

DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
(In The Supreme Court)  
Case No. 2021-001504

**RECEIVED**

JUL 05 2022

SC Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, SC Judge 2162  
Case No. 2021-CP-23-03689

---

JAYNE LaFORGE STOVALL

APPELLANT


V.

PAULETTE B. STOVALL

RESPONDENT

I certify that this designation contains no matter which is irrelevant to this Appeal

June 27, 2022

  
Jayne LaForge Stovall  
3197 Golden Oak  
Dallas, Texas 75234  
972-983-4712

APPELLATE CASENO. 2021-001504  
AUTHORITIES

1. SCPC Article 7, part 10, Sections 62-710-01 through 62-710-09.
2. SCPC 62-2-607 Order Restraining PR pertaining to Trustee, PR or Executor de son tort: wrongfully interfering with distribution of a deceased person's estate, or de son tort.
3. S. Carolina Code of Laws, Section 16910 (a) (1) Perjury under oath.
4. Canon 3 – A, sections 1,2,3, and 4 , Code of Conduct in its entirety of the United States Rules for Judicial Conduct

POINTS

5. Medical Report from W. Travis Wilson, M.D., dated August 16, 2010, Neurology Centers of the Carolinas, PA, confirming 8 prescription medications and 4 OTC's.
6. Medical Report from Roger C. Peace Outpatient Occupational Therapy dated 7-1-2011 describing patient's condition,
- 7 Photograph of note and card dated 12/2008 written by decedent, envelope addressed by Respondent.
- 8 Order in the Greenville Family Court dated April 26, 1973 by Judge James Roper containing William's testimony. See attached transcript section marked as #16.
9. Social Services Admission Report to the Woodlands dated 9/26/18, pages 7 and 10 of 11.
10. Daniel Casillas pictures and description of real estate still held by the Trusts in 2021 but never disclosed by Respondent.

11. Correspondence from George W. Lohr to and from Truluck firm 11/12/21 regarding "time-share" involved in Respondent's handling of Estate matters. Written via E-Mail to Truluck firm on day of hearing, inquiring as to status of hearing.

12, Arrest Record for domestic violence dated 4/4/05.

13. Brief and letter to Judge Jennings supposedly filed in Probate Court with copies to Truluck firm.

14. Listing of Only Financial Information Obtained In Discovery.

15. Payoff of Lisa's Mortgage of \$50,000 to be forgiven as part of her inheritance.

#### CASE REFERENCES

1. S. Carolina case #2019-CP-23-02960.

Authority #5 ✓

**NEUROLOGY CENTERS**  
of the Carolinas, P.A.

Multiple Sclerosis & Neuromuscular Disorders X Neurorehabilitation  
Disorders of Sleep & Fatigue X Stroke & Neurovascular Ultrasound  
Epilepsy & Clinical Neurophysiology X Muscular Dystrophy Association

August 16, 2010

Prescription medication 2010  
9 07C per

W. Travis Ellison, MD  
Internal Medicine of Greer  
P.O. Box 1150  
Greer, SC 29652

Patient: Walter Stovall  
Chart #: 82311

V

Dear Travis:

I had the pleasure of seeing Walter Stovall today in consultation regarding peripheral neuropathy. He is accompanied by his wife, Paulette, who helps with history. My assessment is as follows:

1. Chronic, progressive gait deterioration, most consistent with a diffuse peripheral neuropathy, likely related primarily to diabetes.
2. Low vitamin B-12 level of 91 on May 26, 2010, and replacement injections have been started.
3. Nerve conduction as part of the screening for a research study showed absent sural sensory responses and low amplitude peroneal motor responses with quite slow velocities in the 20s, consistent with a peripheral neuropathy with a significant axonal and demyelinating component.
4. Diabetes for decades, but with recent hemoglobin A1C of 6.5, consistent with good control.

Recommendations:

1. B-12 injection 1000 mcg weekly for four injections, then once a month.
2. He is counseled regarding the importance of consistent good blood sugar control and healthy exercise.
3. Followup here in four months, and he will call if there is any significant worsening.

Thank you for allowing me to participate in the care of this patient, and please call me if I can help clarify any issues.

(continued)

Robert A. Ringel, M.D.  
Bogdan P. Gheorghiu, M.D.  
Ernesto Potes, M.D.  
Paulo L. Zorfeia, M.D.

Robbie D. Buechler, M.D., Ph.D  
John F. Pilch, M.D.

www.neurologycc.net

Phone: 864.879.9395  
Fax: 864.879.9396

420A The Parkway  
Greer, S.C. 29650

Authority # 5

**NEUROLOGY CENTERS**  
of the Carolinas, P.A.  
August 16, 2010

Multiple Sclerosis & Neuromuscular Disorders X  
Disorders of Sleep & Fatigue X  
Epilepsy & Clinical Neurophysiology X  
Neurorehabilitation  
Stroke & Neurovascular Ultrasound  
Muscular Dystrophy Association

Patient: Walter Stovall  
Chart #: 82311  
Page -2-

To recap, this 74-year-old right-handed gentleman reports about five years of gradual progressive numbness and tightness in the feet, moving into the lower legs with decreased balance. He seems to have more trouble on stairs and cannot feel exactly where his feet are. He has been using a walking stick. He denies any significant symptoms in the hands. He has good control over bowel and bladder, and does not have any significant pain related to these symptoms. He denies visual disturbance, dysarthria, dysphagia.

