

9/14/17

Dennis Law Firm, LLC
Edward J. Dennis, IV
Attorney and Counselor at Law
112 Stoney Avenue
Moncks Corner, SC 29461
(843) 761-5212 (843) 761-5214/fax
ejdiv@homesc.com

November 13, 2019

Clerk of Court, South Carolina Court of Appeals
Attn: Jenny Kitchings
Post Office Box 11629
Columbia, SC 29211


RECEIVED
NOV 15 2019
SC Court of Appeals

RE: Ross Morrison Marlowe
Case No.: 2019-CP-08-00742

Dear Ms. Kitchings:

Enclosed herewith for service upon you and filing is the original and two (2) copies of the Notice of Appeal and Proof of Service(s) with the corrections per your letter, also enclosed. I have also enclosed a copy of the Order to be appealed as well as the \$250 filing fee. Could you please file the same and return the copies to me in the self-addressed stamped envelope provided.

Sincerely,
DENNIS LAW FIRM, L.L.C.



Edward J. Dennis, IV
Attorney at Law

EJDIV/ljm

Enclosure: as stated

Cc: client via email

Matthew R. Sanford, Assistant Solicitor, 300 California Ave, Moncks Corner, SC
29461 843/719-4529 Fax 843/719-4588, via email



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

November 04, 2019

Mr. Edward J. Dennis, IV, Esquire
112 Stoney Ave.
Moncks Corner SC 29461

Re: Ross Morrison Marlowe v. City of Goose Creek
Appellate Case No. 2019-001832

Dear Counsel:

Upon reviewing your notice of appeal, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and each deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed:

- The accompanying proof of service is not in compliance with the SCACR. Specifically, the proof of service does not state that a copy of the notice of appeal has been served on the respondent's counsel. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- The filing fee amount submitted is incorrect. The correct filing fee is \$250.00 pursuant to the order of the Supreme Court dated October 9, 2018. We are returning your check in the amount of \$100.00.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Matthew Richard Sanford, Esquire

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Common Pleas Court

The Honorable Jennifer B. McCoy

Case No. 2019-CP-08-00742

Ross Morrison Marlowe.....Appellant,

v.

City of Goose Creek.....Respondent.

NOTICE OF APPEAL

Ross Morrison Marlowe appeals the Order of Jennifer B. McCoy dated October 1, 2019, and filed on October 1, 2019. Appellant received notice via Electronic Mail of this Order on October 1, 2019.

October 10, 2019



DENNIS LAW FIRM, L.L.C.
Edward J. Dennis, IV
Attorney at Law
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Moncks Corner, SC 29461
843/761-5212
Fax: 843/761-5214

Other Counsel of Record:
Matthew R. Sanford, Esquire
Assistant Solicitor
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OCT 30 2019
SOUTH CAROLINA

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Common Pleas Court

The Honorable Jennifer B. McCoy

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October 10, 2019



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Other Counsel of Record:
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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
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Case No. 2019-CP-08-00742

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APPEAL FROM BERKELEY COUNTY
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The Honorable Jennifer B. McCoy

Case No. 2019-CP-08-00742

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City of Goose Creek.....Respondent.

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SC Court of Appeals

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Berkeley
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2019CP0800742

Ross Morrison Marlowe
PLAINTIFF(S)

City Of Goose Creek et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

Upon hearing arguments and reviewing the cases and memoranda submitted from both sides, this court respectfully denies the appeal and does not find an error of law from the trial court.

ORDER INFORMATION

This order ends does not end the case.

See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 10/01/2019.

Goose Creek Municipal Court
State of South Carolina

RECEIVED
OCT 30 2019
SC Court of Appeals

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Zimbra

ejdiv@homesc.com

Courtesy NEF RE: 2019CP0800742

From : efiledonotreply@sccourts.org
Subject : Courtesy NEF RE: 2019CP0800742
To : ejdiv@homesc.com

Thu, Oct 10, 2019 01:33 PM

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2019CP0800742

Official File Stamp: 10-10-2019 01:32:50 PM
Court: CIRCUIT COURT
Common Pleas
Berkeley

Case Caption: Ross Morrison Marlowe VS City Of Goose Creek

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

Filed by or on behalf of: Edward J. Dennis, IV

RECEIVED
OCT 30 2019
SC Court of Appeals

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

The following people were served electronically:

Matthew Richard Sanford for City Of Goose Creek
Edward J. Dennis, IV for Ross Morrison Marlowe

