.

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SC Court of Appeals

***** IMPORTANT NOTICE - READ THIS INFORMATION *****

NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2018CP2303124

Official File Stamp: 10-18-2019 03:15:47 PM

Court: CIRCUIT COURT

Common Pleas

Greenville

Case Caption: Clear Skies Restoration LLC , plaintiff, et al vs.
Ivan Martinez , defendant, et al.

Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals

Filed by or on behalf of: A. Brooks Haselden

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Kevin Phillip Brady for Oriole Properties Llc, Rallis Holdings Llc

Andrew Finley Carson for Oriole Properties Llc

A. Brooks Haselden for Rallis Holdings Llc, Rallis Holdings Llc

M. Stokely Holder for Clear Skies Restoration LLC

Michael Bland Dodd for Ivan Martinez, Paula A Martinez

Clayton Monroe Custer for Rallis Holdings Llc, Oriole Properties Llc

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

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HASELDEN, LLC

A. Brooks Haselden
(864) 293-5546
brooks@haseldenllc.com

October 28, 2019

Via U.S. Mail

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

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SC Court of Appeals

RE: *Clear Skies Restoration, LLC v. Ivan Martinez and Paula Martinez, 2018-CP-23-03124 - Notice of Appeal of Third-Party Petitioner/Appellant Rallis Holdings, LLC*

Dear Sir or Madam:

Enclosed for filing in the South Carolina Court of Appeals are the following documents in the above-referenced matter:

Exhibit A: Notice of Appeal filed with the Clerk of Court for Greenville County, South Carolina;

Exhibit B: Proof of Service of the Notice of Appeal;

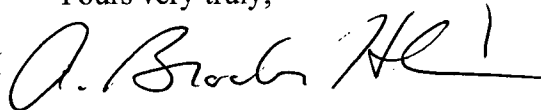
Exhibit C: Order of the Hon. Charles B. Simmons, Jr. dated September 4, 2019;

Exhibit D: Order of the Hon. Charles B. Simmons, Jr. dated September 19, 2019;

Also enclosed is a filing fee in the amount of \$250.00. Rallis Holdings, LLC requests that its appeal be consolidated with that of Third-Party Petitioner/Appellant Oriole Properties, LLC, which has also filed a notice of appeal in this matter and whose issues of law and fact are identical to those of Rallis Holdings, LLC.

Please do not hesitate to contact me if you have any questions regarding these items.

Yours very truly,



A. Brooks Haselden

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864-293-5546
brooks@haseldenllc.com

cc: Andrew Carson, Esq.
M. Stokely Holder, Esq.
Michael B. Dodd, Esq.

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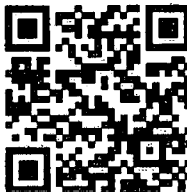
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