

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable R. Keith Kelly, Circuit Court Judge

Case No. 2019-CP-42-02212

RECEIVED
Dec 29 2020
SC Court of Appeals

Mark Douglas Hill, III, by and through his
Duly Appointed Guardian ad Litem, Helen
Kaci Hill, Plaintiff Respondent,

v.

Cranston Print Works Company D/B/A
Cranston Trucking Company, Ryder Tuck
Rental, Inc., Optimum Staffing, Inc., D/B/A
Optimum Logistic Solutions, and Jason E.
Burdette, Defendants,

And

Gregory Jones, Sr., as the Father and Duly
Appointed Personal Representative of the
Estate of Jessica Dawn Jones, Deceased, Plaintiff, Respondent,

v.

Cranston Print Works Company D/B/A
Cranston Trucking Company, Ryder Tuck
Rental, Inc., Optimum Staffing, Inc., D/B/A
Optimum Logistic Solutions, and Jason E.
Burdette, Defendants,

Of Whom Jason E. Burdette is the Appellant.

NOTICE OF APPEAL

Jason E. Burdette hereby appeals the Order of the Honorable R. Keith Kelly, filed October 8, 2020, and the Order of the Honorable R. Keith Kelly denying Defendants' Motion to Alter or Amend, filed December 18, 2020. Appellant received written notice of entry of the Order denying Defendants' Motion to Alter or Amend on December 18, 2020.

MCANGUS GOUDELOCK & COURIE, LLC

December 28, 2020

By: 

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Attorneys for Appellant Jason E. Burdette

Other Counsel of Record:

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*Counsel for Defendants Cranston Print Works Company d/b/a Cranston Trucking Company, and
Optimum Staffing, Inc.*

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Counsel for Defendant Ryder Truck Rental, Inc.



Reply To

GEOFFREY W. GIBBON
Direct Dial: (864) 239-2088
ggibbon@mgclaw.com

December 28, 2020

RECEIVED

Dec 29 2020

SC Court of Appeals

The Honorable Dorothy Earle
Spartanburg County Clerk of Court
366 N Church St
Spartanburg, SC 29303-3637

RE: Gregory Jones, Sr., as the father and duly appointed Personal Representative of the Estate of Jessica Dawn Jones v. Cranston Print Works Company d/b/a Cranston Trucking Company, Ryder Truck Rental, Inc., Optimum Staffing, Inc. d/b/a Optimum Logistic Solutions, and Jason E. Burdette
Civil Action No.: 2019-CP-42-02215 (Spartanburg)
Date of Incident: February 1, 2019
Carrier Claim No.: 501-831720
MGC File No.: 2094.20153

Dear Ms. Earle:

Please find enclosed for filing the original and one (1) copy of Notice of Appeal in the above-captioned case.

By copy of this letter, I am serving counsel of record with the above-referenced Notice of Appeal.

Thanking you in advance for your assistance, I am

Very truly yours,

Geoffrey W. Gibbon

Enclosures

cc: The Honorable Jenny Abbott Kitchings, S.C. Court of Appeals
Alexander P. Lewis, Esq.
W. Blake Cummings, Esq.
Patrick E. Knie, Esq.
Brandt Horton, Esq.

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And

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Cranston Trucking Company, Ryder Tuck
Rental, Inc., Optimum Staffing, Inc., D/B/A
Optimum Logistic Solutions, and Jason E.
Burdette, Defendants,

Of Whom Jason E. Burdette is the Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Mark Douglas Hill, III, by and through his Duly Appointed Guardian ad Litem, Helen Kaci Hill, and Gregory Jones, Sr., as the Father and Duly Appointed Personal Representative of the Estate of Jessica Dawn Jones, and other counsel of record by emailing and depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

Alexander P. Lewis, Esq.
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Counsel for Plaintiffs

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Counsel for Defendant Ryder Truck Rental

December 28, 2020

s/Lisa Carducci

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Legal Assistant to Helen F. Hiser
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Attorneys for Appellant Jason E. Burdette

**Reply To**

HELEN F. HISER
 Direct Dial: (843) 576-2930
 helen.hiser@mgclaw.com

December 28, 2020

RECEIVED**Dec 29 2020****SC Court of Appeals****VIA FACSIMILE AND U.S. MAIL**

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

RE: Gregory Jones, Sr., as the father and duly appointed Personal Representative of the Estate of Jessica Dawn Jones v. Cranston Print Works Company d/b/a Cranston Trucking Company, Ryder Truck Rental, Inc., Optimum Staffing, Inc. d/b/a Optimum Logistic Solutions, and Jason E. Burdette
 Civil Action No.: 2019-CP-42-02215 (Spartanburg)
 Date of Incident: February 1, 2019
 Carrier Claim No.: 501-831720
 MGC File No.: 2094.20153
 Appeal No.: 2020-

Dear Ms. Kitchings:

Enclosed for filing are the original and one copy of the Notice of Appeal in the above-referenced matter. Also, enclosed are the following:

1. an original and one copy of Proof of Service of the Notice of Appeal on Respondent;
2. one copy of the Orders being appealed;
3. two copies of our correspondence to the Spartanburg County Clerk of Court notifying of the appeal; and
4. a Check in the amount of \$250.00.

Please file the original documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope. Thanking you in advance for your assistance, I am

Yours truly,

Helen F. Hiser

cc: The Honorable Dorothy Earle, Spartanburg County Clerk of Court

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The Honorable Jenny Abbott Kitchings
December 28, 2020
Page 2

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