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Jan 28 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case No. 2019-CP-10-04053

Blind Acre, Inc., Respondent,

v.

Stash Storage Holdings, Inc., Appellant.

NOTICE OF APPEAL

BEN TRAYWICK LAW FIRM, LLC
Benjamin A.C. Traywick, SC Bar #74027
Alexandra Scott Williams, SC Bar #102862
171 Church Street, Ste 340
Charleston, SC 29401
T: 843-872-1709 | F: 843-695-7839
ben@bentraywicklaw.com
ali@bentraywicklaw.com

Attorneys for Appellant

Other Counsel of Record:

G. Rutledge DuRant (SC Bar #: 73944)
RIESEN DURANT LLC
613 Long Point Road, Suite 100
Mount Pleasant, South Carolina 29464
Phone: 843.800.0809 | Fax: 843.767.3282
Email: rutledge@riesendurant.com

Attorney for the Plaintiff

Defendant, Stash Storage Holdings, Inc. (“Appellant”), hereby appeals the following orders of the Honorable Mikell R. Scarborough, Master in Equity:

1. **Form 4 Order filed on June 15, 2021**, entering judgment against Appellant in the amount of \$1,937,589.15;
2. **Order finding that the Respondent suffered actual damages of \$937,589.15 as a result of the Defendant/Appellant's breach of contract**, filed June 15, 2021. To the extent the validity of this Order's subsequently reconsidered and vacated award of \$1,000,000 punitive damages is considered by this Court, the Defendant/Appellant also appeals the award of punitive damages;
3. **Order Granting Defendant’s Rule 59(e) Motion filed December 30, 2021**, to the extent it affirms the breach of contract award of \$937,589.15;
4. **Form 4 Order filed December 30, 2021**, to the extent it affirms the breach of contract award of \$937,589.15; and
5. **Form 4 Order filed December 30, 2021, entering a revised Statement of Judgment in the amount of \$937,589.15**, to the extent it affirms the breach of contract award of \$937,589.15.

Copies of the above-referenced appealed orders are attached hereto and incorporated herein by reference. Appellant received written notice of entry of the most recent order on December 30, 2021.

Respectfully submitted,

s/ Alexandra Scott Williams

Benjamin A.C. Traywick, SC Bar #74027
Alexandra Scott Williams, SC Bar #102862
BEN TRAYWICK LAW FIRM, LLC
171 Church Street, Ste 340, Charleston, SC 29401
T: 843-872-1709 | F: 843-695-7839
ben@bentraywicklaw.com
ali@bentraywicklaw.com

Attorneys for Appellant

January 28, 2022
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PROOF OF SERVICE

BEN TRAYWICK LAW FIRM, LLC
Benjamin A.C. Traywick, SC Bar #74027
Alexandra Scott Williams, SC Bar #102862
171 Church Street, Ste 340
Charleston, SC 29401
T: 843-872-1709 | F: 843-695-7839
ben@bentraywicklaw.com
ali@bentraywicklaw.com

Attorneys for Appellant

I hereby certify that the Appellant's **NOTICE OF APPEAL** was served on Respondent on **January 28, 2022** by emailing (see attached email) a copy of the same to Respondent's counsel of record as follows:

G. Rutledge DuRant (SC Bar #: 73944)
RIESEN DURANT LLC
613 Long Point Road, Suite 100, Mount Pleasant, South Carolina 29464
Phone: 843.800.0809 | Fax: 843.767.3282
Email: rutledge@riesendurant.com

Attorney for the Plaintiff

I also certify that a copy of this **NOTICE OF APPEAL** was this day, **January 28, 2022**, e-filed with the lower court (see attached NEF), thus also, i.e., in addition to service by email, effecting service of the notice today on Respondent's above-identified counsel of record via the E-Filing System.

Respectfully submitted,

BEN TRAYWICK LAW FIRM, LLC

By: s/ Alexandra Scott Williams

Benjamin A. C. Traywick (SC Bar No. 74027)

Alexandra Scott Williams (SC Bar No. 102862)

Attorneys for Appellant Stash Storage Holdings, Inc.

January 28, 2022

Charleston, South Carolina

Notice of Appeal - Blind Acre v Stash. 2019-CP-10-4053

Alexandra Williams <ali@bentraywicklaw.com>

Fri, Jan 28, 2022 at 12:35 PM

To: Rutledge DuRant <rutledge@riesendurant.com>

Cc: Benjamin Traywick <ben@bentraywicklaw.com>, Cappy Traywick <cappy@bentraywicklaw.com>, Teresa Cassaro <teresa@bentraywicklaw.com>

Attached please find Appellant's Notice of Appeal in the above-referenced matter, along with copies of the Appealed Orders referenced in the notice.

**Alexandra Scott Williams, Esquire**

Ben Traywick Law Firm, LLC

171 Church Street | Suite 340

Charleston, South Carolina 29401






P | 843.872.1709

F | 843.695.7839

www.bentraywicklaw.com

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6 attachments

-  **Notice of Appeal - Stash v Blind Acre.pdf**
115K
-  **21.06.15 MIE ORDER on Damages Hearing - \$1,937,589.15 GRANTED to BlindAcre (clocked).pdf**
280K
-  **21.06.15 Form 4 ORDER - Judgement in Favor of Blind Acre, Inc. (clocked).pdf**
400K
-  **21.12.30 MIE ORDER D's Mot to Amend Damages Award GRANTED (clocked).pdf**
1221K
-  **21.12.30.0855 Form 4 ORDER Statement of Judgment - \$937,589.15 (clocked).pdf**
1890K
-  **21.12.30.0853 Form 4 ORDER Stash's Motion to Amend Punitive Damages GRANTED, formal order to follow (clocked).pdf**
1732K



Courtesy NEF RE: 2019CP1004053

efiledonotreply@sccourts.org <efiledonotreply@sccourts.org>
To: ali@bentraywicklaw.com
Cc: teresa@bentraywicklaw.com

Fri, Jan 28, 2022 at 12:15 PM

******* IMPORTANT NOTICE - READ THIS INFORMATION *******
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2019CP1004053

Official File Stamp: 01-28-2022 12:15:15 PM
Court: CIRCUIT COURT
Common Pleas
Charleston
Case Caption: Blind Acre Inc VS Stash Storage Holdings Inc
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
Filed by or on behalf of: Alexandra Scott Williams

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Benjamin Alexander Crute Traywick for Stash Storage Holdings Inc
George Rutledge DuRant for Blind Acre Inc
Alexandra Scott Williams for Stash Storage Holdings Inc

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

[Quoted text hidden]