

13/31/2023
RECEIVED

APR 03 2023

SC Court of Appeals

Motion

98544

Comes now Carolyn Tolbert Smith, Appellant in Case No: 2022 001815, pertaining to remittitur from the SC Court of Appeals.

Remittitur is as provided by Rule 221(B) of the

SC Appellate Court Rules. The Court granted

the Respondent judgment, to Respondent's

Motion To Dismiss with prejudice Appellant's

Appeal of Order [Judgment] of the Circuit

Court'sie, granting Summary judgment to

Charles Leon McMillian, III AKA, Charles

Tolbert, the estranged grandson of the de-

cedent, Helen Alice Grant Tolbert. Charles is

an heir who contributed "0" zero to the

subject property but insists upon buying

and selling the property, leaving me, the

eighty-five, 85 y.o. old aunt, without the roof, any roof over her head. The Appellant is that dedicated child

child who always ran to help her parents in their need and also for merry making holidays and every summer for the children; in 1960 for Ma's mastectomy; in 1985-1987 for Ma's Colon and liver operation and for Pa + Ma's 50th wedding anniversary; every Christmas the whole season, Appellant gave of self significantly for my siblings; gave much to Charles and Charla as did our Ma, Helen. I gave less to Keith was hardly ever with Ma + Pa.

^{was} It was only natural for my family and me to join Pa + Ma again in their golden years when they needed their children most. Their extremely gifted, (voice) talented, firstborn had died New Years Day, 1995, Cancer. She sang most melodiously at my husband's funeral in 1992. Before all the death there were beautiful memories

Made among us, memories to be preserved. Below please observe with indulgence and care the reason listed why I pray the Court of Appeals for South Carolina reinstate my appeal in Case NO.: 2022 001815.

Motion To Reinstate

Appellant, Carolyn Tolbert Smith, according to Rule 260(c) of the SC

Appellant begs the South Carolina Court of Appeals to reinstate the Appellant's case against Order [Judgment] by the Honorable Judge Mikoll Scarborough which Respondent, Attorney Ashley Andrews filed a motion against, motion To Dismiss Order granted, filed March 22, 2023 against Appellant's appeal.

1. Please observe with care the extenuating Circum-

stances that have merit herein but that also

can be dammaging. I; Defendant ~~Dependant~~

relied heavily on Counsel to appeal the judge's

decision. She refused. I feared a second

loss except via appealing. I was left dangling,

Pro Se, alone, no legal expertise, against 3 attys did ~~best~~

2. Counsel for me pointed out in writing, win-

ning statements in favor of my prevailing in my

Claim of, "Title per Adverse Possession, not heard.

3. The judge heard first arguments for Summary

Judgment. No argument was heard by my Counsel,

4 Plaintiffs' attorney, one of their three (3)

* ^{4b} Master In Equity barred, ^{5b} "Duster" proven by facts given by me attys - attorneys plus one more Plaintiff Pro Se, used

false information, accusing me of having executed

several Deeds of Dist'. My former attorney

executed one Deed of Dist' which I myself

signed. Counsel for Plaintiffs executed several Deeds of Dist'

Cont

Several Deeds of Distribution. I, Defen-

dant, have the proof among my exhibits.

5. By and through that action Plaintiffs were

allowed to be granted summary judgment. The

judge

was then able to announce that the sixth ele-

ment, Ouster, among the elements to be satis-

fied, is defeated by said Deed of Dist which

Plaintiff's Counsel Ashley Andrews stated

&

falsely. This egregious act led me to mis-

trust of the circuit court. Then Counsel refused me.

7 It seem unamerican, having in a court of

law a one man or one woman judge and jury.

8. The Last Will And Testament of my mo-

ther, the decedant, is not to be ignored. there

is no indication therein that she approved

of having her property ever sold. The intent

therein is to preserve her property for generations.

9. Appellant sorely needs and deserves my day in court. five attorneys contacted by me were unable to assist

10. stymied by Respondent's Motion To Dismiss,

Appellant's efforts to satisfy, to correct

the the matter of service of Designation of

the Matter and Record on Appeal all at the SC

Court of Appeals earlier. Because I learned late I'm

there now ID. ^b By reinstating of my appeal the traasty of justice from the Circuit Court fails.

11. My dearest desire is that justice be consi-

dered and be placed above all else; that trick-

ery at the circuit level not be allowed upon in-

vestigation, regarding said deed of Dist; the de-

cedents Last Will and Testament prevent the

sale of subject property, a legacy of love to be

preserved for countless caring generations.

please see attachments,

Ret'd To The Motion



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29211
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www.sccourts.org

January 10, 2023

Carolyn Tolbert Smith
338 5th Avenue
Mount Pleasant SC 29454

Re: Keith Tolbert v. Carolyn Smith
Appellate Case No. 2022-001815

RECEIVED

APR 03 2023

SC Court of Appeals

Keith L. Tolbert, Respondent,

v.

Carolyn Tolbert Smith, Charles Tolbert, Betty Jean Tolbert Jones, Sara Jo Tolbert Latten, and Estate of Charla Tolbert McMillian, Defendants,

Of whom Carolyn Tolbert Smith is the Appellant,

and

Charles Tolbert, Betty Jean Tolbert Jones, Sara Jo Tolbert Latten, and Estate of Charla Tolbert McMillian are the Respondents.

Exhibit A

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE PROBATE COURT

IN THE MATTER OF : FRED WILLIAM TOLBERT

CASE NO. 2001ES10-01196

CASB 2010 ES 10 1352

CERTIFICATE OF APPOINTMENT

CAROLYN TOLBERT SMITH

is/are the duly qualified

- XX PERSONAL REPRESENTATIVE
- GUARDIAN
- CONSERVATOR
- TRUSTEE(S)
- SPECIAL ADMINISTRATOR

IN THE ABOVE MATTER AND THAT THIS APPOINTMENT, HAVING BEEN EXECUTED ON THE 27TH DAY of NOVEMBER 2001, IS NOW IN FULL FORCE AND EFFECT, INCLUDING AUTHORIZATION TO RECEIVE ALL MONIES, INCOME, PRINCIPLE, INTERESTS AND DIVIDENDS OF AND BELONGING TO SAID ESTATE.

Note: The receiver, by virtue of the/this assignment, must adhere to the court's written order of distribution. egs.

