

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
**Aug 18 2020**  
**SC Court of Appeals**

---

APPEAL FROM BARNWELL COUNTY  
Doyet A. Early, Circuit Court Judge  
Clifton B. Newman, Circuit Court Judge

---

Lower Court Case No. 2013-CP-06-0059  
Appellate Case No. 2019-000599

---

Lorenda Robinson, Elaine Nix, Archie Patterson,  
and Tami Bollerman, ..... Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and Workforce,  
..... Appellant/Respondent.

---

**AMENDED NOTICE OF APPEAL**

---

The South Carolina Department of Employment and Workforce appeals the following Orders of the Honorable Doyet A. Early and the Honorable Clifton B. Newman:

1. Order of the Honorable Doyet A. Early dated April 29, 2016 and filed May 5, 2016, certifying class.

2. Order of the Honorable Doyet A. Early dated April 12, 2017 and filed April 27, 2017, denying reconsideration of the Order of Judge Early dated April 29, 2016, and holding that Plaintiffs Bollerman and Patterson have standing to represent the putative class.

3. Order of the Honorable Doyet A. Early dated October 27, 2017, which (a) denied reconsideration of the Order of Judge Early dated April 12, 2017, and (b) further denied reconsideration of the Order of Judge Early dated April 29, 2016.

4. Order of the Honorable Doyet A. Early dated and e-filed February 15, 2019, and attached Notice to Class Members, ruling in favor of Plaintiffs on the merits, and making additional rulings.

5. Order of the Honorable Doyet A. Early dated and e-filed March 11, 2019, denying both parties' motions to alter or amend, except on the issues raised by Plaintiffs' motion regarding the notice to the class, the class definition, and the claims made process established in the February 15, 2019, order, those latter issues being taken under advisement.

6. Order of the Honorable Doyet A. Early dated and e-filed March 21, 2019, and attached Notice to Class Members, granting Plaintiffs' Rule 59(e) motion regarding the claims made procedure and class definition. Appellant received written notice of that Order when it was e-filed on March 21, 2019, and

originally filed and served a Notice of Appeal of that and all Orders referenced above on April 8, 2019.

7. The South Carolina Department of Employment and Workforce (now Appellant/Respondent) also appeals the Order of the Honorable Clifton B. Newman dated July 20, 2020 and e-filed July 22, 2020, denying reconsideration of the Order of Judge Doyet A. Early dated March 21, 2019. Appellant/Respondent received written notice of the entry of Judge Newman's Order when it was e-filed on July 22, 2020.

DAVIDSON, WREN & DEMASTERS, P.A.



BY: s/Kenneth P. Woodington

WILLIAM H. DAVIDSON, II #1558  
KENNETH P. WOODINGTON #6213  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Appellant/Respondent, South  
Carolina Department of Employment and  
Workforce*

Columbia, South Carolina

August 18, 2020

**Other Counsel of Record:**

Daniel W. Williams, #10233  
Bedingfield & Williams, LLC  
Post Office Box 616  
Barnwell, South Carolina 29812  
(803) 259-2759

C. Bradley Hutto, #6436  
Williams & Williams  
Post Office Box 1084  
Orangeburg, South Carolina 29115  
(803) 380-4099

Alexander D. Pattera, #75004  
Pattera Law Firm, LLC  
104 South Calhoun Street  
Greenville, South Carolina 29601  
(864) 387-6872

Adam Protheroe  
Sue Berkowitz  
South Carolina Appleseed  
Legal Justice Center  
Post Office Box 7187  
Columbia, South Carolina 29202  
(803) 779-1113

*Counsel for Respondents/Appellants*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BARNWELL COUNTY  
Doyet A. Early, Circuit Court Judge  
Clifton B. Newman, Circuit Court Judge

---

**RECEIVED**  
**Aug 18 2020**  
**SC Court of Appeals**

Lower Court Case No. 2013-CP-06-0059  
Appellate Case No. 2019-000599

---

Lorenda Robinson, Elaine Nix, Archie Patterson,  
and Tami Bollerman, ..... Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and Workforce,  
..... Appellant/Respondent.