He has had some workup as part of a screening process to try and enter a study regarding peripheral neuropathy, but he did not qualify.

Past medical history: Diabetes, hypertension, hyperlipidemia, depression.  
Medications: Glyburide, Glucophage, Actos, Zocor, HCTZ, Lisinopril, Norvasc, Lamictal, vitamin B-12, ibuprofen, Tylenol, potassium as needed for leg cramps, Guaifenesin for sinus congestion.  
Allergies: Augmentin.

Social history: Non-smoker, non-drinker, does not use recreational drugs.

Family history: Negative for neuromuscular disease. Father with bladder cancer. Mother with heart disease.

Review of systems: No meningitis, encephalitis, seizure or stroke. No hearing loss, tinnitus, vertigo. He has had some sinus congestion, and generally negative as per the comprehensive form.

Examination: This is a well-appearing, thin white male in no distress. Blood pressure: 146/70. Pulse: 64. Weight: 191-pounds. No rash or sign of trauma about head or neck. Neck: supple, no bruits. Lungs: Clear. Heart: Regular rate and rhythm. Extremities: Warm, no edema, with good distal pulses.

Neurologic: Speech clear. Appropriate in complex conversation. VF intact to FC. EOMI. No nystagmus. PERLL. Fundi: Sharp disks,  
(continued)

Robert A. Ringel, M.D.  
Bogdan P. Gheorghiu, M.D.  
Ernesto Potes, M.D.  
Paulo L. Zorzea, M.D.

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Authenticity #5

**NEUROLOGY CENTERS**

of the Carolinas, P.A.

August 19, 2010

Multiple Sclerosis & Neuromuscular Disorders ~~X~~ Neurorehabilitation  
Disorders of Sleep & Fatigue ~~X~~ Stroke & Neurovascular Ultrasound  
Epilepsy & Clinical Neurophysiology ~~X~~ Muscular Dystrophy Association


Patient: Walter Stovall

Chart #: 82311

Page -3-

normal vessels. Face: Symmetric. Normal strength and sensation to light touch and temperature. Tongue and palate move well in the midline.

Motor examination shows normal tone. There is decreased intrinsic foot muscle bulk. Strength is generally well-preserved with the exception of intrinsic foot muscles. DTRs: trace in upper extremities and at the knees, absent ankle jerks. Toes are downgoing. Sensation is decreased to vibration in the toes. Position sense reduced in the toes. Decreased temperature in the feet. Coordination: Normal finger-to-nose. Gait is on a mildly increased base, and he prefers to use his walking stick. He is unsteady with feet together and eyes closed.

Sincerely, 

Signed: John F. Pilch, M. D.

JFP:ll

#DS 404609

Received: August 18, 2010

Transcribed: August 19, 2010

Robert A. Ringel, M.D.  
Bogdan P. Gheorghiu, M.D.  
Ernesto Potes, M.D.  
Paulo L. Zortea, M.D.

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Authority # 6

100013373838 971235214  
STOVALL, WALTER STEVEN  
PILCH, JOHN F  
Admit Date - 07/01/11  
Date of Birth - 01/07/1936

## Roger C. Peace Outpatient Occupational Therapy

### Initial Plan of Care

(Certification Period from 7/1/2011- 9/29/2011) Diagnoses: Neuropathy and Gait Ataxia

Date of Onset: 4 years post Start of Care: 7/1/2011 Codes: v57.21, 357, 438.84, 799.52, 799.54

**PATIENT GOALS:** To drive independently with adaptive equipment.

**ASSESSMENT OF PATIENT PROBLEMS/FUNCTIONAL DEFICITS:** Mr. Stovall was referred for a Community Mobility Assessment to determine his ability to remain independent in the domain of Community Mobility with or without adaptive equipment. Formal evaluation reveals deficits in multiple areas. From a physical standpoint, Mr. Stovall presents with severely impaired sensation in bilateral lower extremities both for light touch and for Proprioception. This results in impairments in balance and gait. He reports having fallen at least 12 times over the last 4 years. In addition he reports impaired ability to detect where his foot is on the gas or brake pedal as well as how hard he is pushing on the pedals. He states he must ride the brake to make sure his foot utilizes the brake in a timely fashion, but is still unable to localize position on the pedal. In addition he demonstrated moderate to severe reaction time to access the brake in an emergency situation. This score was obtained after more than the usual amount of time allowed to practice. His overall gross motor coordination for bilateral upper and lower extremities was slow and effortful, especially with his feet.

In his report of current Community Mobility issues, Mr. Stovall acknowledged difficulties with his cognitive processing behind the wheel when his blood sugars were impaired. This apparently happens regularly. He reports having recently completed a very long trip but again acknowledged difficulties with sensation for the pedals. He reports increased difficulty with skills he was formally successful with, such as backing his boat. In fact he has not done this in some time due to these difficulties. Mr. Stovall's wife reports functioning as a co-pilot frequently, for issues of safety as well as topographical information.

