

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 Nos. 2019-CP-42-02212 & 2019-CP-42-02215

**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 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 Amy W. Cox  
Spartanburg County Clerk of Court  
180 Magnolia Street  
Spartanburg, SC 29302

RE: Mark Douglas Hill, III by and through his duly appointed Guardian ad Litem, Helen Kaci Hill 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 / 2019-CP-42-02212

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 / 2019-CP-42-02215

Date of Incident: February 1, 2019  
Carrier Claim No.: 501-831720  
MGC File No.: 2094.20153

Dear Ms. Cox:

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.

The Honorable Dorothy Earle  
December 28, 2020  
Page 2

Thanking you in advance for your assistance, I am

Very truly yours,

A handwritten signature in black ink, appearing to read "Gibbon", written over a light gray dotted grid background.

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.

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 Nos. 2019-CP-42-02212 & 2019-CP-42-02215



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.

**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 Defendant Ryder Truck Rental*

December 28, 2020

*s/Lisa Carducci*

---

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*Attorneys for Appellant Jason E. Burdette*

**Reply To**

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 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,

cc: The Honorable Amy W. Cox, Spartanburg County Clerk of Court

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