

**FORM 1
NOTICE OF APPEAL IN A CIVIL CASE**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-CP-23-01213

RECEIVED
Nov 19 2020
SC Court of Appeals

JAMES EARL TEGELER,

Appellant,

v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

NOTICE OF APPEAL

Appellant James Earl Tegeler appeals the orders of the Honorable Alex Kinlaw, Jr., dated November 9, 2020, and November 10, 2020. Respondents received written notice of entry of this order via electronically on November 19, 2020.

Respectfully submitted this 19 day of November, 2020.

DICKSON DAVIS LAW FIRM, LLC


Deborah D. Davis, Esq.

SC Bar No.: 102942

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ATTORNEY FOR APPELLANT

Other Counsel of Record:

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Duggan & Hughes, LLC
Daniel R. Hughes
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ATTORNEYS FOR THE RESPONDENTS

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FORM 9
LETTER TO CLERK OF LOWER COURT
FILING NOTICE OF APPEAL

November 19, 2020

The Honorable Paul B. Wickensimer
Clerk of Court for Greenville County
Court of Common Pleas
305 E. North St. # 318
Greenville, SC 29601

RECEIVED
Nov 19 2020
SC Court of Appeals

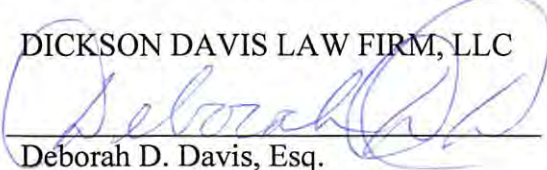
RE: James Earl Tegeler, Appellant, v. Charlotte Collier, Hannah Elizabeth Collier, Linda Smith, Northgate Baptist Church, Respondents, Case No. 2020-CP-23-01213

Dear Honorable Wickensimer:

Enclosed for filing is a notice of appeal in the above case.

Respectfully submitted this 19 day of November, 2020.

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**FORM 9
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FILING NOTICE OF APPEAL**

November 19, 2020

The Honorable Paul B. Wickensimer
Clerk of Court for Greenville County
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RE: James Earl Tegeler, Appellant, v. Charlotte Collier, Hannah Elizabeth Collier, Linda Smith, Northgate Baptist Church, Respondents, Case No. 2020-CP-23-01213

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ATTORNEYS FOR THE RESPONDENTS

**FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-CP-23-01213

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SC Court of Appeals

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Appellant,

v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Respondents **CHARLOTTE COLLIER, HANNAH ELIZABETH COLLIER, LINDA SMITH, NORTHGATE BAPTIST CHURCH** electronically and by depositing a copy of it in the United States Mail, postage prepaid, or by South Carolina Supreme Court Order 2020-05-29-02, on November 19, 2020, addressed to the attorney of record, to the following address(es):

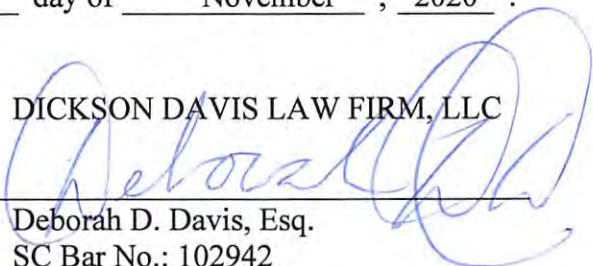
Northgate Baptist Church
c/o Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Charles E. McDonald & S. Michael Nail
300 North Main Street
P.O Box 2757
Greenville, SC 29602

Charlotte Collier
c/o Clawson and Staubes, LLC
Amy S. Snyder
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Suite 200
Greenville, SC 29601

Hannah Elizabeth Collier and Linda Smith
c/o Duggan & Hughes, LLC
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457-B Pennsylvania Avenue
P.O. Box 449
Greer, SC 29652

Respectfully submitted this 19 day of November, 2020.

DICKSON DAVIS LAW FIRM, LLC



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ATTORNEY FOR APPELLANT

**FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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v.

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Respondents.

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c/o Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
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ATTORNEY FOR APPELLANT



DICKSON DAVIS LAW FIRM

NOTICE OF APPEAL COVER LETTER

November 19, 2020

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

RECEIVED

Nov 19 2020

SC Court of Appeals

VIA E-FILE

Re : *Tegeler v. Collier et al.*
Case No. : 2020-CP-23-01213
File Id. : 2018-01-123

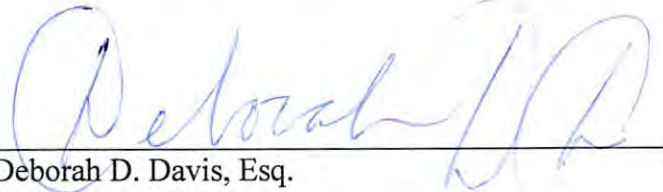
Dear Clerk of Court:

This letter is to inform you I represent Appellant James Earl Tegeler in this matter. Included is the payment of \$250.00 for an appeal regarding the court orders issued by the Honorable Alex Kinlaw, Jr., on November 9, 2020, November 9, 2020, and November 10, 2020. Included is the following:

- (1) Notice of Appeal;
- (2) Letter to Clerk of Lower Court in Greenville County Circuit Court;
- (3) Lower Court Orders;
 - (a) Decision by the Court granting Defendant Linda Smiths Motion to Dismiss 12(b)(6) and 12(c) on August 18, 2020;
 - (b) Decision by the Court granting Defendant Charlotte Collier's Motion to Dismiss 12(c) on August 18, 2020;
 - (c) Decision by the Court granting Defendant Northgate Baptist Church Motion to Dismiss 12(b)(6) on August 18, 2020;
 - (d) Corrected Decision by the Court granting Defendant Linda Smith and Hannah Elizabeth Collier's Motion for Judgment on the Pleadings and Motion to Dismiss 12(b)(6) and 12(c) on August 20, 2020;
 - (e) Order Granting Defendants' Hannah E. Collier and Linda Smith, Motion to Dismiss on September 8, 2020;
 - (f) Order Granting Defendant Northgate Baptist Church's Motion to Dismiss on September 8, 2020;
 - (g) Order Dismissing Charlotte Collier on September 8, 2020;
 - (h) Order Denying Plaintiff's Motion for Reconsideration to Alter or Amend a Judgment and Motion for Relief from Judgment prepared by Northgate Baptist Church on November 9, 2020;
 - (i) Order Denying Plaintiff's Motion to Reconsider the Dismiss of All Claims as to Charlotte Collier on November 9, 2020; and,
 - (j) Order Denying Plaintiff's Motion to Reconsider the Dismissal of All Claims as to Linda Smith and Hannah E. Collier on November 10, 2020;
- (4) Plaintiff's Motion to Motion to Reconsider and Motion for Relief on August 28, 2020;

- (5) Plaintiff's Amended Motion to Reconsider and Motion for Relief on September 14, 2020;
- (6) Affidavits of James Earl Tegeler, Josie Allen, Anne Danciu, Caroline Jenkins, Sue Lutz, and Roy Sabeau;
- (7) Letter Ordering Transcript from Court Reporter Hollie M. Jenkins, and a copy of the transcript already procured;
- (8) Proof of Service of Notice of Appeal.

Respectfully submitted this 19 day of November , 2020 .



Deborah D. Davis, Esq.
SC Bar No.: 102942
Attorney for Appellant

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Greenville County Clerk of Court

/ddd