

**FILED**

**22 JUN -1 PM 2:32**

**PROBATE COURT  
CHARLESTON COUNTY**

STATE OF SOUTH CAROLINA )

IN THE PROBATE COURT

COUNTY OF CHARLESTON )

CASE NO. 2015ES10-00751

IN THE MATTER OF:  
Virginia G. Pinckney (Decedent)

WAVERLY PINCKNEY, )

Petitioner, )

**SUMMONS**

v. )

JOSEPH GOODWATER, ISAAC )  
GOODWATER and WAVERLY )  
GOODWATER, )

Respondents. )

**RECEIVED**

**AUG 01 2022**

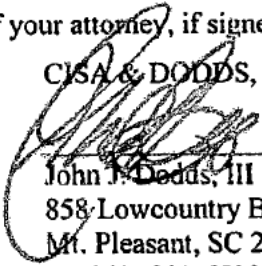
**SC Court of Appeals**

**TO THE RESPONDENT, JOSEPH GOODWATER:**

**YOU ARE HEREBY SUMMONED** and required to answer the Petition in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer upon the subscribers at their office located at 858 Lowcountry Boulevard, Suite 101, Mount Pleasant, South Carolina 29464, within thirty (30) days after service hereof, exclusive of the date of such service; and if you fail to answer the Petition within the time aforesaid, the Petitioner in this action will apply to the Court for judgment by default for the relief demanded in the Petition. Your answer must be in writing and signed by you or your attorney and must state your address or the address of your attorney, if signed by your attorney.

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**ATTORNEY FOR PETITIONER**

Mt. Pleasant, SC

May 31, 2022.

**THREE:** Upon information and belief, Petitioner is entitled to an Order from this honorable Court declaring the Quit Claim Deed recorded in Book 0607, at Page 115 and re-recorded in Book 1104, at Page 298 void, restraining and enjoining Respondent, Joseph Goodwater, from recording and/or re-recording and Deeds of any kind transferring any real property owned by Virginia G. Pinckney and/or any real property not owned by Joseph Goodwater, and awarding Petitioner and/or his undersigned legal counsel damages including reasonable attorney fees and the costs of this action.

WHEREFORE, Petitioner prays unto this honorable Court as follows:

**ONE:** That this honorable Court issue an Order declaring the Quit Claim Deed recorded in Book 0607, at Page 115 and re-recorded in Book 1104, at Page 298 void, restraining and enjoining Respondent, Joseph Goodwater, from recording and/or re-recording and Deeds of any kind transferring any real property owned by Virginia G. Pinckney and/or any real property not owned by Joseph Goodwater, and awarding Petitioner damages as determined by this Court including reasonable attorney fees and the costs of this action; and

**TWO:** For such other and further relief as is just and proper.

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*May 31, 2002.*