

Court of Appeals of the State of Georgia

ATLANTA, August 31, 2026

The Court of Appeals hereby passes the following order:

A27A0242. RONALD S. HUNT v. HARRY SIMMONS et al.

**A27A0243. RONALD S. HUNT v. ALLSTATE PROPERTY AND CASUALTY
INSURANCE COMPANY.**

In this action for breach of contract and related claims, one defendant asserted several counterclaims with his answer. On May 14, 2026, the trial court granted a motion to dismiss filed by two of the four defendants. Pro se plaintiff Ronald Hunt filed a notice of appeal as to that order on June 10, 2026. That appeal has been docketed in this Court as Case No. A27A0242. On May 21, 2026, the trial court granted motions to dismiss filed by the other two defendants.¹ Hunt filed a notice of appeal as to those two orders on June 17, 2026. That appeal has been docketed in this Court as Case No. A27A0243. We lack jurisdiction over both appeals.

Under OCGA § 5-6-34(a)(1)(B), appeals generally may be taken from “[a]ll final judgments, that is to say, where the case is no longer pending in the court below.” In a case involving multiple parties or multiple claims, a decision adjudicating fewer than all the claims or the rights and liabilities of fewer than all the parties is not a final judgment. *Johnson v. Hosp. Corp. of Am.*, 192 Ga. App. 628, 629 (385 SE2d 731) (1989). For a party to obtain appellate review under such circumstances, there must

¹ In one of those orders, the court also granted one defendant’s motion for OCGA § 9-15-14 attorney fees in an amount to be determined. That ruling does not impact the finality of the trial court’s orders. See generally *Hill v. Buttram*, 255 Ga. App. 123, 124 (564 SE2d 531) (2002) (reservation of OCGA § 9-15-14 attorney fees issue does not extend the time to appeal).

be either an express determination by the trial court that there is no just reason for delay under OCGA § 9-11-54(b) or compliance with the interlocutory appeal requirements of OCGA § 5-6-34(b). See *id.* Where neither code section is followed, the appeal is premature and must be dismissed. *Id.*

Here, the record contains no indication that the trial court directed the entry of judgment under OCGA § 9-11-54(b) or that the remaining counterclaims in this action otherwise have been disposed of. Consequently, because no final judgment has been entered, Hunt was required to follow the interlocutory appeal procedures — including obtaining a certificate of immediate review from the trial court — to appeal the orders at issue here. See OCGA § 5-6-34(b); *Boyd v. State*, 191 Ga. App. 435, 435 (383 SE2d 906) (1989). His failure to do so deprives us of jurisdiction over these direct appeals, which are hereby DISMISSED. See *Bailey v. Bailey*, 266 Ga. 832, 833 (471 SE2d 213) (1996).



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Clerk's Office, Atlanta, 08/31/2026

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christina Bailey Smith

, Clerk.