

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF BERKELEY )  
 )  
DORETTA MCHUGH, AS P.R. OF )  
THE ESTATE OF DANIEL E. COY, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
JOHN DOE, )  
 )  
Defendant. )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO.: 2017-CP-08-02153

**NOTICE OF INTENT TO APPEAL**



Plaintiff, by and through undersigned counsel, files this notice of intent to appeal the decision of the Court of Common Pleas rendered on April 29, 2020 denying Plaintiff's Motion for Reconsideration, denying Plaintiff's request to read Plaintiff's Voir Dire at jury selection, denying Plaintiff's Motion for Judgment Notwithstanding the Verdict, denying Plaintiff's Motion for Directed Verdict, Denying Plaintiff's Motion to Reconsider, in admitting evidence, over Plaintiff's objections, of Plaintiff's prior conduct to prove comparative negligence, and in such particulars as will be further discussed in Plaintiff's Initial Brief.

WHEREFORE, Plaintiff believes the relief requested herein is necessary for the preservation of justice, protection of her due process rights, and preservation of her right to appeal.

*[Signature page to follow]*

Respectfully submitted,

BOLES LAW FIRM, LLC

s:/Daniel C. Boles

Daniel C. Boles

SC Bar # 79135

Attorney for Plaintiff

23 Broad Street

3870 Leeds Avenue, Suite 104

Post Office Box 381

Charleston, SC 29402

843.576.5775 *office*

800.878.5443 *fax*

May 6, 2020  
Charleston, SC

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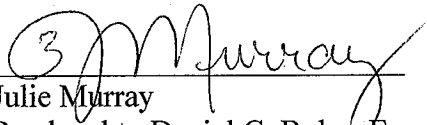
**PROOF OF SERVICE**

**RECEIVED**

**May 07 2020**

**SC Court of Appeals**

I certify that I have served this Notice of Intent to Appeal on Michael T. Coulter, Esq., counsel for Progressive Direct Insurance Company, by depositing a copy of it in the United States Mail, postage prepaid, on May 7, 2020.

  
Julie Murray  
Paralegal to Daniel C. Boles, Esq.

Other Counsel of Record:  
Daniel C. Boles, SC Bar #: 79135  
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May 7, 2020  
Charleston, SC

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May 7, 2020

**RECEIVED**

**May 07 2020**

**SC Court of Appeals**

**VIA U.S. MAIL & EMAIL**

Michael T. Coulter, Esq.  
Clarkson, Walsh & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
mcoulter@clarksonwalsh.com

*Re: Doretta McHugh, as Personal Representative of the Estate of Daniel E.  
Coy v. John Doe; Case No.: 2017-CP-08-02153*

Dear Mr. Coulter:

Enclosed for service upon you, please find the *Notice of Intent to Appeal* in the above-referenced matter.

Please call our office if you have any questions or concerns. Thank you for your time.

Sincerely,

Julie Murray  
Paralegal to Daniel C. Boles, Esq.  
BOLES LAW FIRM, LLC

Enclosures: Stated  
cc: Doretta McHugh (via email)