---

**CERTIFICATE OF SERVICE**

---

The undersigned employee of Davidson, Wren & DeMasters, P.A., counsel for the Appellant/Respondent, does hereby certify that service of the **Amended Notice of Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 18th day of August, 2020. Additional service was made by e-mail to the e-mail addresses shown below.

Daniel W. Williams, Esquire  
Bedingfield & Williams, LLC  
Post Office Box 616  
Barnwell, South Carolina 29812  
[dan@danwilliamslaw.com](mailto:dan@danwilliamslaw.com)

C. Bradley Hutto, Esquire  
Williams & Williams  
Post Office Box 1084  
Orangeburg, South Carolina 29115  
[cbhutto@williamsattys.com](mailto:cbhutto@williamsattys.com)

Alexander D. Pattera, Esquire  
Pattera Law Firm, LLC  
104 South Calhoun Street  
Greenville, South Carolina 29601  
[alex.pattera@patteralaw.com](mailto:alex.pattera@patteralaw.com)

Adam Protheroe, Esquire  
Susan B. Berkowitz, Esquire  
South Carolina Appleseed  
Legal Justice Center  
Post Office Box 7187  
Columbia, South Carolina 29202  
[adam@scjustice.org](mailto:adam@scjustice.org), [SBerk@scjustice.org](mailto:SBerk@scjustice.org)



---

Sherri H. Rodgers

DAVIDSON, WREN & DEMASTERS, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II  
Michael B. Wren  
David A. DeMasters

1611 Devonshire Drive, Second Floor (29204)  
Post Office Box 8568  
Columbia, South Carolina 29202-8568  
Telephone: (803) 806-8222  
Facsimile: (803) 806-8855

Brandon M. Briggs  
Jonathan M. Riddle  

---

Of Counsel  
Kenneth P. Woodington

August 18, 2020

Writer's Email: [kwoodington@dml-law.com](mailto:kwoodington@dml-law.com)

Via e-filing (Court of Appeals Filing) and U.S. Mail

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Archie Patterson v. SCDEW  
Appellate Case No. 2019-000599  
Our File Number: 79.9168

RECEIVED

Aug 18 2020

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of the **Amended Notice of Appeal** of the Department of Employment and Workforce in the above referenced matter, with proof of service and copies of all Orders referenced in this Amended Notice of Appeal. I have not enclosed the filing fee since the Department, a state agency, is exempt pursuant to Rule 203(d)(1)(B)(iii), SCACR.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

With highest regards, I am

Sincerely yours,

DAVIDSON, WREN & DEMASTERS, P.A.



s/Kenneth P. Woodington

Kenneth P. Woodington

KPW/  
Enclosures

The Honorable Jenny Abbott Kitchings

Page 2

August 18, 2020

---

cc: (via e-mail and U.S. Mail)(w/enclosures)

Daniel W. Williams, Esquire  
Bedingfield & Williams, LLC  
Post Office Box 616  
Barnwell, South Carolina 29812  
[dan@danwilliamsllaw.com](mailto:dan@danwilliamsllaw.com)

C. Bradley Hutto, Esquire  
Williams & Williams  
Post Office Box 1084  
Orangeburg, South Carolina 29115  
[cbhutto@williamsattys.com](mailto:cbhutto@williamsattys.com)

Alexander D. Pattera, Esquire  
Pattera Law Firm, LLC  
104 South Calhoun Street  
Greenville, South Carolina 29601  
[alex.pattera@patterallaw.com](mailto:alex.pattera@patterallaw.com)

Adam Protheroe, Esquire  
Susan B. Berkowitz, Esquire  
South Carolina Appleseed  
Legal Justice Center  
Post Office Box 7187  
Columbia, South Carolina 29202  
[adam@scjustice.org](mailto:adam@scjustice.org)  
[SBerk@scjustice.org](mailto:SBerk@scjustice.org)