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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

THE HONORABLE MAITE MURPHY
CASE NUMBER: 2020-CP-07-00829
APPELLATE CASE NUMBER: 2023-001278

CAROL JENKINS JACKSON AND
JUDY SHARON JENKINS WATKINS.....Appellants.

v.

MICHAEL F. RIVERS, R.M. LAPP, TRUSTEE FOR THE ST. HELENA ASSETT TRUST, HEIRS OF HARRISON RIVERS, HEIRS OF OPHELIA RIVERS, HEIRS OF HAROLD W. RIVERS, HEIRS OF RACHAEL CHISHOLM, HEIRS OF FLORENCE C. PARKER, HEIRS AT LAW OF REUBEN M. CHISHOLM, AND ALSO VERNELL I. SMASHUM, BARBARA MCCLARKING, BEVERLY J. SCOTT, AMOS WILLIAMS, CLIFFORD HUFF, SANDRA MACK-HUFF, TRUSTEE FOR THE MARGARET LOYD SUMPTER TRUST DATED AUGUST 30, 2002, JOSEPH A. MOORE ALL OF WHOM ARE BELIEVED TO BE ADJACENT LANDOWNERS AND ARE MADE DEFENDANTS IN THIS ACTION, AND ALSO ALL OTHER PERSONS UNKNOWN HAVING OR CLAIMING TO HAVE ANY RIGHT, TITLE, ESTATE, INTEREST IN OR LIEN UPON THE REAL PROPERTY OR ANY PART THEREOF DESCRIBED IN THE COMPLAINT HEREIN, AS JOHN DOE AND MARY ROE, INCLUDING ALL PERSONS WHO MAY BE DECEASED, MINORS, IN THE MILITARY SERVICE OF THE UNITED STATES WITH THE MEANING OF TITLE 50 UNITED STATES CODE, REFERRED TO AS THE SERVICEMEMBERS CIVIL RELIEF ACT, AS AMENDED, PERSONS ON COMPOS MENTIS AND UNDER ANY OTHER DISABILITY.

OF WHOM MICHAEL F. RIVERS IS THE.....RESPONDENT.

**APPELLANTS DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

The Appellants hereby designate the following documents to be included in the Record on Appeal.

ORDERS:

1. Final Judgment Quieting Title filed May 6, 2022.
2. Order Denying Motion for Reconsideration filed July 18, 2023.

PLEADINGS:

1. Summons and Complaint filed April 6, 2020.
2. Answer of Michael Rivers filed June 4, 2020.
3. Motion for Reconsideration filed May 13, 2022.
4. Memorandum in Opposition to Motion for Reconsideration filed July 15, 2022.

TESTIMONY:

1. Curtis Inabinett testimony - Page 60 through page 82, Line 1
2. Ben Jenkins testimony (by publication of deposition) Page 87, Line 18 through Page 88, Line 19; Page 89, Line 24 through Page 93, Line 8; Page 98, Line 8 through Page 99, Line 3; Page 102, Line 19 through Page 102, Line 25; Page 104, Line 21; Page 105, Line 24 through Page 106, Line 19; Page 107, Line 11 through Page 108, Line 24; Page 110, Line 19 through Page 113, Line 12; Page 115, Line 4 through Page 118, Line 12; Page 119, Line 20 through Page 126, Line 24 through Page 127, Line 9; Page 127, Line 4 through Line 20; Page 137, Line 1 through Line 4; Page 151 Line 9 through Page 153, Line 5; Page 154, Line 14, Page 157, Line 5; Page 158, Line 5; Page 161, Line 15; Page 165, Line 17 through Line 23; Page 172, Line 1 through Line 20; Page 174 Line 5 through Line 12; Page 176, Line 19 through Page 177, Line 9; Page 178, Line 9; Page 180, Line 10; Page 182, Line 23 through Page 183, Line 5; Page 187, Line 8; Page 189, Line 5; Page 194, Line 3 through Line 8.
3. Deposition of Judy Watkins in its entirety
Testimony of Judy Watkins (trial transcript) Pages 166 through 167
4. Deposition of Michael Rivers in its entirety.
Testimony of Michael Rivers (trial transcript) Pages 193 - 245

DEEDS and PLATS:

1. Appellants' (Plaintiffs') trial exhibits as follows:
Deed – Exhibit 17
Deed – Exhibit 18
Deed – Exhibit 20
Deed – Exhibit 21
Deed and Plat – Exhibit 23
Deed of Distribution – Exhibit 25
First Mortgage Deed – Exhibit 26
Second Mortgage Deed – Exhibit 28

Master in Equity Deed – Exhibit 29
Plat – Exhibit 30
Deed – Exhibit 32
Mortgage Deed and Plat – Exhibit 33
Quitclaim Deed – Exhibit 34
Deed recorded 3/7/2014 – Exhibit 39
Deed from Lapp to Rivers – Exhibit 39
Deed Recorded 9/20/16 – Exhibit 39
Deed Recorded 8/17/2020 – Exhibit 41
Deed recorded 9/17/2001 – Exhibit 43
Plat Deated 4/22/09 – Exhibit 44
Plat – Exhibit 61
Plat – Exhibit 67
Proposed subdivision – Exhibit 69
Deposition transcript with Exhibits – Exhibit 153

2. Respondent's (Defendant's) trial exhibits:

Photograph – Exhibit 198
Photograph – Exhibit 216
Photograph – Exhibit 218
Plat – Exhibit 222

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

LAW OFFICE OF R. THAYER RIVERS, JR.

By: 

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November 16, 2023.