

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Jocelyn Newman, Circuit Court Judge

Case No. 2017-CP-40-3166

RECEIVED
APR 13 2020
SC Court of Appeals

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

ANDREW F. LINDEMANN #13030
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920
Email: andrew@ldh-law.com

-and-

ROBERT D. GARFIELD #6557
CROWE LAFAVE, LLC
500 Taylor Street, Suite 202
Post Office Box 1149
Columbia, South Carolina 29202
(803) 724-5729
Email: robert@crowelafave.com

*Counsel for Appellant
Richland County Sheriff's Department*

April 8, 2020

Other Counsel of Record:

Andrew W. Kunz, SC Bar #78261
Lauren K. Slocum, SC Bar # 101280
Elliott, Phelan & Kunz, LLC
Post Office Box 1405
Georgetown, South Carolina 29442
(843) 546-0650
Email: andrew@elliottphelanlaw.com
Email: lauren@elliottphelanlaw.com

Counsel for Respondent
Bridgett Taylor

CERTIFICATE OF SERVICE

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
Elliott, Phelan & Kunz, LLC
Post Office Box 1405
Georgetown, South Carolina 29442

Robert David Garfield
Crowe LaFave, LLC
Post Office Box 1149
Columbia, South Carolina 29202



RECEIVED
APR 13 2020
SC Court of Appeals



Telephone (803) 881-8920
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)
Post Office Box 6923
Columbia, South Carolina 29260

April 8, 2020

ANDREW F. LINDEMANN*
Direct Dial: (803) 881-8921
Email: andrew@ldh-law.com

JAMES M. DAVIS, JR.†
Direct Dial: (803) 881-8922
Email: jim@ldh-law.com

JOEL S. HUGHES†
Direct Dial: (803) 881-8923
Email: joel@ldh-law.com

**Also Admitted in North Carolina
†Certified Mediator*

Of Counsel

STEVEN R. SPREEUWERS
Direct Dial: (803) 373-2268
Email: steve@ldh-law.com

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

RECEIVED
APR 13 2020
SC Court of Appeals

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

cc: (w/ Enclosure)

Andrew W. Kunz, Esquire
Lauren K. Slocum, Esquire
Elliott, Phelan & Kunz, LLC
Post Office Box 1405
Georgetown, South Carolina 29442

Robert David Garfield
Crowe LaFave, LLC
Post Office Box 1149
Columbia, South Carolina 29202



Lindemann, Davis & Hughes, P.A.
Post Office Box 6923
Columbia, South Carolina 29260

RECEIVED
APR 13 2020
SC Court of Appeals

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