RESTRICTIONS: NONE

Executed this the 27TH DAY of NOVEMBER 2001



**IRVIN G. CONDON
JUDGE OF PROBATE
BY ESTATE CLERK**

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

Form # 141PC (7/87)
SCFC 1-305, 3-103, 5-304, 5-43141, 7-3140 1

A2

Attorney's Argument in defence of the
then Defendant in case 2021 CP 10 04058

This argument has never ever been heard

Keith L. Tolbert v. Carolyn Tolbert-Smith, et al.
Case No. 2021-CP-10-04058
DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

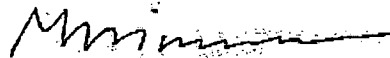
This is an
egregious
travesty of
Justice
promised
in the
Pledge of
Allegiance of
our country,
- U.S.A.

RESPONSE:

Defendant states that she has made no attempts, proposals or offers to make rental payments while she has resided at the Property.

Respectfully submitted,

FINKEL LAW FIRM LLC



Malena A. Dinwoodie (S.C. Bar No. 103978)
4000 Faber Place Drive, Suite 450
North Charleston, South Carolina 29405
(843) 577-5460
mdinwoodie@finkellaw.com
Attorneys for Defendant Carolyn Tolbert-Smith

Date: July 28, 2022

Atty. Dinwoode's Argument
in defence of Defendant
C. Tolbert Smith

Keith L. Tolbert v. Carolyn Tolbert-Smith, et al.

Case No. 2021-CP-10-04058

DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

heirs not only share an interest in the estate property, but also share in the burdens and expenses of the Property. Having been the sole contributor toward the maintenance of the Property, Defendant believes that the other Parties to this action should not be permitted to claim ownership in the Property. Defendant believes that her sole contributions, her parent's intent to allow her to stay in the home, and her belief that her parents would not want the other parties to force a sale of the only home that Defendant has evidences her hostile possession of the Property as her own. Her possession is to the hostile exclusion of any other heir who has failed to contribute to the Property in anyway since 2003.

15. Provide addresses for any and all real properties owned by you, regardless of location, and identify the primary use of each (i.e., primary residence, rental property, etc.).

RESPONSE:

The Property that is the subject of this action is owned by Defendant and serves as her primary residence. Additionally, Defendant believes she has at least a partial interest in the following properties:

- Unit 2002, Cosa Blanca West 2735 S. W. 35th Place, Gainesville, FL 33108
(uninhabited)
- Vacant, undeveloped lot in Port Charlotte, FL
- A 1/5 interest in a vacant lot located at 7750 S.W. 78th Street, Miami, FL 33143

16. Identify any addresses where you have resided for a period of longer than 48 hours since 2003.

RESPONSE:

Defendant states that she has not resided at any other address for longer than a 48 hour period since 2003.

Keith L. Tolbert v. Carolyn Tolbert-Smith, et al.
Case No. 2021-CP-10-04058
DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

way toward the maintenance, repairs, improvement, or upkeep of the Property. No contributions have been made toward property taxes or insurance. Further, no other Party contributed economically or otherwise to the care of Helen and Fred Tolbert in their final years, leaving the burden to Defendant. Had Defendant not provided care for her parents at her own expense, Defendant believes that the Property would have needed to be sold to pay for assisted living and or nursing home care.

14. State the specific legal and factual basis for you Adverse Possession counterclaim, and specifically the legal and factual basis for the allegations contained in Paragraph 40 of your Answer and Counterclaim.

RESPONSE:

The legal basis for Defendant's adverse possession claim is the established case law of this State, as well as S.C. Code sec 15-67-210, et seq. Defendant states that she has continuously lived in the Property since 1995, and took exclusive possession of the Property after the passing of Helen in 2003. Since that time, Defendant has paid all taxes and made all contributions to any maintenance, repairs, or improvements made to the Property. She has received no financial assistance from any of the other Parties to this action. Her possession and control of the Property has been actual, continuous, and exclusive, as well as open and notorious. All Parties to this action were aware of Defendant's occupation of the Property. Defendant's name has appeared in the public records with he assessor and treasurer's office as the owner of the Property for at least 10 years. As to Defendant's possession being hostile, she has continuously understood for at least 10 years that it was her parents' desire that she remain in the house. This belief was supported by conversations with Sara and Blanton. Defendant has also consistently maintained that the phrase "share and share alike" found in Helen's Will indicates her mother's intent that the

Defendant
Mother's intention as to her will for her property

Mother's intention for subject property etc

partition by allotment claim, if the property is sold Defendant believes that she would be damaged by any amount that is paid to the other heirs.

Defendant is currently damaged in an amount to be determined by the Court as to those expenses associated with the Property. Defendant believes that if the other parties are found to have an interest in the Property, then she is damaged by an amount that would equal their proportionate share of the cost of maintenance, improvements, repairs, taxes, insurance premiums and other amounts determined to be common expenses. Defendant also believes that she made significant financial sacrifices and contributions for the care of the Helen and Fred Tolbert, which allowed for the Property at issue to be preserved as part of her parents' estate.

Defendant also maintains that she is damaged by being forced to incur legal fees and costs to defend this action.

12. Please identify any and all time periods that you resided at the Property, including your age at the time and length of residency.

RESPONSE:

Defendant resided at the property herein name during the following time periods:

- May 1963 through August 1961 when Defendant was approximately 19-20 years old
- Every summer from May – August between 1970-2022. Approx. 40-84 years old
- August 1985-1987; Approx. 50-52 years old
- Continuously from August 1995-Present; Approx. 60-84 years old

13. Describe any pecuniary contributions made by any of the other Defendants toward the Property that you are aware of, which may include, but is not necessarily limited to improvements, maintenance, repairs, taxes, insurance, etc.

RESPONSE:

Defendant states that none of the other Defendants, nor the Plaintiff, have made any pecuniary contributions toward the Property. They have not paid or contributed in any

7. Set forth an itemized list of any repairs made to the Property by you, or at your request, since 2015, including the approximate date the repair was made, a description of the repair, and the cost incurred by you in making such repair, if any.

RESPONSE:

Please see Defendant's response to Interrogatory #6.

8. Describe in detail any and all contributions you have made to the routine maintenance of the Property since 2015, including a description, approximate dates made, and any cost incurred by you in said maintenance.

RESPONSE:

Please see Defendant's response to Interrogatory #6.

9. Set forth a list of the dates and amounts of payments made by you toward the property taxes and/or insurance premiums related to the Property.

RESPONSE:

All property taxes have been made by the Defendant, Carolyn Tolbert-Smith from 2003-2021. Please see below a list of the amounts paid. Defendant is trying to locate additional tax records for certain years to determine the amount of payment made and will supplement this response accordingly if/when additional information is obtained.

