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**NOV 18 2020**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
COURT OF COMMON PLEAS

Alex Kinlaw, Jr., Circuit Court Judge

Lower Court Case No. 2019-CP-23-03396

Nicholas Puleo, Attorney-in-Fact for Toni Puleo Sperry and John William Puleo...Appellant

Stephen Owen Jacobs.....Respondent

**NOTICE OF APPEAL**

On October 16, 2020, Circuit Court Judge Alex Kinlaw, Jr. issued an order in this case after Appellant’s filing of a Motion to Reconsider a previous Order Granting Motion for Order of Protection of Discovery dated July 13, 2020. The Court’s Order which is the subject of this Appeal is attached hereto as Exhibit A.

The Plaintiff/Appellant, Nicholas Puleo, Attorney-in-Fact for Toni Puleo Sperry and John William Puleo, hereby appeals the Circuit Court’s Order of October 16, 2020 (See Exhibit A).

s/ Joseph M. Plaxco  
Joseph M. Plaxco (SC Bar No. 100975)  
408 North Church Street; Suite B  
Greenville, South Carolina 29601  
(864) 240-9112  
Joseph.Plaxco@PlaxcoLaw.com  
*Attorney for the Appellant*

Other Council or Record:  
Chace D. Campbell (SC Bar No.:13624)  
ChaceLaw Limited Company  
12 East Stone Avenue  
Greenville, South Carolina 29609  
(864) 268-8244  
chace@chacelaw.com  
*Attorney for the Respondent*

Dated November 15, 2020  
Greenville, South Carolina

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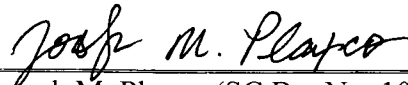
Nicholas Puleo, Attorney-in-Fact for Toni Puleo Sperry and John William Puleo...Appellant

Stephen Owen Jacobs.....Respondent

**NOTICE OF APPEAL**

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*Attorney for the Appellant*

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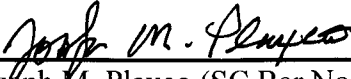
Nicholas Puleo, Attorney-in-Fact for Toni Puleo Sperry and John William Puleo...Appellant

Stephen Owen Jacobs.....Respondent

**AMENDED<sup>1</sup> CERTIFICATE / PROOF OF SERVICE**

I hereby certify that on the 13th day of November, 2020, I served a copy of the Notice of Appeal on the Respondent, Stephen Owen Jacobs, by mailing it to his attorney of record, Mr. Chace Campbell, Esquire, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows:

Chace D. Campbell  
ChaceLaw Limited Company  
12 East Stone Avenue  
Greenville, South Carolina 29609

  
\_\_\_\_\_  
Joseph M. Plaxco (SC Bar No. 100975)  
408 North Church Street; Suite B  
Greenville, South Carolina 29601  
(864) 240-9112  
Joseph.Plaxco@PlaxcoLaw.com  
*Attorney for the Appellant*

November 15, 2020  
Greenville, South Carolina

<sup>1</sup> The initial Certificate of Service filed on November 13, 2020 erroneously indicated service by hand delivery, when in fact, it was mailed to Mr. Campbell with proper postage affixed.

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Stephen Owen Jacobs.....Respondent

**AMENDED<sup>1</sup> CERTIFICATE / PROOF OF SERVICE**

I hereby certify that on the 13th day of November, 2020, I served a copy of the Notice of Appeal on the Respondent, Stephen Owen Jacobs, by mailing it to his attorney of record, Mr. Chace Campbell, Esquire, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows:

Chace D. Campbell  
ChaceLaw Limited Company  
12 East Stone Avenue  
Greenville, South Carolina 29609

s/ Joseph M. Plaxco  
Joseph M. Plaxco (SC Bar No. 100975)  
408 North Church Street; Suite B  
Greenville, South Carolina 29601  
(864) 240-9112  
Joseph.Plaxco@PlaxcoLaw.com  
*Attorney for the Appellant*

November 15, 2020  
Greenville, South Carolina

<sup>1</sup> The initial Certificate of Service filed on November 13, 2020 erroneously indicated service by hand delivery, when in fact, it was mailed to Mr. Campbell with proper postage affixed.

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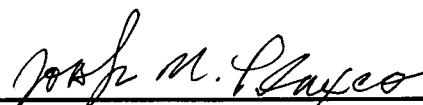
Nicholas Puleo, Attorney-in-Fact for Toni Puleo Sperry and John William Puleo...Appellant

Stephen Owen Jacobs.....Respondent

**CERTIFICATE / PROOF OF SERVICE**

I hereby certify that on the 15th day of November, 2020, I served a copy of the Notice of Appeal (e-signed and original signature) on the Respondent, Stephen Owen Jacobs, as well the Amended Certificate / Proof of Service, by mailing it to his attorney of record, Mr. Chace Campbell, Esquire, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows:

Chace D. Campbell  
ChaceLaw Limited Company  
12 East Stone Avenue  
Greenville, South Carolina 29609



Joseph M. Plaxco (SC Bar No. 100975)  
408 North Church Street; Suite B  
Greenville, South Carolina 29601  
(864) 240-9112  
Joseph.Plaxco@PlaxcoLaw.com  
*Attorney for the Appellant*

November 15, 2020  
Greenville, South Carolina

JOSEPH M. PLAXCO, LLC  
ATTORNEY AT LAW

408 NORTH CHURCH STREET; SUITE B  
GREENVILLE, SOUTH CAROLINA 29601

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SC Court of Appeals

TELEPHONE: (864) 240-9112  
TELEFAX: (864) 233-3750  
JOSEPH.PLAXCO@PLAXCOLAW.COM

November 15, 2020

The Honorable Jenny Abbot Kitchings  
The South Carolina Court of Appeals  
P.O. Box 11620  
Columbia, S.C. 29211

**Re: *Nicholas Puleo, as Attorney in Fact for Toni Sperry, and as Attorney in Fact for John William Puleo v. Stephen Owen Jacobs, Individually and as P.R. of the Estate of Terry Lyn Puleo***  
**C/A No.: 2019-CP-23-03396**

Dear Ms. Kitchings,

I was reviewing my file and certain documents I sent to the Court of Appeals on Friday, and notice a few minor errors. Therefore, I am sending you amended documents to reflect the minor errors made.

I also realized that I e-signed the Notice of Appeal and Proof of Service. Because I am not sure if the Court of Appeals is accepting e-signatures, I have enclosed the same documents with my original signature.

It would be greatly appreciated if you would return the clocked copies back to me in the enclosed return envelope.

Mr. Campbell, attorney for the Respondent is copied on this letter as well. All other documents (lower court order, filing fee check, etc.) and enclosures mailed on Friday should have no defects.

Finally, I have enclosed a Certificate / Proof of Delivery with regard to this packet being mailed to Mr. Campbell. I apologize for any confusion. Please feel free to call or email me with any questions or concerns.

Sincerely,



Joseph M. Plaxco

cc: Mr. Chace Campbell (via mail)

JOSEPH M. PLAXCO, LLC  
ATTORNEY AT LAW  
408 North Church Street, Suite B  
Greenville, South Carolina 29601

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