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

Goose Creek Municipal Court
State of South Carolina

~~~~ CONFIDENTIALITY NOTICE ~~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Common Pleas Court

The Honorable Jennifer B. McCoy

Case No. 2019-CP-08-00742

Ross Morrison Marlowe.....Appellant,

v.

City of Goose Creek.....Respondent.

NOTICE OF APPEAL

Ross Morrison Marlowe appeals the Order of Jennifer B McCoy dated October 1, 2019, and filed on October 1, 2019. Appellant received notice via Electronic Mail of this Order on October 1, 2019.

October 10, 2019

Edward J. Dennis, IV  
DENNIS LAW FIRM, L.L.C.  
Edward J. Dennis, IV  
Attorney at Law  
BAR # 01638  
112 Stoney Avenue  
Moncks Corner, SC 29461  
843/761-5212 Fax: 843/761-5214

Other Counsel of Record:  
Matthew R. Sanford  
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SC Court of Appeals

STATE OF SOUTH CAROLINA  
COUNTY OF Berkeley  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2019CP0800742

Ross Morrison Marlowe  
PLAINTIFF(S)

City Of Goose Creek et al  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
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 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRCP;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
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- STAYED DUE TO BANKRUPTCY**
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 Affirmed;  Reversed;  Remanded;  
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NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

Upon hearing arguments and reviewing the cases and memoranda submitted from both sides, this court respectfully denies the appeal and does not find an error of law from the trial court.

**ORDER INFORMATION**

This order  ends  does not end the case.  See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 10/01/2019.

Goose Creek Municipal Court  
State of South Carolina

**RECEIVED**  
OCT 30 2019  
SC COURT OFFICE

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

---

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF BERKELEY )  
 )  
ROSS MORRISON MARLOWE, )  
Appellant, )  
 )  
vs. )  
 )  
CITY OF GOOSE CREEK, )  
Respondent. )

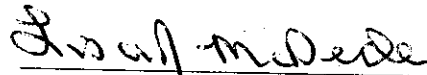
IN THE COMMON PLEAS COURT  
NINTH JUDICIAL CIRCUIT  
CASE NO.: 2019-CP-08-00742

**AFFIDAVIT OF  
ELECTRONIC DELIVERY**

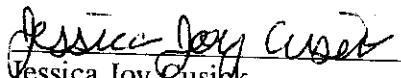
PERSONALLY appeared before me, Lisa J. McDede, who, being first duly sworn deposes and says as follows:

I am a paralegal at the Dennis Law Firm, LLC and work for Edward J. Dennis, IV. On October 10, 2019, at 1:32 pm I filed the Notice of Appeal which was served upon Matthew Richard Sanford for City of Goose Creek via efile, Notice is attached hereto.

**FURTHER AFFIANT SAYETH NOT!**

  
Lisa J. McDede

SWORN to before me this  
13th day of November, 2019

  
Jessica Joy Cusick  
Notary Public for South Carolina  
My Commission Expires: 9/13/2029

**RECEIVED**

NOV 15 2019

SC Court of Appeals



\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

---

**A filing has been submitted to the court RE:** 2019CP0800742

**Official File Stamp:** 10-10-2019 01:32:50 PM  
**Court:** CIRCUIT COURT  
Common Pleas  
Berkeley  
**Case Caption:** Ross Morrison Marlowe VS City Of Goose Creek  
**Document(s) Submitted:** Appeal/Notice of Appeal to Court of Appeals  
**Filed by or on behalf of:** Edward J. Dennis, IV

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

---

**The following people were served electronically:**

Matthew Richard Sanford for City Of Goose Creek  
Edward J. Dennis, IV for Ross Morrison Marlowe

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

Goose Creek Municipal Court  
State of South Carolina

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF BERKELEY )  
 )  
ROSS MORRISON MARLOWE, )  
Appellant, )  
 )  
vs. )  
 )  
CITY OF GOOSE CREEK, )  
Respondent. )

IN THE COMMON PLEAS COURT  
NINTH JUDICIAL CIRCUIT  
CASE NO.: 2019-CP-08-00742

**AFFIDAVIT OF HAND DELIVERY**

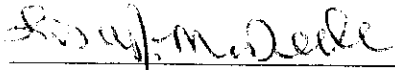
I, Edward J. Dennis, IV, hereby certify that a certified true copy of the *Notice of Appeal and Affidavit of Hand Delivery* was hand delivered on October 28, 2019, to:

City of Goose Creek  
519 N. Goose Creek Blvd.  
Goose Creek, SC 29445



Edward J. Dennis, IV  
Attorney at Law

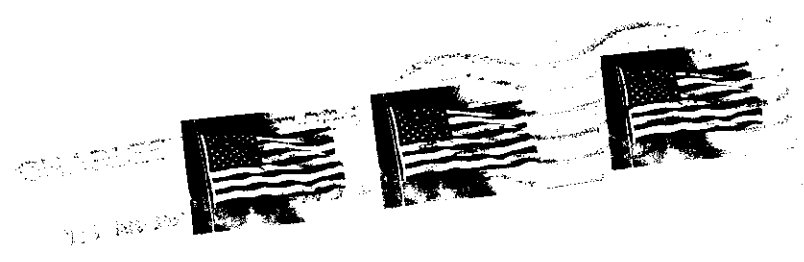
SWORN to before me this  
28<sup>th</sup> day of October, 2019



Lisa J. McDede  
Notary Public for South Carolina  
My Commission Expires: 7/26/26

**RECEIVED**  
OCT 30 2019  
SC Court of Appeals

ennis Law Firm, LLC  
ward J. Dennis, IV  
Stoney Avenue  
icks Corner, SC 29461



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NOV 15 2019

SC Court of Appeals

Clerk of Court, South Carolina Court of Appeals  
Attn: Jenny Kitchings  
Post Office Box 11629  
Columbia, SC 29211

29211-162929