Bill Year	Amount Owed (-064)	Amount Owed (-065)	Date Paid	Amount Paid
2004	\$123.14	\$1,093.71	11/14/2004	\$1,216.85
2005	\$351.17		10/14/2005	\$351.17
2011	\$360.85	\$963.31	3/28/12 & 6/22/2012	\$1,324.16
2012	\$221.55	\$2,676.18	1/25/2013	\$3,058.41
2013	\$636.19	\$2,235.81	1/10/2014	\$2,872.00
2014	\$677.01	\$2,325.12	1/15/2015	\$3,002.13
2015	\$872.53	\$2,195.30	2/16/2016	\$3,067.83
2016	\$828.63	\$2,080.92	12/16/16 & 1/26/2017	\$2,961.36
2017	\$859.76	\$2,155.86	11/27/2017 & 1/24/18	\$3,015.62
2018	\$344.54	\$2,349.44	4/3/2019	\$2,693.98
2018		\$182.85	4/3/2019	\$182.85
2019	\$360.04	\$2,433.23	7/2/2020	\$2,793.27
2019	\$34.50	\$182.85	7/21/2020	\$217.35

Defendant has also had various telephone conversations with Keith, Charles, and Betty about the Property in the past, though she cannot recall specific dates. She recalls discussing with Keith and Charles paying each heir \$50,000.00 to purchase their claimed interest in the Property. Defendant states that she made the offer to try to avoid any lawsuit, but that she did not receive a counteroffer in return.

Defendant recalls having telephone conversations with Sara about the Property and whether probating Helen's estate was needed shortly after Helen's death and again about eight years later. Around 2012, Defendant recalls having a telephone conversation with Sara about the Property during which Sara suggested that the Property should be sold. She also recalls talking with Sara shortly after Helen's death around 2003 or 2004, and during that conversation Sara informed defendant that she spoke with the other living heirs at that time and they conformed that Helen would have wanted Defendant to stay in the Property for as long as she wanted.

19. Have you, or anyone at your request and/or on your behalf, taken out any mortgage against the Property, or encumbered the Property in anyway, including but not limited to liens and lines of credit? If so, please provide the dates that such encumbrance was recorded against the Property and for what amount.

RESPONSE:

No.

20. Has the Property been damaged during your time residing on the Property? If so, please provide the dates of such damage and any resulting repairs or remedial work performed.

RESPONSE:

Defendant states that careless tree trimming as well as storms resulted in roof damage that allowed water intrusion to the sun room. The carpets needed to be removed, and Defendant believes there may be ongoing mold and/or mildew damage. There has also

Four A²

Keith I. Tolbert v. Carolyn Tolbert-Smith, et al.

Case No. 2021-CP-10-04058

DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

been damage to the perimeter chain link fence due to falling limbs when the power company was performing tree trimming. A plumbing leak has caused damage to part of the ceiling on the first floor. Upon information and belief, Defendant also believes that the Property needs overall wiring, plumbing and roof maintenance and repairs, and would consider the current state as "damaged" through natural wear and tear. Defendant has not had a professional inspect the foundation, but she has concerns that it may be damaged in certain places.

21. State with particularity the reasons why there was a delay in the filing and settlement of the Estate of Helen G. Tolbert, to include the recording of the relevant Deed of Distribution at issue in this case.

RESPONSE:

Defendant objects to this interrogatory on the grounds that it seeks information not relevant to the subject matter of this lawsuit and not calculated to lead to the discovery of admissible evidence. Without waiving this or any applicable objection and reserving all rights, Defendant has prepared a handwritten response that is being produced as part of Defendant's Responses to Plaintiff's First Set of Interrogatories. Please see document Bates stamped "Carolyn Tolbert-Smith 360-361."

22. Identify any rent payments made by you or to you related to the Property. In answering this Interrogatory, please identify by name and contact information the individual and/or entity making or receiving the rent payments.

RESPONSE:

Defendant states that she has made no rental payments related to the Property, nor has she received any rental payments from any other person or entity.

23. State with particularity any attempts, proposals and/or offers to make any rent payments to the heirs to the Property while you have resided thereon.

Exhibit A3

A3

Oxk
276 PG028

Durable P.O.A.

Appellant was put in charge of my parents and their property - Cjs

BK L 276PG028

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

DURABLE POWER OF ATTORNEY

They invited me to remain in charge - Cjs

KNOW ALL MEN BY THESE PRESENTS, that I, HELEN GRANT TOLBERT, of Mount Pleasant, South Carolina, have constituted, made and appointed and by these presents do constitute, make and appoint CAROLYN T. SMITH, my true and lawful attorney for me and in my name and stead, giving and granting unto CAROLYN T. SMITH, my said attorneys, for these presents full and whole power, strength and authority, in and about the premises, to be my true and lawful attorney in fact, for me and in my name, place and stead, and on my behalf, and for my use and benefit, as follows:

(a) To enter upon and take possession of any lands, tenements and hereditaments that may belong to me, or to the possession of which I may be entitled;

(b) To ask, collect and receive any rents, profits, issues or income of any and all of such lands, tenements and hereditaments, or of any part or parts thereof;

(c) To pay any and all taxes, charges and assessments that may be levied, assessed or imposed upon any of my lands, buildings, tenements or other structures;

(d) To make, execute and deliver and deed, mortgage or lease, whether with or without covenants and warranties, in respect of any such lands, tenements and hereditaments, or of any part or parts thereof, and to manage any of such lands, and to manage, repairs, rebuild or reconstruct any buildings, houses or other structures, or any part or parts thereof, that may now or hereafter be erected upon any such lands;

(e) To extend, renew, replace or increase any mortgage or mortgages now or hereafter affecting any of my lands, tenements and hereditaments and/or any personal property belonging to me, and, for any of such purposes, to sign, seal, acknowledge and deliver any bond or bonds, or to make, sign and deliver any note or notes, and any extension, renewal, consolidation or apportionment, agreement or agreements, or any other instrument, whether sealed or unsealed, that may be useful or necessary to accomplish any of the foregoing purposes;

(f) To obtain insurance of any kind, nature or description whatsoever, on any of my lands, tenements and hereditaments and/or in connection with the management, use or operation thereof and/or on any personal property belonging to me and/or in respect of the rents, issues and profits arising therefrom, and to make, execute and file proof or proofs of all loss or losses sustained or

H.G.T.
H.G.T.

From about 1995 to 2003

Copy

Letter to my Capar
attorney

Exhibit B

Carolyn Tolbert Smith
338 Fifth Avenue
Mt. Pleasant, SC 29464
11/30/2022

Attorney Melena Dunwoodie
4000 Faber Place Drive
Ste. 450
North Char., SC 29405

3/16/23
Note, please
Counsel no
glected to
informing

Dear Attorney Dunwoodie:

Appellant,
timely so that
she would not appeal.

