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**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY  
CIRCUIT COURT

R. Scott Sprouse, Circuit Court Judge

Case No. 2020-CP-04-01809


Moats Construction, Inc.....Appellant,

v.

City Council of the City of Anderson .....Respondent.

**NOTICE OF APPEAL**

Moats Construction, Inc. appeals the Order of the Honorable R. Scott Sprouse, Circuit Court Judge, dated February 12, 2021 denying Plaintiff's Appeal from the City Council of the City of Anderson. The Order dated February 12, 2021 is attached hereto.



T. Jeff Goodwyn, Jr., SC Bar No. 73789

C. David Beale, Jr., SC Bar No. 102917

Goodwyn Law Firm, LLC

2309 Devine Street

Columbia, SC 29205

(803) 251-4517

[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)

[dbeale@goodwynlaw.com](mailto:dbeale@goodwynlaw.com)

Attorneys for Appellant

Columbia, South Carolina  
March 15, 2021

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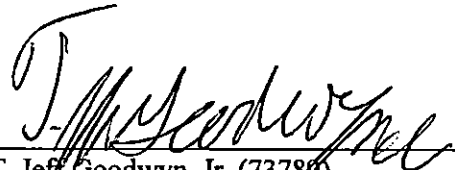
**PROOF OF SERVICE**

I certify that I have served the **Notice of Appeal** on J. Franklin McClain, Esquire, Counsel for the Respondent, at the address below by depositing a copy of same in the United States Mail, postage prepaid, on March 15, 2021.

J. Franklin McClain, Esquire  
Office of the City Attorney  
401 South Main Street  
Anderson, SC 29624

The Honorable R. Scott Sprouse  
P.O. Box 1277  
Walhalla, SC 29691

Anderson County Clerk of Court  
P.O. Box 8002  
Anderson, SC 29622

  
\_\_\_\_\_  
T. Jeff Goodwyn, Jr. (73789)  
C. David Beale, Jr. (102917)  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, SC 29205  
(803) 251-4517  
[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)  
[dbeale@goodwynlaw.com](mailto:dbeale@goodwynlaw.com)  
*Attorney for Appellant*

March 15, 2021

# GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.\*  
C. David Beale, Jr.\*

Reply to:  
2309 Devine Street  
Columbia, South Carolina 29205

111-B Congress Street  
Winnsboro, South Carolina 29180

Tel. (803) 251-4517 (Columbia)  
Fax (803) 251-4527

Tel. (803) 635-1920 (Winnsboro)  
Fax (803) 635-2100

Email: jgoodwyn@goodwynlaw.com  
dbeale@goodwynlaw.com  
Web: www.goodwynlaw.com

\*Also Licensed in Georgia

March 15, 2021

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

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SC Court of Appeals

RE: ***Moats Construction, Inc. v. City Council of the City of Anderson***  
*Civil Action No.: 2020-CP-04-01809*  
*Our File No.: 3000-0519*

Dear Ms. Kitchings:

Enclosed for filing, please find the original and two (2) copies of the Appellant's Notice of Appeal and Proof of Service in regard to the above referenced matter. Please have your office file the original and return the filed, stamped copies to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$250.00 representing the filing fees for same.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Notice of Appeal.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures

cc: Russell Moats  
Anderson County Clerk of Court  
The Honorable R. Scott Sprouse  
J. Franklin McClain, Esquire