

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas, Master-in-Equity

**RECEIVED**

Mikell R. Scarborough, Master-in-Equity Judge

FEB 20 2020

SC Court of Appeals

Civil Action No. 2016-CP-10-04211

Born Capital, LLC,

Appellant,

vs.

Carolina Beauregard,

Respondent.

NOTICE OF APPEAL

Appellant Born Capital, LLC, respectfully appeals from the Order and Judgment electronically signed by the Honorable Mikell R. Scarborough on January 17, 2020 and entered on January 21, 2020.

Appellant received written notice of the Order by NEF/electronic filing of the Order by the Judge on January 21, 2020.

*[Signature of counsel on following page]*

Respectfully submitted,

**POPE FLYNN, LLC**



---

R. Patrick Flynn, Esquire  
Michael W. Allen, Jr., Esquire  
P.O. Box 70  
Charleston, SC 29402  
[pflynn@popeflynn.com](mailto:pflynn@popeflynn.com)  
[mallen@popeflynn.com](mailto:mallen@popeflynn.com)  
(843) 790-9570

*Attorneys for Appellant Born Capital, LLC*

February 17, 2020

Other Counsel of Record:

Julia P. Copeland, Esq.  
Hinchey, Murray & Pagliarini, LLC  
56 Folly Road Blvd.  
Charleston, SC 29407  
[jcopeland@lawyershmp.com](mailto:jcopeland@lawyershmp.com)  
(843) 577-7455

*Attorney for Respondent Caroline Beauregard*

Clayton B. McCullough, Esq.  
Ross A. Appel, Esp.  
McCullough Khan, LLC  
359 King Street, Suite 200  
Charleston, SC 29401  
[clay@mklawsc.com](mailto:clay@mklawsc.com)  
[ross@mklawsc.com](mailto:ross@mklawsc.com)  
(843) 937-0400

*Attorneys for Plaintiff William E. Danielson*

Tyler Beauregard  
816 Acoma Street, Apt. 203  
Denver, CO 80204  
[tyler@eastinletpartners.com](mailto:tyler@eastinletpartners.com)  
*Pro Se Defendant*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas, Master-in-Equity

Mikell R. Scarborough, Master-in-Equity Judge

Civil Action No. 2016-CP-10-04211

RECEIVED  
FEB 20 2020  
SC Court of Appeals

Born Capital, LLC,

Appellant,

vs.

Carolina Beauregard,

Respondent.

PROOF OF SERVICE

The undersigned certifies that a copy of the Notice of Appeal has been served upon the counsel of record listed below by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below on this 17<sup>th</sup> day of February, 2020 and electronic filing.

Julia P. Copeland, Esq.  
Hinchey, Murray & Pagliarini, LLC  
56 Folly Road Blvd.  
Charleston, SC 29407  
**Attorney for Respondent**  
**Caroline Beauregard**

Clayton B. McCullough, Esq.  
Ross A. Appel, Esp.  
McCullough Khan, LLC  
359 King Street, Suite 200  
Charleston, SC 29401  
**Attorneys for Plaintiff William E. Danielson**

Tyler Beauregard  
816 Acoma Street, Apt. 203  
Denver, CO 80204  
**Pro Se Defendant**

[Signature of counsel on following page]

Respectfully submitted,

**POPE FLYNN, LLC**



---

R. Patrick Flynn, Esquire  
Michael W. Allen, Jr., Esquire  
P.O. Box 70  
Charleston, SC 29402  
[pflynn@popeflynn.com](mailto:pflynn@popeflynn.com)  
[mallen@popeflynn.com](mailto:mallen@popeflynn.com)  
(843) 790-9570