I, Carolyn T. Smith respectfully request
that you address, on my behalf, the follow-
ing:

1. I am told by Mr. Snipe(s) that no subpoena has been served on Mr. Henry A. Palmer. I have, though, given you his address. He is the best source and easier way to obtain proof of the six thousand dollar roas added to our dwelling at the address written above.
2. I am also told that State Farm was served a subpoena to produce the ins. proof that I submitted to you. Please address nos 1+2
3. Last week, in and about Nov. 25th, 2022, a letter from the Court House, 100 Broad St., confirmation per the entry of judgment regarding the summary judgment based on the Hearing held 09/21/2022.

03/16/23 * Appellant was not told of getting an
I must appeal said judgment in as much as Extension

Counsel 11/30/22

I was egregiously disab
-> Vantag ect.

All material facts never surfaced but must be presented at the appeal level. I see this step as the only way to prevail for my children and me in this matter. We have no need to be burdened with the huge, gigantic debt that we face when we'd be or when we are made to buy out the interest of four (4) heirs. Plaintiff's appraisers are paid to inflate the value of property that the Defendant at age 85 yrs. is already burdened financially with recent need for repairs. We have already, my children especially, suffered priceless loss(es) by lovingly, compassionately, devotedly uprooting ourselves from our familiar easy lifestyles. We have done the right thing by mother and daddy. Said sacrifices

however, the real "SWEAT, BLOOD AND TEARS" are ceaselessly ignored. This cannot be. There is NO SWEAT in paying monetarily for anything. We paid with our hearts, muscles, tears, blood... in other words with ourselves fully. "Whatsoever thing is true, honest, noble, true, lovely, of good report, think on these things." The Tri-une-God said, through His ordained writer, "Be ye doers of the word."

* I have the valid and Solemn need to preserve mother and daddy property, lot + dwelling place bought with a loving mammoth price.

* I mother's will she made not the slightest indication that she was agreeing to the sale

of her property and daddy's. Fact is that we could have agreed to add to the present dwelling, rent the space and provide joint income forever which I suggested about yr. 2000. Sara Jo Said No!

Yours truly
Carolyn F. Smith

Handwritten scribbles consisting of several lines and a small hook-like mark.

03/14/2023

Exhibit C

Memo - Per egregious act by Respondent

To: Members of The South Carolina

Court of Appeals

From: Appellant, Carolyn Tolbert Smith

Re: The three abnormal numbers of file

ings, regarding Appellant's Motion To

Return To The Motion

Appellant, C.T. Smith is now speaking with an

attorney, hopeful am I that this attorney will

represent me. As I have explained in my Mo-

tions to Return To The Motion, I told said

Attorney of the egregious act of Respondents,

They dated their Motion to Dismiss^(w) Prejudice

my case, Feb. 10, 2023, fourteen days before

deadline to respond to said Motion, which Ap-

pellant learned about from Ms. Kateland inco-

identally because I, Appellant called Ms. Kateland to

03/14/2023

inquire about any activity in/on my
Case; (Then) Kateland told me of Respondent's
Motion to Dismiss my appeal with prejudice
Hence three filings, With no written notice
from Respondent and not having any guide as to
accusations or any specifics and trying des-
perately not to have my valid, winnable case
dismissed, as I waited for the required, timely
Notice from Respondents, I was forced to respond
blindly, Four days, before the Feb. 21, 2023 dead-
line Respondent's Notice arrived, requiring a
major rush and costly overnight mailing, to make
the Feb 21, 2023 deadline in four days. This egre-
gious, deliberate, desperate move to avoid mov-
ing to the appeal level is unforgivable. The
attorney advising me, feels that knowledge
of this information might have Respondents start ^{over}

2

Exhibit "C"

*Tel. 1-843-216-6960 Carolyn Tolbert Smith
338 Fifth Ave
C1-786-325-2704 Mt. Pleasant, SC 29464
04/16/2022

Exhibit D

Attorney Melena Dinwoodie
4000 Faber Place Drive
Ste. 550
North Chas, SC 29405

To: The Court of Appeals for SC:

Please read this letter and the one next herein re 04/16/22 and 11/30/2

Dear Atty. Dinwoodie:

I trust that you and yours are well and are experiencing a beautiful and healthy Passover, Easter season. Let me thank you for your work on my behalf, in the Matter of the distribution settlement among all concerned. I appreciate your expertise so desperately necessary to prevail in the dispute. I have a request of you. In our fiduciary relation, my acute need is to have you share with me, by reg mail or I could receive a packet that you leave at the front desk, containing responses and all input by Dr Betty J. T. Jones, Keith La Tolbert and Charles Leon McMillian AKA Charles Tolbert. My part in this battle against the foe is to remain privy of their weaponry and to counter with more massive weaponry an eye or four eyes on prevailing. Presently I'm in-the-dark and must be enlightened. After reading their input, responses and refuting as need be, I'd be prepared to discuss the matter with you.

I anxiously await your response.

Respectfully,
Carolyn Tolbert Smith

I'm attempting to save time + cut costs

4/16/2022

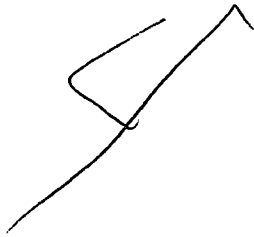
FIVE STAR

FIVE STAR

FIVE STAR

FIVE STAR

Exhibit "D"



Repeal to the motion

Exhibits all E



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

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~~January 10, 2023~~

Carolyn Tolbert Smith
338 5th Avenue
Mount Pleasant SC 29464

Re: Keith Tolbert v. Carolyn Smith
Appellate Case No. 2022-001815

Keith L. Tolbert, Respondent,

v.

Carolyn Tolbert Smith, Charles Tolbert, Betty Jean Tolbert Jones, Sara Jo Tolbert Latten, and Estate of Charla Tolbert McMillian, Defendants,

Of whom Carolyn Tolbert Smith is the Appellant,

and

Charles Tolbert, Betty Jean Tolbert Jones, Sara Jo Tolbert Latten, and Estate of Charla Tolbert McMillian are the Respondents.

