

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite D. Murphy, Circuit Court Judge

Civil Action No.: 2012-CP-18-1227

Innovative Waste Management Inc., Crest Energy Partners,
LP, Edward Girardeau. Plaintiffs, Of Whom,

Innovative Waste Management, Inc. is the Respondent\,

v.

Crest Energy Partners, GP, LLC, Dunhill Products GP, LLC,
Henry Wuertz, Innovative Waste Management, Inc., Crest
Energy Partners LP, Dunhill Products LP, Edward H.
Girardeau, C. Russ Lloyd, Defendants, Of Whom,

Crest Energy Partners GP, LLC, Crest Energy Partners LP,
Dunhill Products, LP, and Henry Wuertz, are the
Respondents.

NOTICE OF APPEAL

COMES NOW DEFENDANTS / APPELLANTS Crest Energy Partners GP, LLC,
Crest Energy Partners LP, Dunhill Products, LP, and Henry Wuertz, who hereby give
Notice that they Appeal the Order of the Hon. Maite Murphy, dated October 1, 2019

(Exhibit A), inclusive of the prior Orders of August 1, 2019 (Exhibit B), inclusive of the Orders dated of June 18, 2019 (Exhibit C) and April 6, 2015 (Exhibit D).

RESPECTFULLY SUBMITTED:

s/ David B. Marvel
David B. Marvel
P.O. Box 22734
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ATTORNEY FOR THE APPELLANTS

Charleston, South Carolina
October 9, 2019

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Maite D. Murphy, Circuit Court Judge

Case No. 2019-001719

Innovative Waste Management Inc., Respondent,

v.

Crest Energy Partners, GP, LLC, Dunhill Products GP, LLC, Henry
Wuertz, Innovative Waste Management, Inc., Crest Energy Partners
LP, Dunhill Products LP, Edward H. Girardeau, C. Russ Lloyd,
Defendants, Of Whom,

Crest Energy Partners GP, LLC, Crest Energy Partners LP, Dunhill
Products, LP, and Henry Wuertz, are the Appellants.

AMENDED PROOF OF SERVICE

I certify that on October 9, 2019, I served the Notice of Appeal on the Respondent, Innovative Waste Management, Inc., by delivering a copy to its attorneys, Wm. Michael Gruenloh, Thomas Drazen, Frederick Jekel, and Brian Holmes, pursuant to Section 4(e), SCEF and the requirements of Rule 262, SCACR, via the South Carolina Judicial Department's Electronic Filing System. Copies of the Notice of Electronic Filing and Accepted Filing Notice establishing proof of such service appear as Exhibit A to this Amended Proof of Service.

[signature block appears on the following page]

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RESPECTFULLY SUBMITTED:



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ATTORNEY FOR THE APPELLANTS

November 8, 2019
Charleston, South Carolina

Certificate of Electronic Notification

Recipients
Thomas Drazan - Notification transmitted on 10-09-2019 01:21:09 PM.
William Gruenloh - Notification transmitted on 10-09-2019 01:21:09 PM.
Brian Holmes - Notification transmitted on 10-09-2019 01:21:09 PM.
David Marvel - Notification transmitted on 10-09-2019 01:21:09 PM.
Maite Murphy - Notification transmitted on 10-09-2019 01:21:08 PM.
Patrick Chisum - Notification transmitted on 10-09-2019 01:21:09 PM.
Frederick Jekel - Notification transmitted on 10-09-2019 01:21:08 PM.
Angus Lawton - Notification transmitted on 10-09-2019 01:21:09 PM.



DAVID B. MARVEL

Attorney at Law • Proctor in Admiralty
Certified Civil and Federal Court Mediator
Admitted to Practice in South Carolina and Georgia

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November 8, 2019

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SC Court of Appeals

VIA FedEx 776940420185

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

Re: Innovative Waste Management v. Crest Energy Partners GP, LLC
Case No. 2019 -001719

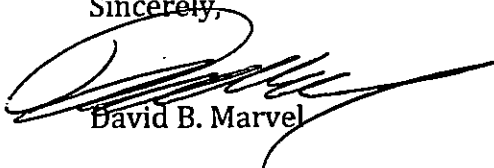
Dear Ms. Kitchings,

I hope this letter finds you well. I have enclosed an Amended Proof of Service in response to your letter of November 4, 2019. I have also enclosed a courtesy copy of the Notice of Appeal, including exhibits. Please file the Amended Proof of Service in your usual prompt and efficient manner. I will retrieve an electronic copy from the C-Track system.

On review of your letter, I am concerned that there may be a conflict between Section 4(e) of the Electronic Filing Rules and Rule 262 of the Appellate Court Rules. In the event the Court feels this may affect appellate jurisdiction, I respectfully request that the Court direct the parties to brief that issue without requiring a formal motion from any party.

Thank you, as always, for your assistance with this matter. If you have any questions, comments, or concerns, please do not hesitate to contact me at any time. With best regards, I remain

Sincerely,



David B. Marvel

/DBM

Enclosures

Cc: Wm. Michael Gruenloh

(Via FedEx 776940753141, with enclosures)

ORIGIN ID:RBWA (843) 853-4877
DAVID MARVEL

220 CHURCH ST, SUITE 101

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UNITED STATES US

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COLUMBIA SC 29201

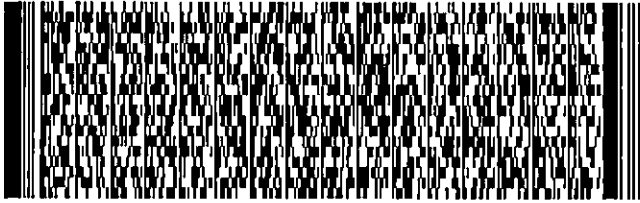
(803) 734-1890

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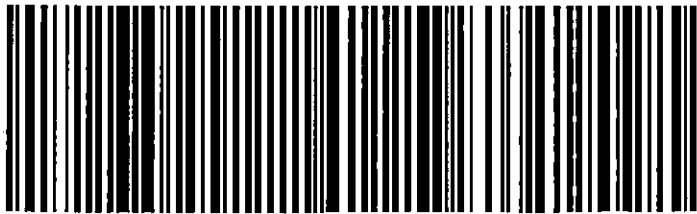
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SC Court of Appeals

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