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Nov 10 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS

THE HONORABLE GORDON G. COOPER
CASE NO. 2020-CP-42-02447
APPELLATE CASE NO.: 2021-000516

Larry Bright,

Appellant,

versus

Heather D. Davis and Midfirst Bank,

Respondent

MOTION TO SUBSTITUTE PARTY

Richard H. Rhodes, Esquire
William H. Rhodes, Esquire
Burts, Turner & Rhodes
Attorneys for the Appellant
260 North Church Street
Spartanburg, SC 29306
(864) 585-8166

Ronald G. Bruce, Esquire
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Greer, SC 29650
(864) 877-0207

Attorneys for Appellant

November 10, 2022

STATE OF SOUTH CAROLINA)
)
COUNTY OF SPARTANBURG)

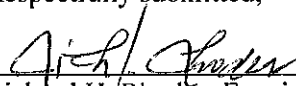
Larry Bright,)
)
Appellant)
)
vs.)
)
Heather D. Davis, Midfirst Bank,)
)
Respondents.)
_____)

IN THE COURT OF APPEALS

MOTION TO SUBSTITUTE PARTY
2020-CP-42-02447
APPELLATE CASE NO.: 2021-000516

1. Richard H. Rhodes, Esquire, as attorney for the Appellant, Larry Bright, does hereby file this Motion to substitute Joni B. Wortkoetter as the Appellant.
2. Larry Bright died October 4, 2022; his estate is being administered in the Probate Court of Spartanburg County, reference being made to Probate File Number 2022-ES-42-1974.
3. Joni B. Wortkoetter is the Personal Representative of the Larry D. Bright Estate.
4. This pending appeal involves ownership of real property, and the death of Larry D. Bright does not extinguish the pending action.

WHEREFORE, the Petitioner prays that the Court substitute Joni B. Wortkoetter, Personal Representative of the Larry D. Bright Estate, as the Appellant.

Respectfully submitted,


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STATE OF SOUTH CAROLINA
COUNTY OF SPARTANBURG

PROBATE COURT

IN THE MATTER OF LARRY D. BRIGHT SR. AKA LARRY DEAN BRIGHT

CASE NUMBER 2022ES4201974

CERTIFICATE OF APPOINTMENT

This is to certify that

MS. JONI B. WORTKOETTER

is/are the duly qualified

- PERSONAL REPRESENTATIVE
- GUARDIAN
- CONSERVATOR
- TRUSTEE
- _____

in the above matter and that this appointment, having been executed on the 9th day of November, 2022, now in full force and effect, including authorization to receive all monies, income, principal, interest & dividends of and belonging to said estate.

RESTRICTIONS:

NONE.

Executed this 9th day of November, 2022.

Ponda A. Caldwell

Ponda A. Caldwell, Probate Court Judge

Do not accept a copy of this certificate without the raised seal of the Probate Court.

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Larry Bright,

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versus

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Respondent

PROOF OF DELIVERY

This is to certify that on the 10th day of November, 2022, the undersigned, secretary to Richard H. Rhodes, Esq., served a copy of the **APPELLANT'S MOTION FOR SUBSTITUTION OF PARTY** by emailing a copy to the following:

Daniel R. Hughes, Esquire
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4000 Faber Place Drive, Suite 450
North Charleston SC 29405
mcreech@finkellaw.com


JO ANN CHAMPION

SWORN to before me this 10th
day of November, 2022

 (SEAL)
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: June⁶ 2028