*Please find on file with the SC Court of Appeals:
Second Ans. etc*

Return to the motion

*Second ans. First ans pre-
pared blindly. Respondents motions are
mailed so that if Appellant had only four days
to respond. etc*

Copy for
the said

1

Motion To Return To The Motion

Final of
Motion here

Comes now most humbly, in my strong de-
 fence against Respondents' Motion To Dis-
 miss, Appellant, Carolyn Tolbert Smith, Outtin-
 ing, stating the facts, issues and reasons that
 Respondents' motion To Dismiss with preju-
 dice (Appellant's appeal), in Case No. 2022-001815
 is premature and without merit.

Respondents' attorney states the following:

In Henning v Kaye ... the appelant's initial
 brief failed to comply with Rule 207

SCACR and that Designation of Matter
 to be included in the Record on Appeal was
 insufficient under Rule 208 SCACR.

UN 2022-001815's Motion To Return To The Motion Postmarked Mailed Feb. 21, 2023 overnight

2

The Supreme Court of South Carolina found:
Counsel is advised that the South Carolina
Appellate Court Rules are not mere techni-
calities but . . . It is incumbent on Counsel
to provide material that complies with the
Rules and facilitates appellate review.

Please be assured that Appellant respects
the Rules of the South Carolina Appellate Court. Be-
ing not Counsel and without Counsel appellant
struggles to get help in finding & learning the
Rules and complying unhesitatingly. Due to
my disadvantage, being temporarily no long-
er with counsel, I initially begged and pray-
ed the Court's indulgence in the matter.

• Contrary to Respondents' attorneys' accusa-
tions

which appellant stringently denies, Appellant

filed in a timely manner my Motion For Ex-

tension Of Time, my Notice Of Appeal and my

Appeal and did so based on my time of re-

ceiving notice, by U.S. Mail that arrived ~~off~~
ten

later than the inside date of its existence ^{is}
the mailing

• Shows. Mail is late necessarily when one's

mail reaches the wrong mail box. It happens

no fault of the client or anyone but the postman.

• With regard to deficiencies in the initial

brief, in the, Designation of Matter, to be

included in the Record on Appeal, the Su-

preme Court granted the ^{an} appellant leave to cor-

u
rect the violations within a number of days

(15). Appellant, Carolyn T. Smith, requests

that the South Carolina Court of Appeals allow

me to correct the deficiencies named above

in a matter of days. The Supreme Court of

South Carolina ruled as follows and appellant

quotes; "Although this Court would be com-

pletely justified in dismissing this appeal

based on appellant's numerous violations

of the Rules, we decline to do so and

deny the motion to dismiss as to the Hen-

ning's. Henning 307 SC 436, 437-438, 415

S.E. 2d at 704. The numerous violations in the

Henning v Kaye matter are non-specified as minor nor

major nor egregious, neither can appellants

Rule^{per} deficiencies be so described. In addition
appellant corrects deficiencies as required.

Thus far there have been two (2).

The South Carolina Supreme Court declined to
dismiss the^{any} appellants' appeal and denied the
Motion To Dismiss. I appellant Carolyn T. Smith
prays and begs the South Carolina Court of
Appeals, to decline in^{per} appellants' present appeal.

Decline to dismiss appellant Carolyn T. Smith's
Appeal and deny the Motion to Dismiss.

Appellants' first response to Respondents'
Motion To Dismiss, appellant responded blind-
ly^{earlier} not having received Respondents' written

6
Motion with its specific claims. This second response allows appellant to address the visible specifics. The written motion with visible, specific claims has the date of completion as February 9, 2023. Appellant received the same on the 17th/18th of February 2023.

Appellant is still working to find counsel willing to take on the unfinished work of former counsel. Issues ^{@ Also, Unmeritorious} - Drastic Summary Judgment ^{more.}

Exhibit - A }
Exhibit - 1 } Included herein.
Exhibit - 2 }
Exhibit - B }

• Other issues include the fact that I, appellant would have the South Carolina Court of Appeals recognize the fact that appellant, referencing case law shall in the Court of Appeals show proof of having satisfied Six (6), all six elements required to be entitled to Adverse Possession.

• At the Circuit court level none of said elements not one was heard.

The summary judgment matter was heard first and agreed upon as acceptable and correct.

Attorney for appellant did not argue or disagree.

Appellant lived on the subject property twenty-eight years, 8 years as primary caregiver, nineteen exclusively.

Certificate of Service

The Clerk of The Court
100 Broad Street
Chas, SC 29401

Dr. Betty Jean T. Jones
1311 Delaware Ave. S.W.
Apt. South 843
Washington, DC 20024

Attorney A. Taylor Silver
P. O. Box 1665
Georgetown, S.C. 29442

Attorney William Kalivas
7455 Cross Country Road
Ste. 1
North Chasen, SC 29418

Carolyn Talber Smith
338 Fifth Avenue
Mt. Pleasant, SC 29464

Attorney Ashley Andrews
544 Savannah Hwy.
Chas., SC 29407

1-843-216-6960
Carolyn T. Smith, Pro Se

Pro Se

This 21st Day of
February, 2023

Exhibit F (D)

COUNTS & HUGER, LLC
ATTORNEYS AT LAW

F (D)

Attorneys
George E. Counts (SC, GA)
Kelvin M. Huger (SC, NY)

COUNTS & HUGER, LLC
27 Gamecock Avenue, Suite 200
Post Office Box 80399 (29416)
Charleston, SC 29407
Tel: (843) 573-0143
Fax: (843) 573-0153

FILED

11 SEP 28 AM 11:59

PROBATE COURT
CHARLESTON COUNTY

Proof against untruths at the Circuit Courts level of

September 26, 2011

Carolyn Tolbert Smith
338 5th Street
Mt. Pleasant, SC, 29464

Blanton William Tolbert
202 St. James Ave., Apt. # 9-D
Goose Creek, Ave. 29445

Dr. Betty Jean Tolbert Jones
P.O. Box 6429
Charlottesville, VA 22906-6429

Sara Jo Tolbert Latten
7095 Hollywood Blvd.
Apt. # 597
Hollywood, CA 90028

Charles Tolbert
115 Franklin Tpk, No. 259
Mahwah, NJ 07430

Charla McMillian
1518 Encinal Avenue
Alameda, CA 94501

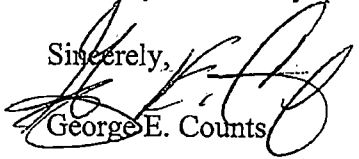
RE: Estate of Helen Alice Grant Tolbert
Case No.: 10-ES-10-01356

I am not sure of the paragraph below, Mistake?

