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Jun 03 2021

SC Court of Appeals

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM CHESTER COUNTY

Court of Common Pleas

Brian M.. Gibbons, Circuit Court Judge

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Case No. 2019-CP-12-00321

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Ronald Gaines,

Appellant,

v.

Love and Charity Baptist Church,

Respondent,

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NOTICE OF APPEAL

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Ronald Gaines appeals Order Granting Respondent's Motion to Compel and striking answers of Defendant by the Honorable Brian M. Gibbons dated May 9, 2021. Appellant received written Notice of Entry of this Order sometime after May 3, 2021 via USPS mail delivery.

June 03, 2021

/s/ Neil T. Phillips

The Law Office of Neil T. Phillips, LLC

30 N. Congress Street, Suite 106

York, South Carolina 29745

Phone: 803 - 810 - 5423

Fax: 877 - 502 - 9001

Email: [neil@neilphillipslaw.com](mailto:neil@neilphillipslaw.com)

Attorney for Appellant

*Other Counsel of Record:*

D. Bradley Jordan

546 East Main Street

P.O. Box 11785

Rock Hill, South Carolina 29731

Attorney for Respondent

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Ronald Gaines,

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Respondent,

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Love and Charity Baptist Church by E-filing and emailing a copy of the document to their Attorney of Record, D. Bradley Jordan, on June 03, 2021, email address: [bradjordan@comporium.net](mailto:bradjordan@comporium.net).

June 03, 2021

/s/ Neil T. Phillips

The Law Office of Neil T. Phillips, LLC

30 N. Congress Street, Suite 106

York, South Carolina 29745

Phone: 803 - 810 - 5423

Fax: 877 - 502 - 9001

Email: [neil@neilphillipslaw.com](mailto:neil@neilphillipslaw.com)

Attorney for Appellant

*Other Counsel of Record:*

D. Bradley Jordan

546 East Main Street

P.O. Box 11785

Rock Hill, South Carolina 29731

Attorney for Respondent

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**SC Court of Appeals**

**LETTER TO CLERK OF LOWER COURT  
FILING NOTICE OF APPEAL**

June 03, 2021

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Ronald Gaines, Appellant v. Love and Charity Baptist Church, Respondent, Case No.:  
2019 CP 12 00321`

Dear Clerk of Court:

Enclosed for filing is a notice of appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondent
- (2) A copy of the orders and judgements which are to be challenged on appeal
- (3) A filing fee of \$250.00-(placed in USPS)

Sincerely,

s/Neil T. Phillips  
30 N Congress St  
Suite 106  
York, South Carolina  
(803) 810-5423  
Attorney for Appellant

cc: D. Bradley Jordan  
546 East Main St.  
PO Box 11785  
Rock Hill, SC 29731  
Attorney for Respondent

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**SC Court of Appeals**

**LETTER TO CLERK OF LOWER COURT  
FILING NOTICE OF APPEAL**

June 03, 2021

The Honorable Sue K. Carpenter  
Clerk of Court of Chester County  
Post Office Box 580  
Chester, South Carolina 29706

RE: Ronald Gaines, Appellant v. Love and Charity Baptist Church, Respondent, Case No.:  
2019 CP 12 00321`

Dear Clerk of Court:

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

Sincerely,

s/Neil T. Phillips  
30 N Congress St  
Suite 106  
York, South Carolina  
(803) 810-5423  
Attorney for Appellant

cc: D. Bradley Jordan  
546 East Main St.  
PO Box 11785  
Rock Hill, SC 29731  
Attorney for Respondent