Throughout the formal assessment, Mr. Stovall required increased time and repetition to comprehend even basic verbal directions. There were occasions where he lost concept during the structured cognitive/visual perceptual tests and required cues from this therapist to get back on track. There were also times where the structure of the test should have lead him to the change his approach if it was not working, however this executive function did not bear fruit, requiring coaching from this evaluator. His ability to process visual information was also impaired, resulting in slow visual scanning patterns and impaired visual attention for both simple and complex visual information. Although Mr. Stovall could report areas of deficits in all areas he did not demonstrate the ability to perceive how these deficits put him at risk behind the wheel. His ability to complete this formal evaluation required significant increase in the average time required for his peer group. This test generally takes 1.5 hours to complete and his time requirement was almost 3 hours.

All of the issues listed above place Mr. Stovall at great risk for danger to himself and others. His level of neuropathy indicates he currently is not safe to drive with his feet with standard pedals and would be appropriate for the use of adaptive equipment. However given his level of cognitive impairment, he is not appropriate or safe for an On Road assessment or training with adaptive equipment at this time.

Authenticity # 6

100013373838 971235214  
STOVALL, WALTER STEVEN  
PILCH, JOHN F  
Admit Date - 07/01/11  
Date of Birth - 01/07/1936

**Recommendations:**

- 1). Mr. Stovall is recommended to continue in an Occupational therapy treatment program to address issues of impaired cognition and visual information processing. He can receive that treatment program here at Roger C. Peace Rehabilitation Hospital. He can return to this program for a reassessment once he meets his therapeutic goals.
- 2). A full assessment by either Mr. Stovall's Primary Care physician or a referral to the Center for Success In Aging, to determine the cause of his cognitive deficits and develop a treatment plan regarding these deficits. A full Neuropsychological assessment might be appropriate as well.
- 3). It is recommended that Mr. Stovall cease driving immediately until these concerns are addressed and cleared by his physician to drive. Although Mr. Stovall reports a good driving history, he and his wife are now armed with information in regards to his current deficits and have been counseled on his risk to himself and others.
- 4). It is also recommended that Mr. Stovall discuss his Blood sugars and the results of ups and downs with his physician. This discussion should include the impact of these fluctuations on driving safety.

**Long Term Goal:** Mr. Stovall will demonstrate the ability to safely use adaptive equipment for driving for his community mobility needs.

Treatment plan: Outpatient Occupational Therapy 2-3x weeks for 12 weeks.

This Plan of Care was reviewed with Mr. Stovall and his wife.

*Leah Belle, OTR/L, CDRS, CDI 7-1-11 4pm*

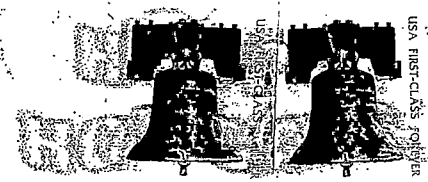
Leah Belle, OTR/L, CDRS, CDI 7-1-2011 4 pm

I have reviewed and approved this treatment plan and attached information. I certify this treatment plan for this patient who is under my care and who requires outpatient therapy services on a continuing basis since rehabilitation potential has not been reached. This plan is reviewed by me every 90 days.

Physician's signature \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_

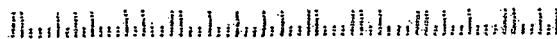
Walter S. Stovall  
410 Fairview Drive  
Greenville, S.C. 29609

Activity #11



Gayne Stovall  
3197 Golden Oak  
Dallas TX 75234

7523442337



There's a whole lot more  
where that came from, too.

Have a Great Christmas

Love

Gayne Stovall

I'm proud of  
your work with  
appraisal.



A & P #8

Excerpt from Roper's Order. Have original, but is on onion skin and fragile: ORDER is in the Family Court, signed by Judge James Roper on April 21, 1973:

"All testimony was recorded verbatim. Testimony was taken from the parties and further from the corresponding witness, the son of the parties, William Steven Stovall . I find that the Plaintiff has been beaten and kicked by the Defendant on several occasions, has performed acts of violence on other occasions, such as kicking a family pet animal.. I further find as a fact from the testimony taken by the Court, duly collaborate by the son of the parties, William Steven Stovall, that the material allegations as to physical cruelty by the Plaintiff's complaint are true and that the Plaintiff is entitles to an absolute divorce on those grounds."

In March, 1977, my Dad filed to have changes made to the divorce agreement/Order, including removing us from the house on Paris Mt. and changing visitation agreement, and monthly support agreement for the children . Judge Roper issued a restraining Order and on March 21, 1977 Judge Roper denied the petition, upped the maintenance amounts for the children, and chastised Dad for his use of pot during visitation.

