

THE STATE OF SOUTH CAROLINA  
In the South Carolina Court of Appeals

**RECEIVED**

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

JUL 08 2021

**SC Court of Appeals**

J. Marvin H. Dukes, III, Master In Equity

Case No. 2017-CP-07-01921

Serena Green Grant.....Respondent,

v.

Palbert Inc., et al.....Appellants.

NOTICE OF APPEAL

Palbert Inc., et al., appeal the order of the Honorable Marvin H. Dukes, III, dated April 27, 2021, this order was filed April 27, 2021. Appellants also appeal the order of the Honorable Marvin H. Dukes, III, dated June 28, 2021, this order was filed on June 28, 2021.

July 7, 2021



Brandon P. Jones, Esq. (#78696)  
Alexander P. Zuraff, Esq. (#103824)  
The McKay Firm, PA  
3700 Forest Dr., Ste. 404 (29204)  
P.O. Box 7217  
Columbia, South Carolina 29202  
ATTORNEY FOR APPELLANTS

Other Counsel of Record:

James H. Moss, Esq.  
Moss, Kuhn & Fleming, P.A.  
P.O. Box 507  
Beaufort, South Carolina 29901  
ATTORNEY FOR RESPONDENT

**PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA  
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Honorable Marvin H. Dukes, III, Master In Equity

Case No. 2017-CP-07-01921

Serena Green Grant

Respondent,

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v.

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**PROOF OF SERVICE**

I certify that I have served the Notice of Appeal on Serena Green Grant by depositing a copy of it in the United States Mail, postage prepaid, on July 7, 2021, addressed to her attorney of record, James H. Moss, Post Office Box 507, Beaufort, South Carolina 29901-0501.

July 7, 2021

*s/Alexander P. Zuraff*

Brandon P. Jones

Alexander P. Zuraff

Post Office Box 7217

Columbia, South Carolina 29202

(803) 256-4546

Attorney for Appellants

**LETTER TO THE APPELLATE COURT CLERK  
FILING THE NOTICE OF APPEAL**

July 7, 2021

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

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**SC Court of Appeals**

RE: Serena Green Grant, Respondent, v. Palbert Inc,  
Appellant, Case No. 2000-CP-07-01921

Dear Ms. Kitchings:

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[s].
- (2) A copy of the orders which are to be challenged on appeal.
- (3) A filing fee of \$100.

Sincerely,  
s/Alexander P. Zuraff  
Brandon P. Jones  
Alexander P. Zuraff  
Post Office Box 7217  
Columbia, South Carolina 29202  
(803) 256-4546  
Attorney for Appellants

cc: James H. Moss  
Moss, Kuhn & Fleming, P.A.  
P.O. Box 507  
Beaufort, South Carolina 29901  
Attorney for Respondent