*Attorneys for Appellant Born Capital, LLC*

February 17, 2020



**POPE FLYNN**  
GROUP

**R. PATRICK FLYNN**  
*Attorney*  
pflynn@popeflynn.com  
OFFICE 843.790.9570

**Pope Flynn, LLC**  
P.O. Box 70  
Charleston, SC 29402  
www.popeflynn.com

February 17, 2020

**VIA FEDERAL EXPRESS**

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

**RECEIVED**  
FEB 20 2020  
SC Court of Appeals

RE: William Danielson v. Tyler Beauregard, Caroline Beauregard, and Born Capital, LLC  
Case No: 2016-CP-10-04211 (Charleston County, South Carolina)

Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of the Notice of Appeal in the above-referenced case, proof of service as to the Notice of Appeal, as well as a copy of the Order challenged on appeal. Also enclosed is this firm's check in the amount of \$250.00 for the filing fee. I would appreciate your filing the originals and returning the file-stamped copies to me in the enclosed self-addressed, stamped envelope.

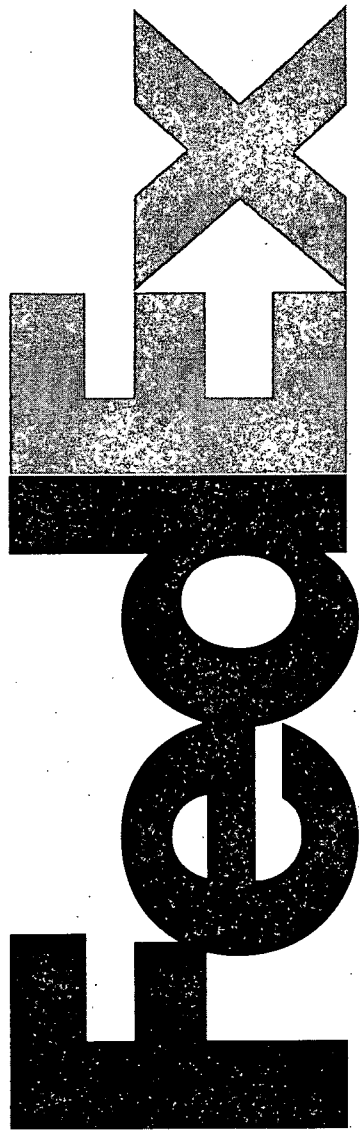
By copy of this letter, I am serving the same upon all counsel of record and the Charleston County Clerk of Court. I appreciate your assistance in this matter. If you have any questions or require any additional information, please do not hesitate to contact me. With best regards, I remain

Sincerely,

R. Patrick Flynn

Enclosures

cc: Julia P. Copeland, Esquire  
Clayton B. McCullough, Esquire  
Ross A. Appel, Esquire  
Tyler Beauregard, Pro Se Defendant  
The Honorable Julie J. Armstrong, Charleston County Clerk of Court



Express

16:30  
103  
104

ORIGIN ID: RBWA (843) 790-9570  
EMILY SALLEE  
170 MEETING STREET  
SUITE 510  
CHARLESTON, SC 29401  
UNITED STATES US

SHIP DATE: 17FEB20  
ACTWGT: 1.00 LB  
CAD: 111157884/INET4220

BILL SENDER

TO THE HONORABLE JENNY ABBOTT KITCHING  
CLERK OF COURT FOR THE SC CT OF APP  
1220 SENATE STREET

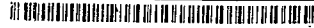
COLUMBIA SC 29201

(503) 734-1890

REF: BORN - 2026 170006

PC

DEFT:



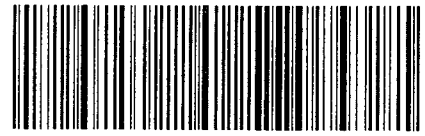
FedEx

TRK# 7777 8810 9567

FRI - 21 FEB AA  
EXPRESS SAVER

29201  
SC-US  
CAE

SH USCA



F10 5201131 18FEB20 CHSA 56AC2/049E/05A2

RECEIVED

FEB 20 2020

SC Court of Appeals

55EL02048FE64

- P R

1