Authenticity #9

**Support Service ID:**

**Dictation:**

AM 12:18:55 10/23/2018

CM made INITIAL CONTACT with Walter Stovall at Woodlands at Furman 1500 Trailhead Court Greenville, SC 29617 for the purpose of initiating a new investigation for possible Abuse & Neglect. CM reviewed DSS FORM 2416, HIPPA PRIVACY PRACTICES FORMS (DSS FORM 4000 and 4018) and DSS FORM 3795. Also present during the IC was the assisted living coordinator, Eddie Ward, LPN, and client's wife, Paulette Stovall. CM completed DSS FORM 1564 w/ client and obtained family/friend/professional member's names & contact information & found the following:

**INFORMATION:** CM introduced herself and stated the reason for the visit. Eddie stated while they are seeking a long term bed elsewhere because all of theirs are full, client will not be discharged home. Client is currently in the assisted living portion with a 24 hour caregiver as he took a drastic decline shortly after moving into the facility. Client has bipolar disorder, depression and Lewy Body Dementia with suicidal ideations. Due to client's behaviors, no local facilities are willing to take him. Mary Black Geri-psych, Springbrook, and CCBH all turned him down stating he did not meet the criteria for admission. Paulette stated she has been having to stay with client overnight to help keep him calm, assist with his showers and take him to doctor's appointments. Paulette stated she feels the report stems from client's daughter who lives in TX. Paulette stated there have been on-going family issues since she and client were married. Paulette stated Jane, client's daughter, lives with her mother still and is somewhat supported by client. Any time she needs money, she would ask him and he'd provide. Paulette feels Jane is concerned about client's finances with him being in placement and his funds having to pay for his care. As for the home environment, Paulette stated the home does need some minor repair, but client never wanted her to hire anyone to do the work. Paulette denies any physical abuse of client. Paulette stated client was very active up, taking boxing up until about 4 weeks ago when he couldn't stand up any longer. Paulette stated client's Parkinson's disease took control. Paulette stated client's daughter-in-law, Mary (509-954-9713) has already contacted A Place For Mom for assistance in finding client a SNF. Eddie states they are assisting with the process as well but there are no other concerns regarding client's current care.

**CLIENT'S APPEARANCE:** Client was observed to be wearing a shirt, pants, socks, shoes. Client was observed to be sitting in his wheelchair watching TV. Client was observed to be clean and free of visible marks or bruises. No foul odors were observed.

**PHYSICAL/FUNCTIONAL:** Client ambulates with the assistance of a wheelchair. Client has a 24 hour caregiver that assists with ADLs as well as his wife and other staff at the Woodlands.

**MENTAL/EMOTIONAL:** Client presents with a calm demeanor. Client is diagnosed with depression, Bipolar disorder, Parkinson's disease and Lewy Body Dementia. Client has a history of suicidal ideations. Due to client's behaviors, he is having a difficult time getting a SNF to accept him.

**INCOME/FINANCIAL:** Client receives SS-\$2200. Client receives Medicare: 257-46-4283 A/B and BCBS: ZCS38630480. Paulette manages client's funds and pays bills accordingly. Paulette stated client has a \$2 million estate.

**FOOD/NUTRITION:** Client has access to 3 meals and snacks daily.

**COMPLIANCE W/ MEDICAL TX:** Client is diagnosed with depression, diabetes, high lipids, HTN, heart disease, Parkinson's disease, BPH (enlarged prostate), degenerative disc disease, bipolar disorder, CIDP, dementia and Lewy Body Dementia. Client sees Dr. Travis Ellison for his primary care needs, Dr. John Pilch for neurology and Dr. Jeff Smith psychiatry. Client takes medications as prescribed.

**CLIENT VIEWPOINT:** Client was unable to provide his viewpoint due to his mental status.

**SUBSTANCE MISUSE/ABUSE:** Client does not have any issues with substance abuse/misuse.

**CAREGIVER (REACTION):** Both Eddie and Paulette are looking for SNF placement on client's behalf. Client will be have an unsafe discharge to the home due to his medical conditions. Client's placement wherever it will be, will be long term.

**FAMILY RELATIONSHIPS:** There is some dysfunction between client's daughter, Jane and his current wife, Paulette. Most of the issues seem to relate to money. There is no known history of violence.

#9

Action Date:	9/26/2018	Action Time:	4:11 PM	Time Spent:	0.50
Input Date:	9/26/2018	Input Time:	5:52 PM	Worker:	McBee, KIMBERLY

Service ID: 0001790685  
 Program Service Type: Investigations  
 Authorization:  
 Support Service ID:

Dictation:

PM 5:52:55 9/26/2018

CM made TC with the Assisted Living Coordinator, Eddie Ward (864-371-3190) at the Woodlands at Furman. Eddie stated there is no formal discharge date for client. Eddie stated he went to client's home about 3-4 weeks ago to complete a functional assessment. Eddie stated at that time, client made a 26 out of 30 on a mini-mental. Eddie stated the home was cluttered but not deplorable by any means. Eddie stated based on his assessment, client was admitted into the Woodlands the beginning of September. Eddie stated client's wife, Paulette (864-322-9651-home and 864-907-8619 cell) neglected to tell them all of client's diagnoses. Eddie stated he believes Paulette was experiencing caregiver burnout and simply needed him placed. Eddie stated client goes every 4-6 weeks for IVIG infusions for CIDP (chronic inflammatory demyelinating polyradiculoneuropathy). Eddie further stated Paulette is client's POA. Eddie stated client has a son, William (509-954-9707) who lives in Washington that is a physician and allowed to share information with but requested them not to share info with his daughter who lives in TX. Eddie stated client was recently diagnosed with Lewy Body Dementia, has Bipolar disorder and what appears to psychosis. Eddie stated client has expressed homicidal and suicidal ideations and has been sent to GHS ER twice with hopes of getting him committed to MIP or other psychiatric facility for med management and stabilization. Eddie stated both times, client was treated over-night and sent back to the facility. Eddie stated client has had a recent decline in mobility and needs coaching for eating. Client also requires assistance with dressing, bathing, toileting, transferring. Client currently has a 24 hour companion sitter through Interim HH and his wife is there at night to help keep him calm. Eddie stated client's level of care is skilled nursing and unfortunately, all of their long term skilled nursing beds are full. Eddie stated they are attempting to find other placement options but no one is willing to accept him due to his psychiatric behaviors. Eddie stated client met with his PCP today and will be seeing a psychiatrist on Oct. 3, 2018. Eddie stated they are hoping for referrals that will assist in placement. Eddie will meet with CM at the facility on 09/27/18 at 10:30 AM. CM thanked him for speaking with her.

KM

3/4/2021

Re: Wellford property- Stovall Trust

*Wellford? Fu # 10*

From: "Daniel Casillas" <daniel@tbccre.com>  
To: jaynestovall39@twc.com  
Cc:  
Bcc:  
Priority: Normal  
Date: Thursday March 4 2021 9:20:03AM  
Re: Wellford property- Stovall Trust

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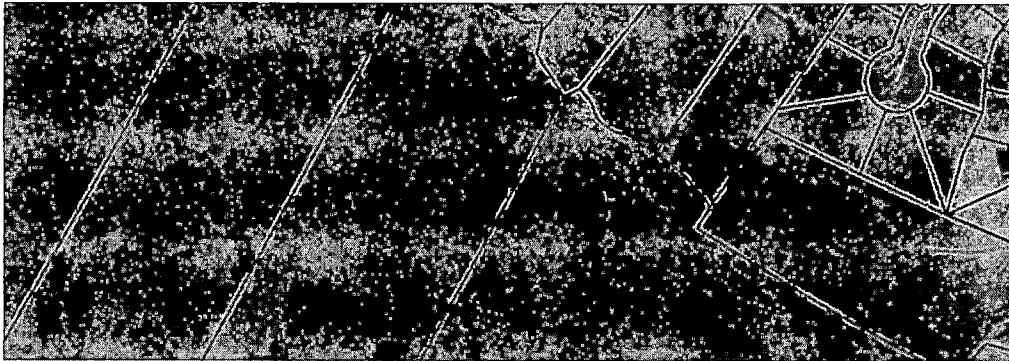
Jayne,

Have you had a chance to look at this parcel? Any idea what the trust plans to do with the property?

On Thu, Feb 18, 2021 at 10:43 AM Daniel Casillas <daniel@tbccre.com> wrote:

Jayne,

Thank you for returning my call regarding the parcel in Wellford. Like I mentioned, the adjacent parcel will likely be put on the market for sale soon and I reached out to discuss your level of interest in a sale. This is a screenshot of the parcel:



It is Spartanburg County Tax Map #5-16-09-075.00

Please let me know if you have any questions or if I can be of help in any way. I look forward to staying in touch.

Respectfully,

--

11/12/21, 11:47 AM

FW: Checking in

# Authority H

From: "Sonya" <sonya@truluckthomason.com>  
To: "wendywhite521@gmail.com" <wendywhite521@gmail.com>, "Mary Stovall" <stovall.maryk@gmail.com>, "JayneStovall39@twg.com" <JayneStovall39@twc.com>, "Clayton Jennings" <clayton@jenningslawfirm.com>  
Cc:  
Bcc:  
Priority: Normal  
Date: Friday November 12 2021 11:11:28AM  
FW: Checking in

Just making sure that everyone had the login for the hearing today.



## Sonya Autrey

Litigation Paralegal

sonya@truluckthomason.com

3 Boyce Avenue, Greenville, SC 29601

T 864-331-1751 F 864-243-8115

truluckthomason.com

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From: Bill Lohr <george.w.lohr@gmail.com>  
Date: Friday, November 12, 2021 at 10:46 AM  
To: Sonya <sonya@truluckthomason.com>  
Cc: Kimberly Thomason <kim@truluckthomason.com>  
Subject: Re: Checking in

11/12/21, 11:47 AM

FW: Checking in

truluckthomason.com

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---

**From:** Bill Lohr <george.w.lohr@gmail.com>  
**Date:** Thursday, November 11, 2021 at 6:40 PM  
**To:** Sonya <sonya@truluckthomason.com>  
**Cc:** Kimberly Thomason <kim@truluckthomason.com>  
**Subject:** Checking in

