

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Apr 09 2020**

APPEAL FROM RICHLAND COUNTY  
Jocelyn Newman, Circuit Court Judge

**SC Court of Appeals**

Case No. 2017-CP-40-3166

Bridgett Taylor,..... Respondent,

v.

Richland County Sheriff's Department, ..... Appellant.

**NOTICE OF APPEAL**

The Appellant Richland County Sheriff's Department hereby appeals the following Orders issued by the Honorable Jocelyn Newman:

- (1) Form Order Granting Plaintiff's Motion to Reconsider, filed February 3, 2020,
- (2) Order Denying Defendants' Motion to Alter or Amend Order, filed March 10, 2020.

In addition, to the extent the Court affirms the ruling that the Honorable Jocelyn Newman was bound in her decisions by the Orders issued by the

Honorable L. Casey Manning, the Appellant Richland County Sheriff's Department also appeals the following Orders:

- (1) Order Denying Defendant's Motion for Summary Judgment filed January 29, 2019,
- (2) Order Denying Defendants' Motion to Reconsider, filed February 27, 2019.

The Appellant's counsel received written notice of entry of the Order Denying Defendants' Motion to Alter or Amend Order on March 10, 2020.

LINDEMANN, DAVIS & HUGHES, P.A.



BY: s/ Andrew F. Lindemann

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Richland County Sheriff's Department*

April 8, 2020

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*Counsel for Respondent*  
*Bridgett Taylor*

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**SC Court of Appeals**

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondent Richland County Sheriff's Department, does hereby certify that service of the **Notice of Appeal** was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 8th day of April 2020:

Andrew W. Kunz, Esquire  
Lauren K. Slocum, Esquire  
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Georgetown, South Carolina 29442

Robert David Garfield  
Crowe LaFave, LLC  
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SC Court of Appeals

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April 8, 2020

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*Of Counsel*

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Via Facsimile 803-734-1839 and U.S. Mail

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Bridgett Taylor v. Richland County Sheriff's Department  
Civil Action Number: 2017-CP-40-3166  
Claim Number: Risk Management  
Our File Number: 314.20297

Dear Ms. Kitchings:

Please find enclosed and served upon you the **Notice of Appeal** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. I have also enclosed my firm's \$250.00 check for the filing fee. By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
April 8, 2020  
Page Two

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cc: (w/ Enclosure)

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**FAX COVER SHEET**

TO	The Honorable Jenny Abbott Kitchings
COMPANY	South Carolina Court of Appeals
FAX NUMBER	18037341839
FROM	Jennifer Baker
DATE	2020-04-08 20:51:27 GMT
RE	Taylor v RCSD Notice of Appeal

**COVER MESSAGE**

Please see attached. The letter references the filing fee as an enclosure; however, it will be mailed in a separate envelope from the actual Notice of Appeal due to us working remotely from our homes. Thank you.

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