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MAR 15 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable Bentley D. Price, Circuit Court Judge

CASE NO.: 2017-CP-07-01739

Mark Shaffer, as Personal Representative of the
Estate of Susan Shaffer, Deceased,

Appellant

v.

DEH Disaster Recover, LLC, Ceres Environmental Services, Inc.;
Beaufort County, A Political Subdivision of the State of South
Carolina; Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson;
Brandi Dotson; Spencer A. Olson Trucking, LLC; Buyers Products, Co.;
and TruckPro, LLC,

Defendants

Of Whom Ceres Environmental Services, Inc. and Beaufort County, A Political
Subdivision of the State of South Carolina are

Respondents.

NOTICE OF APPEAL

The Appellant, Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased, hereby appeals the Order of Honorable Bentley D. Price entitled Order Granting the Joint Motion for Summary Judgment of Defendants Ceres Environmental Services, Inc. and Beaufort County dated February 11, 2022, copy of which is attached hereto as "Exhibit A." and the Order Denying Plaintiff's Motion to Reconsider dated March 1, 2022, a copy of which is attached hereto as "Exhibit B". Appellant received written notice of the entry of the Order Granting Joint Motion for Summary Judgment of Defendants Ceres Environmental Services, Inc.

and Beaufort County on February 11, 2022 and the Order Denying Plaintiff's Motion to Reconsider on March 1, 2022.

Respectfully submitted,

MOSS & KUHN, P.A.

By: 

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Beaufort, South Carolina
March 1, 2022

Other Counsel of Record:

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and TruckPro, LLC,

Defendants

Of Whom Ceres Environmental Services, Inc. and Beaufort County, A Political
Subdivision of the State of South Carolina are

Respondents.

CERTIFICATE OF SERVICE

The undersigned certifies that the **Notice of Appeal** to which this certificate is affixed, was served upon the parties to this action by depositing a copy of the same, enclosed in a first class, postpaid wrapper properly addressed to the following:

The Honorable Jerri Ann Roseneau
Clerk, Beaufort County Court of Common Pleas
Post Office Drawer 1228
Beaufort, SC 29901

O. Carlisle Edwards, Jr., Esquire
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in a post office or official depository under the exclusive care and custody of the United States

Postal Service on March 2nd, 2022.

MOSS & KUHN, P.A.

By: 

Sue Radford

LAW OFFICES

MOSS & KUHN P.A.

JAMES H. MOSS
H. FRED KUHN, JR.

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TELEPHONE 843-524-3373
FAX 843-524-1302

March 1, 2022

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SC Court of Appeals

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

RE: Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased v. DEH
Disaster Recovery, LLC, et al.
Case No.: 2017-CP-07-01739

Dear Ms. Kitchings:

Enclosed for filing you will find the original and one (1) copy of the Notice of Appeal in the above case. Also enclosed are the following:

1. Proof of service of the Notice of Appeal on Respondent.
2. Copies of the Order which are to be challenged on appeal.
3. Filing fee of \$250.00.
4. A self-addressed stamped envelope for the return of the filed copy.

With kindest regards, I am

Very truly yours,

MOSS & KUHN, P.A.

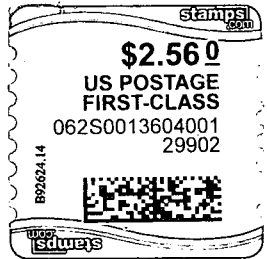

H. Fred Kuhn, Jr.

HFKjr:sr
Enclosures

RE: Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Deceased v. DEH Disaster Recovery, LLC, et al.

cc: The Honorable Jerri Ann Roseneau, Beaufort County Clerk of Court (w/enc.)
South Carolina Court Administration (w/enc.)
O. Carlisle Edwards, Jr., Esquire (w/enc.)
R. Patrick Flynn, Esquire (w/enc.)
Glynn L. Capell, Esquire (w/enc.)
Marc J. Meister, Esquire (w/enc.)
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To:

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