Hi Sonya,

Just checking in to learn if we are closer to closing the Estate. Thanks

Best,

Bill

--

| Bill Lohr | 650.888.7162 (m) | george.w.lohr@gmail.com

Sent from my iPhone

Kim - what can we do proactively to close this out? I don't want to keep your team engaged in a fulfill effort only to continue to incur charges. Please advise. Thanks

Best,

*San Francisco Bay area*

Bill

| Bill Lohr | 650.888.7162 (m) | george.w.lohr@gmail.com

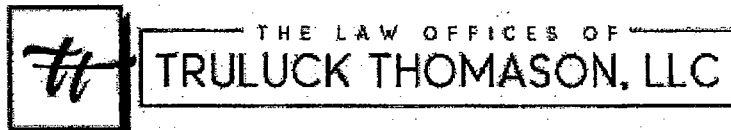
Sent from my iPhone

On Nov 12, 2021, at 5:09 AM, Sonya <sonya@truluckthomason.com> wrote:

Bill:

I have contacted the time share attorney at least 3 times since your last email and am having a very hard time getting him to call me back. I will be calling and emailing again this morning. I will keep you posted.

Thanks,



**Sonya Autrey**

Litigation Paralegal

sonya@truluckthomason.com

3 Boyce Avenue, Greenville, SC 29601

T 864-331-1751 F 864-243-8115

*Handwritten signature*

CHIPS: No results were found

**Criminal:**

Name Charge Code - Charge Description Original Charge Code - Original Charge Disposition Date  
Stovall, Walter Steven 2671-Domestic / Criminal Domestic Violence - 1st offense 2671-Domestic / Criminal  
Domestic Violence - 1st offense 04/04/2005  
GUILTY Bench Trial

**Melissa Data Information:**

Address Verified  
(AS01)

Address 410 Fairview Dr  
Greenville SC 29609-6641

Melissa Address Key (MAK) 3897874343

Postal Carrier Route R012 Map

Address Type Residential  
Name at Address WALTER STOVALL  
Property Information Property Owner

Time Zone (Local time) Eastern Time ( 9/25/2018 11:07:40 AM )  
Census Entities City or Town Not within a Census Place  
County Greenville 45045 Map  
Tract 0027.01 Map  
Block 2023 Map  
County Subdivision Greenville Map

Schools Unified 4502310 Greenville County School District Map

Congress Rep. Trey Gowdy (R) (04)

State Upper District 006 Map

State Lower District 019 Map

Delivery Post Office Greenville  
600 W Washington St  
Greenville SC 29602 Map  
Phone: 864-282-8421

A-13-1

July 8, 2021

TO: Judge Jennings, Greenville Probate Court

FROM: Joan Martin

RE: Final Hearing July 7th, Case No. 2018ES23-02556 Estate of Walter Steven Stovall

Judge Jennings:

I was present at the Zoom hearing on May 19<sup>th</sup> at 10:00 A.M. when you made inappropriate remarks to my daughter, Jayne Stovall, asking if she was "on something" and then badgering her saying "you will lose" repeatedly because she no longer has an attorney after Chase Campbell withdrew. She has used all of her savings paying him, and he did absolutely nothing but run up fees in an attempt to get medical records in order to have the Trusts and Will deemed invalid over a two- year period. She kept telling him that she just wanted the financial information to which she was entitled as Co- Trustee and beneficiary of the Trusts. When she took over the case pro se, that was all she wanted. She was not able to get a pro bono attorney through Legal Aid because she was told the Estate was too great.

Today I was asked to testify. I had already submitted my written deposition to your office and to Truluck because I have essential tremor that has ruined my vocal cords. You were rude to me and you also kept cutting Jayne off mid-sentence, not letting her reply to the questions she had prepared to answer. It is my understanding that the Truluck firm will likely be preparing the Order for you to sign. All Jayne wanted was to have an independent administrator appointed and a forensic audit obtained. Evidently you did not recall that her brother, William Stovall, should not be allowed to serve as co-trustee, as he is a pedophile and sexually abused his sister, Lisa, as a small child for years. Lisa is ready and willing to testify to his actions. He and his wife Mary threatened Jayne with the old psychological evaluation at Paulette's request in an effort to get Jayne removed as co trustee, I suspect he has been paid off to cooperate. All this evidence and information has been sent to your Court and to the Truluck firm, and we have copies of all of it, and supposedly the hearing earlier today was recorded.

Jayne is a gentle, kind person and does not react well to personal attack. I am not, and intend to help her in every way I can. She has never had any wish to be a co trustee, and only wanted the financial information to which she was entitled but never received. And she was never, ever contacted by Paulette before or after her Dad died, except after Jayne hired an attorney to get a copy of the Will and Trusts, and then only through attorneys. This is not over.

Joan Scanling Martin

/jsm

# Authenticity 13  
→

First Opposition Brief for Judge Jennings and the July 7<sup>th</sup> Probate Court Hearing.  
Case #2018ES-23-02556. Estate of Walter Steven Stovall.

To be filed in response to Respondent Paulette Stovall's Motion for Summary Judgement filed on June 2, 2021 in Greenville County Probate Court.

