

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
NOV 27 2019
SC Court of Appeals

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

Case No. 2016-CP-14-00198

Rebecca J. Robbins and Marie Babayan, individually
and on behalf of all those similarly situation, Appellants,

v.

Town of Turbeville and the Turbeville Police Department, Respondents,

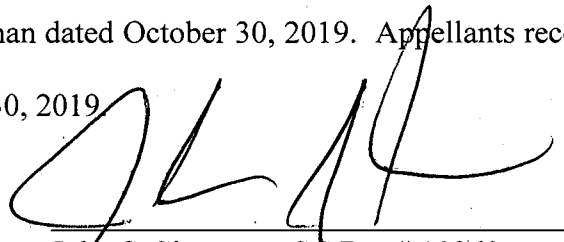
v.

The State of South Carolina, Third Party Defendant.

NOTICE OF APPEAL

Rebecca J. Robins and Marie Babayan, individually and on behalf of all those similarly situated appeal the Order Denying Plaintiffs' Motion for Summary Judgement, Granting Defendants' Motion for Summary Judgement, and Denying Plaintiffs' Motion for Class Certification, of the Honorable Clifton B. Newman dated October 30, 2019. Appellants received written notice of entry of this order on October 30, 2019.

November 27, 2019



John S. Simmons, SC Bar # 10260
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Attorney for Appellants

Other Counsel of Record:

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Attorneys for Respondents Town of
Turbeville and the Turbeville Police Department

J. Emory Smith, Jr. # 5262
S.C. Attorney General's Office
P.O. Box 11549
Columbia, SC 29211
(803) 734-3680

Attorney for Third Party Defendant
State Of South Carolina

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and on behalf of all those similarly situation, Appellants,

v.

Town of Turbeville and the Turbeville Police Department, Respondents,

v.

The State of South Carolina, Third Party Defendant.

PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal for the Simmons Law Firm, LLC, have served the Notice of Appeal on upon the Clarendon County Court of Common Pleas Clerk of Court by electronic filing and upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on November 27, 2019, addressed as follows:

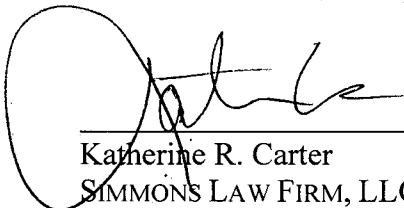
John S. Wilkerson, III
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P.O. Box 11549
Columbia, SC 29211

The Honourable Beulah G. Roberts
Clerk of Court - Clarendon County
Via Upload through SCE-File

November 27, 2019

A handwritten signature in black ink, appearing to read 'K. Carter', written over a horizontal line.

Katherine R. Carter
SIMMONS LAW FIRM, LLC
PO Box Five
Columbia, SC 29202
(803) 779-4600


SIMMONS
LAW FIRM

Reply to:
KATHERINE R. CARTER
kcarter@simmonsfirm.com

November 27, 2019

Via Hand Delivery

The Honorable Jenny Kitchings
Clerk of Court, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

**RE: Rebecca J. Robbins, et al. v. Town of Turbeville, et al.
C/A No. 2016-CP-14-00198**

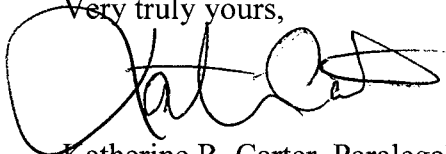
Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above case. Also enclosed are the following:

1. Proof of Service of the notice of appeal on the Respondents;
2. A copy of the order which is to be challenged on appeal;
3. A filing fee of \$250.00; and
4. A copy of our letter to the Court Reporter requesting the transcript and confirming that we agree to pay the per page charge as provided by Rule 607, SCACR.

Please have your staff clock in the copy of the Notice of Appeal and return the clocked copy with our courier.

With kind regards, I am

Very truly yours,


Katherine R. Carter, Paralegal

/krc
Enclosure(s) as stated

cc: John S. Wilkerson, III, Esq.
Richard S. Dukes, Jr., Esq.
William H. Johnson, Esq.
J. Emory Smith, Jr., Esq.
Clerk of Court, Clarendon County Ct of Common Pleas (*via electronic filing*)