Dear Heirs:

As you may be aware, Probate of the Estate of the Late your husband and father, Lawrence Morrison is nearly complete. For your review, enclosed please find your Notice of Right to Demand Hearing ("Notice") and your Receipt and Release ("Release"); Proposal For Distribution, Final Accounting, and Petition for Discharge. The Notice provides you with an opportunity to request a Hearing, if you so desire. The Release informs you of your distribution from the Estate. Please review the Notice and the Release. If you so desire please follow the instructions in the Notice to request a hearing. Alternatively, if you do not desire to request a Hearing, please sign the Release in the presence of a witness and return it to my office. The Petition for Discharge request that the Probate Court Review all the documents and close the Estate. The only document that needs to be returned is the Receipt and Release. The other documents are for your records.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

George E. Counts

GEC/pw

Enclosures: As Stated

Copys
F2
Deed of Distribution

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO.: 2021-CP-10-

Keith L. Tolbert
Plaintiff,

vs.

Carolyn Tolbert Smith, Charles Tolbert, Betty
Jean Tolbert Jones, Sara Jo Tolbert Latten,
and Estate of Charla Tolbert McMillian,
Defendants.

Exhibit F2

[Handwritten signature]

AFFIDAVIT OF
JESSICA WENTWORTH GRASSI 03/17/2023

Below please find who
did a corrective deed
the subject matter yet at circuit
court hearing the accused me *[initials]*

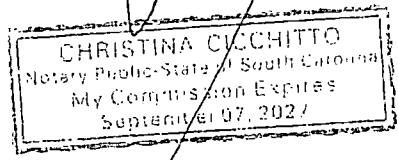
NOW COMES the affiant and says:

1. That I represented the Personal Representative, Keith L. Tolbert, in the Estate of Blanton William Tolbert, case no.(s): 2015-ES-08-907-3 and 2017-ES-10-01149.
2. That I prepared and recorded the Deeds of Distribution attached hereto as Exhibits A and B, respectively.
3. That Deeds of Distribution referenced in the preceding paragraph contain an error in the decedent's percentage interest in the respective properties based on incomplete source deed information received from the title abstractor.
4. That, therefore, the percentage interested deeded to Keith L. Tolbert in the Deeds of Distribution are not accurate.
5. That, upon review of all relevant source deeds, the true and accurate percentage interests for each property are as stated in the Complaint.

FURTHER YOUR AFFIANT SAYETH NOT.

SWORN to before me this
27th day of August, 2021
[Signature]
Notary Public for South Carolina,
My Commission expires: 9/7/27

[Signature]
Jessica Wentworth Grassi
She did the corrective deed



Carolyn T. Smith points out and proves *in current of* unbrother allowed
Charges to me of 'Needs of Dist'

F 3

mother, Helen Alice Grant Tolbert resided at 338 5th Avenue and owned an interest in both Property 1 and Property 2 until her death on December 25, 2003. Further, Defendant Smith, as Personal Representative of the Estate of Helen Alice Grant Tolbert, executed a corrective Deed of Distribution on January 17, 2013 confirming title in her name and in the names of the other parties to the within action. The execution of the 2013 Corrective Deed of Distribution defeats a claim of ouster, which is a necessary element to Defendant's counterclaim for adverse possession. There is no genuine issue as to any material fact and Defendant Charles Tolbert is entitled to judgment as a matter of law.

IT IS THEREFORE, ORDERED that Defendant Charles Tolbert's Motion for Summary Judgment as to Defendant Carolyn Tolbert Smith's counterclaim for adverse possession is granted.

IT IS FURTHER ORDERED that this court shall retain jurisdiction over the partition action which is still pending.

IT IS SO ORDERED!

Attorneys executed this corrective deed Bates Services be Respondents by Plaintiff Respondents

hence a claim of Quiet Title

Too hasty, Too cut-and-dry

In this court Plaintiffs will again be given their way meaning the result will be a travesty of justice and egregious

Note I had to do nothing any of called with sign so a correct Deed

ELECTRONICALLY FILED - 2022 NOV 08 2:58 PM - CHARLESTON - COMMON PLEAS - CASE#2021CP1004058



Note, please; 1st attempt + responsibly

The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK
V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

Exhibit G Page

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

February 15, 2023
~~January 15, 2023~~

*NO to, please
Below find Appellants
2 response in the dark, per
Respondents has not noticed Appellant
of Motion to
Dismiss to
Prejudice - I heard
Said accidentally by miss
Katelyn
whom I
called to
movement
in my case*

Carolyn Tolbert Smith
338 5th Avenue
Mount Pleasant SC 29464

Re: Keith Tolbert v. Carolyn Smith
Appellate Case No. 2022-001815

*Supplemental
reasons for rein-
stating Case 2022
001815 this
packet*

Keith L. Tolbert, Respondent,

v.

Carolyn Tolbert Smith, Charles Tolbert, Betty Jean Tolbert Jones, Sara Jo Tolbert Latten, and Estate of Charla Tolbert McMillian, Defendants,

Of whom Carolyn Tolbert Smith is the Appellant,

and

Charles Tolbert, Betty Jean Tolbert Jones, Sara Jo Tolbert Latten, and Estate of Charla Tolbert McMillian are the Respondents.

First Response without Respondents Motion	Return To The Motion And Motion for Extension of Time
---	---

To Dismiss On February 14, 2023, it was brought to my at- which has fension that Respondent in Case 2022-001815 been sup- plied to me, Appellant, Carolyn T. Smith 1

filed a motion to Dismiss Appellant's Appeal in the case aforesaid. Further I was told that I had until February 21, 2023 to respond to said Motion which gave me seven (7) days to respond. Still further Appellant has not been noticed by Counsel for the Respondent neither has the Appellant received correspondence from the South Carolina Court of Appeals regarding a Motion to Dismiss. Though the Appellant can guess or assume what appears in said Motion, Appellant is at a decided disadvantage in the matter. I'd be "walking in the dark." Notwithstanding I, the Appellant is willing to make statements in support of my appeal as I await a copy of Respondent's Motion to Dismiss. At this time, the Appellant requests an extension of time to respond, addressing any specifics in the Motion to Dismiss.

My Motion, Return To The Motion comes with the following support as to why Appellant's Appeal should not be dismissed:

@@ It would be an egregious travesty of Justice in our Country which pledges Liberty and Justice For All. This includes widows who may be in the Courts as a Nuisance as was the widow biblically. She like me had to return to the Court unable to find Counsel. She returned many times simply seeking justice.

I, the Appellant is the same. Temporarily I am without Counsel, without the skills of one trained in law and without a legal secretary ie one skilled in legal typing.

