

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Case No. 2017-CP-10-00838

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**RECEIVED**  
**Sep 04 2020**  
**SC Court of Appeals**

Jacque Lucas, Shirley Ann Lucas and  
Daniel Simerly,

Appellants,

v.

KapStone Paper and Packaging Corporation,  
KapStone Kraft Paper Corporation, Safway  
Group Holdings, LLC, Sypris Technologies,  
Inc. f/k/a Tube-Turns Technologies, Inc.,  
Thompson Construction Group, Inc. and  
Thompson Industrial Services, LLC,

Defendants,

Of Whom

KapStone Paper and Packaging Corporation  
and KapStone Kraft Paper Corporation, are

Respondents.

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**NOTICE OF APPEAL**

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Jacque Lucas, Shirley Ann Lucas and Daniel Simerly appeal the Order (Form 4) Denying Plaintiffs' Motion to Reconsider dated August 6, 2020, and entered and electronically served by the Clerk of Court for Charleston County on August 7, 2020 (the "59(e) Order"). Undersigned counsel received electronic notice of the entry of the 59(e) Order on August 7, 2020.

**CALLISON TIGHE & ROBINSON, LLC**

*s/ D. Reece Williams, III*

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Richard C. Detwiler (SC Bar No. 6473)

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*Attorneys for the Appellants*

September 4, 2020

Columbia, South Carolina

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**ATTORNEYS FOR KAPSTONE PAPER AND PACKING CORPORATION AND  
KAPSTONE KRAFT PAPER CORPORATION**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
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Group Holdings, LLC, Sypris Technologies,  
Inc. f/k/a Tube-Turns Technologies, Inc.,  
Thompson Construction Group, Inc. and  
Thompson Industrial Services, LLC,

Defendants,

Of Whom

KapStone Paper and Packaging Corporation  
and KapStone Kraft Paper Corporation, are

Respondents.

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**PROOF OF SERVICE**

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I hereby certify that, on this date, the **NOTICE OF APPEAL** was served on Respondents' counsel via email, pursuant to Supreme Court Order dated March 20, 2020, as amended on May 29, 2020, and by first class U.S. mail as follows:

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A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

*s/ D. Reece Williams, III*  
\_\_\_\_\_  
D. Reece Williams, III

September 4, 2020  
Columbia, South Carolina

## Katie Minton

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**From:** Katie Minton  
**Sent:** Friday, September 4, 2020 4:08 PM  
**To:** Richard Willis; 'Derek Tarver'; 'Ducayet, Jim'  
**Cc:** Kurt Arnold; Kyle Findley; Adam Lewis; Kala Sellers; Kason Kimberley; Kristina McDonald; Jill Erickson; KBA Team; 'Sara Rothell'; 'Kim Rothrock'; 'Duke R. Highfield, Esq.'; Wiseman, Jeffrey; 'Brandt R. Horton, Esq.'; 'Anderson, Victoria (Tori)'; 'Brennan, Sally'; Cattles, Martina (Marti); 'kstair@carlockcopeland.com'; Norris, Patrick J.; Yates, Melissa M.; Lemons, Alexandra M.; 'mpeeler@carlockcopeland.com'; Shaw, Katie D.; Canaday, Jenifer L.; Sonaly Hendricks; 'Carl Pierce'; Carson Parker; daniellynch@piercesloan.com; sherrymanning@phswlaw.com; lindsaygrady@phswlaw.com; 'jtiller@hsblawfirm.com'; 'Amy Bower, Esq.'; Caplan, Robert; 'gelnettb@whiteandwilliams.com'; Reece Williams; Rick Detwiler; Ian T. Duggan  
**Subject:** Notice of Appeal | Jacque Lucas, Shirley Ann Lucas and Daniel Simerly vs. KapStone Paper and Packaging Corporation, et al. | Case No: 2017-CP-10-00838  
**Attachments:** 2020-09-04 Ltr to Clerk - Court of Appeals.pdf; 2020-09-04 Notice of Appeal (with Order) and Proof of Service.pdf

Dear Counsel:

Attached please find Plaintiffs' Notice of Appeal and Proof of Service with our correspondence to the appellate clerk regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing. Thank you.

With kind regards,

CALLISON  TIGHE

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**Litigation Paralegal**  
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**RECEIVED**  
**Sep 04 2020**  
SC Court of Appeals

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September 4, 2020

**RECEIVED**  
**Sep 04 2020**  
**SC Court of Appeals**

**VIA EMAIL: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

**Re: Jacque Lucas, Shirley Ann Lucas and Daniel Simerly  
vs. KapStone Paper and Packaging Corporation and  
KapStone Kraft Paper Corporation, et al.  
Charleston County Case No: 2017-CP-10-00838  
Our File No. 6716.001**

Dear Ms. Kitchings:

Enclosed herewith please find the Notice of Appeal, Proof of Service of the Notice of Appeal on the Respondents/Defendants, and a copy of the Order to be challenged on appeal, in regard to the above-referenced matter. Kindly file the same and return the clocked-in copies to the undersigned via return email. My firm's check in the amount of \$250.00 as the filing fee is being mailed to your office under separate cover as instructed.

The enclosed documents have been served upon Respondents' counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

**CALLISON TIGHE & ROBINSON, LLC**

[s/ D. Reece Williams](#)

D. Reece Williams

DRW:kam  
Enclosures

The Honorable Jenny Abbott Kitchings  
September 4, 2020  
Page 2

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cc: (w/ encl.)

The Honorable Jennifer B. McCoy (via email and first class mail)  
The Honorable Julie J. Armstrong, Charleston County Clerk of Court (via first class mail)

VIA EMAIL AND FIRST CLASS MAIL

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