

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Circuit Court

J. Derham Cole, Circuit Court Judge

Case No. 2012-CP-42-2870

William F. Raeford, ..... Appellant,

v.

Jonas C. Solis, ..... Respondent.

NOTICE OF APPEAL

William F. Raeford appeals the order of the Honorable J. Derham Cole dated March 26, 2013 and filed March 28, 2013. Appellant received written notice of entry of this order April 8, 2013.

May 8, 2013

Respectfully submitted,

Blake A. Hewitt, Bar # 73674

John S. Nichols, Bar # 4210

BLUESTEIN NICHOLS

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**RECEIVED**  
MAY 08 2013  
SC Court of Appeals

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The Chad Pye Law Firm  
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Attorneys for Appellant

Other Counsel of Record:

Joseph W. Rohe, Esquire  
Robert D. Moseley, Jr., Esquire  
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Greenville, SC 29602

Attorneys for Respondent

J. Adam Russell, Esquire  
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P.O. Box 1509  
Greenville, SC 29602

Attorney for Appellant's Insurer  
(defending the case for the Respondent)

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent with a copy of the *Notice of Appeal and Notice of Appearance* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

Joseph W. Rohe, Esquire  
Robert D. Moseley, Jr., Esquire  
Smith Moore Leatherwood, LLP  
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Greenville, SC 29602

J. Adam Russell, Esquire  
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Greenville, SC 29602



Erin Bridges  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

May 8, 2013  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Circuit Court

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Case No. 2012-CP-42-2870

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**NOTICE OF APPEARANCE**

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Attorneys John Nichols and Blake Hewitt request that the court note their appearance in this case as counsel for the appellant, William F. Raeford. Attorney Chadwick D. Pye represented Mr. Raeford in the circuit court and remains counsel of record. See also Rule 264(a), SCACR (attorneys in the court below are deemed attorneys of record in an appeal).

Respectfully submitted,



Blake A. Hewitt, Bar # 73674

John S. Nichols, Bar # 4210

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Allison Paige Sullivan  
Ashley Trout Thompson  
Blake Alexander Hewitt  
Kenneth Henry Dojaquez

OF COUNSEL  
Osborne Eugene Powell, Jr

May 8, 2013

68369

**VIA HAND DELIVERY**

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

RE: William F. Raeford v. Jonas C. Solis  
Case No.: 2012-CP-42-2870

Dear Ms. Kitchings:

Attorney Chadwick Pye has retained me and Blake Hewitt to assist him as counsel for the Appellant, William F. Raeford. Please find enclosed the original and one (1) copy of a request to notice appearance.

Also, please find enclosed for filing the original and one (1) copy of a Notice of Appeal in this case. I have also enclosed the following:

- 1.) Proof of service of the notice of appeal on the respondent;
- 2.) A copy of the order which is to be challenged on appeal;
- 3.) A filing fee of \$100.00.

Please return the additional filed copy to me via our courier. Thank you in advance for your attention to this matter.

Sincerely,

John S. Nichols  
BLUESTEIN, NICHOLS, THOMPSON &  
DELGADO, LLC

JSN:emb

Enclosures

cc: Chadwick D. Pye, Esquire  
Joseph W. Rohe, Esquire  
Robert D. Moseley, Jr., Esquire  
J. Adam Russell, Esquire  
The Honorable M. Hope Blackley

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