① The Circuit Court in its Order [Judgment] erred in multiple areas as follows:

① In handing down and granting Charles Tolbert summary judgment, ② in hearing first, arguments (flawed) pertaining to reasons for granting summary judgment; ③ in, hence, discounting all genuine issues as to material facts; ④ in ignoring warnings per the drastic remedy that summary judgment is and why caution should be taken before it is ever invoked; ⑤ in not therefore, allowing trial by jury, if in order; ⑥ in its decision to add a sixth element to the five (5) elements required by South Carolina Law to be satisfied to claim, Adverse Possession, which was and is Appellant's Counterclaim to Charles Tolbert's drastic claim of Quiet Title with Partition which, if granted would rob me the Appellant of the sole roof over my head at age eighty-five. Appellant was not afforded the opportunity to argue the genuine issues as to material fact which had focus on Appellant's having resided always in the property lot, 326 and on the grounds, lot 327 for 28 twenty eight yrs. ie. 8³, Caring for Ma and Pa, Fred + Helen Tolbert, through 2003, December and thereafter ie 2003-2023 exclusive.

ly, consistently, giving tender, loving, devoted care to our parents who gave so much of themselves to five of us. One only was deceased. The only grandchildren who came were Appellant's children; some uprooted from the college studies in their home state; One Counsel for Respondents only argument was that of form only. He did not approve of my handwritten responses. The Appellant apologizes and now has a friend in the legal field assisting me, the Appellant in my search for a secretary that is versed in the ways of typing prescribed by SC law;

(b) The Quiet Title Claim strictly counters the decedent, my mother's fervent desires expressed in her Last Will And Testament i.e. << Share And Share Alike >> which does not reference selling her property or burdening any of her children with taking on the load and care of putting the subject property under heavy mortgage in order to secure thousands of dollars to buy the interest of those who care nothing absolutely for "Preservation" of a phenomenal legacy of parents who burned out and died, to leave us heirs to preserve the legacy not erase them, their efforts, their worthy legacy as great contributors to the state of SC, to their country while touching those who spread mother and daddy's gifts around the world; Waste to beat the nearly twenty years of ownership of said properties prompted the Cir-

- Circuit Court to err in its haste in this total matter. This left me finding imbalance in the scales of justice. Appellant seeks justice as the one child with the aid of her child sustained the decent and her husband substantially long before and during the years 1995-2003; maintained the property and saved said property from loss because of payments to assisted living or unpaid taxes.

Certificate of Service

The Clerk of The Court
100 Broad Street
Char., SC 2940

SC Court of Appeals
1220 Senate St
Columbia, SC 29201

Atty. Alwyn T. Silver
P.O. Box 16103 D Queen St.
Georgetown, SC 29440

Beth J. Tulbert Jones
1311 Delaware Ave., S.W.
Apt. South 843
Washington, DC 20024

Atty. Ashley Andrews
544 Savannah Hwy
Char., SC 29407

Carolyn Tolbert Smith
338 Fifth Avenue
Mt. Pleasant, SC 29464
1-843-216-6960

Atty. William Kalivas
7455 Cross County Rd.
Ste. 1
North Char., SC 29418

Pro Se

Exhibit D

Charleston > excellence is our standard
County SCHOOL DISTRICT

Copy 5

Exhibit H

March 13, 2023

Carolyn Smith

Dear Ms. Smith:

Human Resources
Department

This is verification of your employment from 09/22/1995 through 09/30/2013. Your address of record for this timeframe was 338 Fifth Avenue, Mt. Pleasant, SC 29464.

Donald R. Kennedy, Sr.
Superintendent of Schools

Sincerely,

William C. Briggman
Chief Human Resources Officer

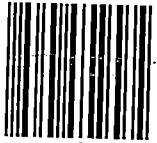
Kathleen Magliacane

Kathleen Magliacane
Director of Teacher Recruitment & Staffing

Please note: I await Kelly Services statement for my continued employment same address as above is the subject property. Kelly substituted for the Char Co District teacher service, 2014-2020-2023
CJS

