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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 14 2020
SC Court of Appeals

APPEAL FROM BERKELEY COUNTY
In the Court of Common Pleas for the Ninth Circuit

Roger M. Young, Sr., Circuit Court Judge

Case No. 2019-CP-08-02334

Susan Brooks Knott Floyd.....Respondent

v.

Elizabeth Pope Knott Dross.....Appellant

NOTICE OF APPEAL


Defendant/Appellant Elizabeth Pope Knott Dross appeals the following orders:

- (a) ORDER GRANTING PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT entered on September 11, 2020 (attached hereto as Exhibit A).
- (b) ORDER DENYING MOTION TO ALTER OR AMEND JUDGMENT entered on October 2, 2020 (attached hereto as Exhibit B).

Defendant/Appellant received written notice of entry of the most recent order appealed from on October 2, 2020.

October 9, 2020

BARNWELL WHALEY
PATTERSON & HELMS, LLC

By: 
Jeffrey M. Bogdan, Esq
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Attorneys for Defendant/Appellant

Other Counsel of Record:

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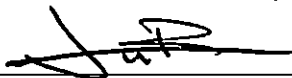
v.

Elizabeth Pope Knott Dross.....Appellant

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Susan Brooks Knott Floyd, by depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorneys of record, Charles P. Summerall, IV and G. Trenholm Walker, at their office mailing address at Post Office Box 2216, Charleston, SC 29413, on October 9, 2020.

BARNWELL WHALEY
PATTERSON & HELMS, LLC

By: 

Jeffrey M. Bogdan, Esq.
288 Meeting Street, Ste 200
Charleston, SC 29401
(843) 577-7700

Attorney for Defendant/Appellant

Julia Childers

From: Julia Childers
Sent: Friday, October 9, 2020 3:41 PM
To: ctappfilings@sccourts.org
Cc: summerall@wgfilaw.com; Trenholm Walker; Josh Whitley; Jeff Bogdan
Subject: Notice of Appeal - Susan Brooks Knott Floyd v. Elizabeth Pope Knott Dross; C/A 2019-CP-08-02334
Attachments: Notice of Appeal (10.9.20) (01036978xA18B7).PDF; Floyd v Dross - Proof of Service of NOA 10.9.20.pdf

As provided in the South Carolina Supreme Court's Order Re: Operation of Appellate Courts During the Coronavirus Emergency (as Amended May 29, 2020), attached hereto for filing please find Defendant/Appellant Elizabeth Pope Knott Dross's Notice of Appeal and Proof of Service of the same. A check for \$250.00 for the filing fee is being sent to the Court via first class mail. A hard copy is also being mailed to all counsel of record.

Please let me know if there are any issues opening the attachments. Thank you for your assistance in this regard.

Sincerely,

JULIA CHILDERS, Legal Assistant to
David S. Cox, John W. Fletcher and Jeffrey M. Bogdan
BARNWELL WHALEY PATTERSON & HELMS, LLC
288 Meeting Street | Charleston SC 29401 | 843.577.7700 | 843.329.5328 (D)



WE ARE MOVING!

**As of November 2nd, our office location will be 211 King Street, Suite 300
Charleston, SC 29401**

CONFIDENTIAL

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REPLY TO SOUTH CAROLINA OFFICE

Jeffrey M. Bogdan, Esquire
jbogdan@barnwell-whaley.com

October 9, 2020

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

RE: Susan Brooks Knott Floyd vs. Elizabeth Pope Knott Dross
C/A No.: 2019-CP-08-02334
BWPH File No.: 2823.011

Dear Ms. Kitchings:

Please find enclosed the original Notice of Appeal and Proof of Service of the same, along with our firm's check for \$250.00 for the filing fee.

Thank you for your assistance.

Sincerely,

/Jeff Bogdan

John W. Fletcher

JWF/jgc
Enclosures

cc: Charles P. Summerall, Esq.
G. Trenholm Walker, Esq.
Joshua Steven Whitley, Esq.

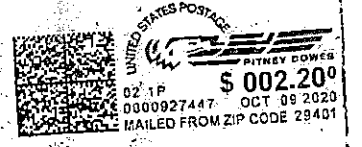
{01037019.DOCX.1 }

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE



BARNWELL | 80
WHALEY | YEARS ■
PATTERSON & HELMS LLC
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Clerk, South Carolina Court of Appeals
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