INTRODUCTION; My Dad died two and a half years ago. In his Will and two Trust documents I am a co-Trustee with Paulette Stovall, and I am a beneficiary of both Trusts. I received no communication from Paulette Stovall before Dad's death to date, other than through our respective lawyers. I am now handling the case myself, as I have no more funds to pay another lawyer. The Greenville Lawyer Referral Service denied pro bono counsel for me and for my sister, Lisa Rodriguez, because they stated there was too much money in my Dad's estate.

MEMORANDUM OF POINTS AND AUTHORITIES:

Co-Trustee Paulette Stovall has failed to perform the duties of Co-Trustee as required by South Carolina Probate Code rules: Article 7, Part 10, Section's 6-27-1001 through 6-27-1009, and specifically Section 6-27-1004, which reads " Trust should be restored to what it would have been had the harm not occurred". In this case, there are two Trusts involved. See Trust documents on file with the Court.

Co-trustee Paulette Stovall has refused to release complete financial records, and refused to agree to release of Dad's medical records citing HIPPA laws, although S. Carolina law provides that medical records and financial records can be ordered by the court if relevant to the case. See attached listing of the financial information I do have

Co-Trustee Paulette Stovall foreclosed on my sister, Lisa Rodriguez's home here in Dallas four months BEFORE my Dad'died, sold it, and my sister has received nothing. My Dad had a \$48,000 lien on the property that was to be forgiven at his death. Lisa is owed the total amount of money received for the sale of her house, which is likely about \$150,000, as she had a lot of equity already in it before Dad paid off the balance of the mortgage, which was \$48,000.00.

My brother, William Stovall, has committed perjury under oath, before this court, about his relationship to my Dad, my Dad's history of illness, and my purported lack of cooperation with Paulette Stovall in this matter. He gave false information as to my physical and mental health which he knows absolutely nothing about, as well as comments about my Dad sending me money when I requested it, knowing this is not true. This is clearly a misdemeanor according to S. Carolina Code of Laws, Section 16910, (a) (1).

My brother's wife, Mary Stovall, has been the person corresponding with Paulette Stovall before and after my Dad's death, advising her as to how to proceed: Documents provided on PDF files sent FROM the Truluck firm to my attorney confirm . There are over 100 pages of garbage in that PDF, but several pages of partial reports from authorities in Greenville including

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medical, mental, and physical assessments of my Dad on his admission for care at the Woodlands two months before his death, confirming his long history of physical and mental illness, and a police report showing his arrest for domestic violence during his marriage to Respondent Paulette Stovall. The intake documents from the Woodland include Paulette's statements about the amount of money in Dad's estate being "two million dollars", and that she instructed the people taking care of Dad not to give me any information about Dad's condition. The entire PDF from Truluck supposedly is part of the Court file.

CONCLUSION: I have submitted ALL OF THE INFORMATION I HAVE to the Court and to three attorneys at the Truluck firm over these past two and a half years to date. I am asking the Court to appoint an independent special administrator and to order a forensic accounting of my Dad's estate, to be paid for by the Estate. I am also asking for reimbursement of my legal fees from the Estate, per the instructions in the Trusts and my Dad's Will. I respectfully request that Respondent's Motion for Summary Judgement in her favor be denied.

I declare under penalty of S. Carolina law that the foregoing statements are true and correct. The financial information is all that I have been able to obtain.

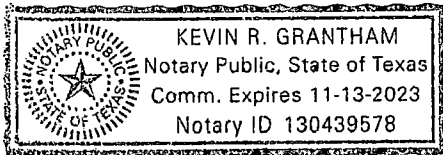
Jayne Stovall 06/07/21

Jayne LaForge Stovall, Petitioner

State of Texas  
County of Dallas

Sworn to and subscribed before me on this  
7<sup>th</sup> day of June, 2021

by JAYNE STOVALL  
  
notary public signature



*Arthur State Bank #19*

Financial information available to date, 4/7/22:

Four Penfed CD's supposedly jointly owned, furnished by Paulette Stovall's attorneys in letter to Jayne's attorney in 20/19: \$115,963.29; \$115,963.29; \$115,438.56; and \$171,153.83, for a total of \$568,518.97. The two for the same amount show different ID numbers. No beneficiary designations provided. The following Grandsouth, Sharonview, Pentagon and Penfed amounts below also submitted by Paulette's attorney:

Grandsouth IRA: \$245,884.03. Opened in 2008 and signed off on by Paulette Stovall on 6/25/13. No beneficiary information.

Sharonview IRA CID #70186: \$129,059.50. No beneficiary information.

Ascensus Trust: \$303,220.00: No beneficiary designation, but Jayne's signature required for RMD's or cashing in. Believe Jayne is beneficiary.

Pentagon IRA. No amount or number given, beneficiary is William Stovall, SSN 246-06-2164. Signed off on by Paulette Stovall on 6/25/2013. Penfed IRA: \$100,918.34. No beneficiary given.

Penfed IRA Certificate #9287, \$165,938.09. No beneficiary information provided.