Exhibit D²

Family of the Late Corporal W.L. Smith
338 Fifth Ave.
Mt. Pleasant, SC 29464

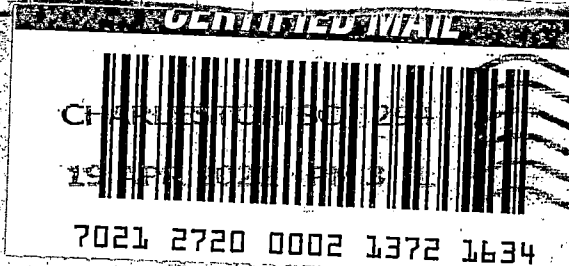


29405

U.S. POSTAGE PAID
FCM LETTER
MOUNT PLEASANT, SC
29464
APR 13 22
AMOUNT

\$3.75

R2305K140928-65



Sub

Atty. Melena Pinwoodie
4000 Faber Place Drive
Ste 450
North Charleston, SC 29405

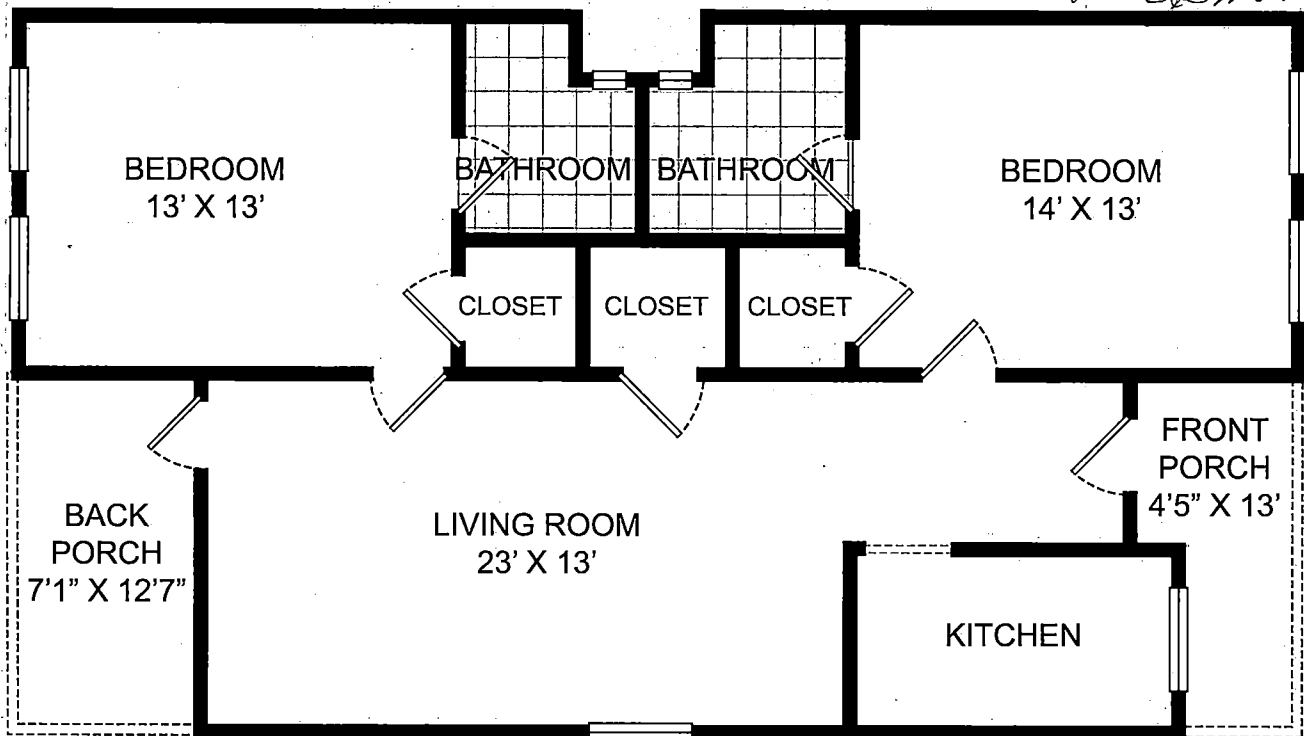
29405-000000



THE VILLA - 2 BED, 2 BATH

Exhibit H

Proof of Appellants Care for the decedent and her husband saved the subject Property that estranged relative now quarrel over - out of greed they never ever contributed, putting anything in but now reach to take over and take all. Humbley, C Smith



1,400 Sq. Ft. Hundreds of thousands of dollars saved by Appellants efforts eight plus years ago

All plans and dimensions are approximate.

THE PALMS OF MT. PLEASANT



937 Bowman Road | Mount Pleasant, SC 29464 | 843-884-6949 | www.ThePalmsOfMtPleasant.com

©2021 Five Star Senior Living



THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell R. Scarborough, Circuit Court Judge

Appellate Case No. 2022-001815

KEITH L. TOLBERT, RESPONDENT

v.

CAROLYN TOLBERT SMITH, CHARLES TOLBERT, BETTY JEAN TOLBERT JONES, SARA JO TOLBERT LATTEN, AND ESTATE OF CHARLA TOLBERT MCMILLIAN, DEFENDANTS,

OF WHOM CAROLYN TOLBERT SMITH IS THE APPELLANT,

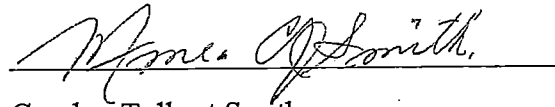
AND

CHARLES TOLBERT, BETTY JEAN TOLBERT JONES, SARA JO TOLBERT LATTEN, AND ESTATE OF CHARLA TOLBERT MCMILLIAN ARE THE RESPONDENTS.

PROOF OF SERVICE

*Per # 7 Rule
Certificate
of
Service*

I certify that I have served the Notice of Appeal and Motion for Extension on Alwyn Taylor Silver, Esq., William K. Kalivas, Esq., Taylor Silver, Esq., Ashley G. Andrews, Esq., and Betty Jean Tolbert Jones by depositing a copy of the Notice of Appeal and Motion for Extension with sufficient postage to her attorney and all parties of record on January 2, 2023.



Carolyn Tolbert Smith
338 Fifth Ave.
Mt. Pleasant, South Carolina 29464
(843) 216-6960

DATED: February 3, 2023

Charleston, South Carolina

mine

Certificate of Service

I hereby certify that a true and correct copy of the foregoing is being sent, furnished by U.S. Mail to the Clerk of Court, William K. Kalivas and Attorney Ashley Andrews.

Julie Armstrong
Clerk of Court
100 Broad Street
Ste. 106?
Charleston, SC 29401-2258

M. Smith
Pro Se

Attorney William Kalivas
7455 Cross County Rd
Ste. 1
North Chas., SC 29418

Ashley Andrews
544 Savannah Hwy
Charleston, SC 29407

Dr. Betty Jean Tolbert Jones
1311 Delaware Ave. South
Apt South 843
Washington, DC 20024

Attorney Alwyn Taylor Silver
P.O. Box 1665
Georgetown, SC 29442

Clerk of the Ct
100 Broad St #9
401

SENDER, COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
1. Article Addressed to: Ashley Andrews 544 Savannah Hwy Chas., SC 29407		A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> <input checked="" type="checkbox"/> A. Williams <input type="checkbox"/> Addressee B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery Ashley Richards	
2. Article Number (Transfer from service label) 7022 2410 0001 2288 7037		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
3. Service Type <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail (over \$500)		<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
4. Article Number (Transfer from service label) 9590 9402 7967 2305 3395 81		Domestic Return Receipt	

Copy 6

Attention Mr. Tolbert
338 Fifth Avenue
Mt Pleasant, SC 29444

Carolyn Tolbert Smith
338 Fifth Avenue
Mt Pleasant, SC 29444



UNITED STATES POSTAL SERVICE **PRIORITY MAIL EXPRESS**

CUSTOMER USE ONLY

FROM (Print name) PHONE ()

*Carolyn Tolbert Smith
338 Fifth Avenue
Mt Pleasant, SC 29444*

ORIGIN (POSTAL SERVICE USE ONLY)

1-Day 2-Day Priority First Class

NO ZIP Code Scheduled Delivery Date (MM/DD/YYYY)

29404 *4/3/23* \$ *29.90*

Cost (Including postage) Scheduled Delivery Time (MM/DD/YYYY)

4/1/23 *12:00 PM* Insurance Fee \$ COO Fee \$

Time (MM/DD/YYYY) AM PM Priority First Class

3:05 AM PM Priority First Class

Special Handling Charge Signature Confirmation Fee Return Receipt Fee Delivery Point Fee

\$ \$ \$ \$ \$ \$

Weight at Post at Retail at Retail at Retail

8.1 *10* \$ *29.90*

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Address (MM/DD/YYYY) Time AM PM Priority First Class

Employee Signature

Delivery Address (MM/DD/YYYY) Time AM PM Priority First Class

Employee Signature

PEEL FROM THIS CORNER

Label 11-4, MAY 2011 PSN 7800-22-000-8008

NO POSTAGE NEEDED IF MAILED IN THE UNITED STATES
\$29.90
R02027151430-23