Unsold Property owned by the "family trust" but not disclosed by Paulette Stovall. Information obtained from public records and from a contact from Daniel Casillas, a broker in Greenville, S. Carolina, 37 Villa Road, Suite #200, Greenville, S. Carolina, 29615, who was interested in two of them:

1. Compton Drive \$72,000; Greenville Highway, \$186,500; Orla Street Extension, \$199,000; Dela Grave, \$140,000. Castillo also says there are two more parcels in Greer totaling 3.59 acres, and an additional 5.38 acre parcel down the street from the Greenville Highway Property.
2. Time share property discovered in an E-Mail inadvertently sent by Paulette's attorney about on-going time share litigation against the estate from a person named Bill Lohr in California, tel. 659.888.7162, [george.w.lohr@gmail.com](mailto:george.w.lohr@gmail.com). E-mail dated 11/11/21.
3. Several checking account numbers and savings account numbers were on PDF, but no amounts or information, and exchanged only between the lawyers, along with one tax return, but information blanked out. In the Will, "Arthur State Bank" is listed as substitute Personal Representative if Jayne or her brother, William, could not serve.

Of note, we have hard copies of most documents, if you need copies. We are also aware that Walter bought and sold several pieces of real estate, including rental houses, over the period before, up to and after, the new Trust documents and Will were drawn in 2012, and 2013.

A + P #15

Wire Transfer Request Form

**WIRE FROM:**

Member Name Walter Stovall  
Address 410 Fairview Drive  
Phone # 864-322-9651  
Credit Union Acct# 2356-030  
Wire amount \$ 50832.31  
GL.#73300/Int'l Wires GL #74401  
Wire fee  
GL#13100/Int'l Wires GL #74401

\_\_\_\_\_ (\$10.00 For Domestic)  
\_\_\_\_\_ (\$27.50 For International in US Currency)  
\_\_\_\_\_ (\$10.00 For International in Foreign Currency)

**WIRE TO:**

Financial Institution J.P. Morgan Chase Bank  
Address 1 Bank One Plaza  
Chicago, IL 60606  
ABA# (Swift Code) 021 0000 21  
For Further Credit GMAC Mortgage Of PA  
(Account Payee Name or Financial Institution Name)  
Address \_\_\_\_\_  
Account # 662631175  
For Final Credit To Lisa Rodriguez  
(Account Payee Name)  
Address \_\_\_\_\_  
Account # GMAC #311057590

Greenville Federal Credit Union will wire funds at your request to the above named account. Greenville Federal Credit Union assumes no responsibility as to the ownership of the receiving account. Wire Transfers are governed under Regulation J.

Walter Stovall 03-22-2007  
Member Signature Date

DATE:  

*Hi Sol!*  
*I am sending a letter from the mortgage company and a copy of the WIRE TRANSFER For the payoff. I will call you ONCE you have had a chance to see this.*  
*Darlene Stovall*  
*864-322-9651*

THE STATE OF SOUTH CAROLINA

In The Court of Appeals  
(In The Supreme Court)

**RECEIVED**

JUL 05 2022

**SC Court of Appeals**

APPEAL FROM GREENVILLE COUNTY

Court of Common Pleas

Letitia H. Verdin, SC Judge 2162

Case No. 2021-CP-23-03689

Court of Appeals Case No: 2021-001504

Jayne LaForge Stovall

Appellant

V

Paulette B. Stovall and

Respondent

William S. Stovall

Defendant

PROOF OF SERVICE

I certify that I have served the Initial Brief and Designation of Matter on Paulette B. Stovall by depositing a copy of it in the United States Mail, postage prepaid, on June 27, 2022, addressed to her attorney of record, Devon Puriefoy, at 3 Boyce Avenue, Greenville, S. Carolina, 29691, and to Defendant William S. Stovall, pro se, at 1305 North King James Lane, Liberty Lake, Washington 99019.



Jayne LaForge Stovall  
3197 Golden Oak Ct.  
Dallas, Texas 75234  
972-983-4712  
Pro Se Appellant

June 27, 2022

**RECEIVED**  
JUL 05 2022  
SC Court of Appeals

TO: Jenny Abbott Kitchings, SCCA Clerk

FROM: Jayne Stovall

RE: Appellate Case No. 2021-001504

Enclosed is the revised Initial Brief and Designation of Matter. I have received your letter with the enclosed copy of the one from Claire Allen. Actually, LaToyla was kind enough to send me the same copy on June 23<sup>rd</sup> by E-Mail and PDF. When you had advised that the Appeal had been reactivated in your letter, filed on June 9<sup>th</sup>, it is stated that I had thirty days from that date to file the Initial Brief. Since I had already prepared the Brief and sent it to your offices back in March, before the Appeal was denied, I am assuming that the revised Brief and Designation of Matter enclosed is due no later than July 9<sup>th</sup>.

I have made the corrections and additions requested to the best of my ability with the computer I have, and it is necessary for me to make trips to obtain multiple copies, and to FAX or send material by the USPS. If there is a problem, I would appreciate it if you or LaToyla would E-Mail or call me. Otherwise, I will assume there is nothing else I need to do until I hear further from you. I sincerely appreciate your help, as this ordeal has been going on for three and a half years and has still not been resolved.

*Jayne S. Stovall*

Jayne LaForge Stovall

/jls

Enclosure: Initial Brief and Designation of Matter

