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**Dec 20 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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**APPEAL FROM HORRY COUNTY  
ALAN D. CLEMMONS, MASTER-IN-EQUITY**

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**Appellate Case No. 2023-001419  
Lower Court Case No. 2021-CP-26-00144**

United States of America acting through the  
Rural Housing Service or successor agency,  
United States Department of Agriculture, ..... Appellant

v.

Ginger S. Smith, As Personal Representative of  
The Estate of Yvonne Curtis Ingram, Deceased;  
Charles Curtis Ingram; Chadwick Benjamin Ingram,  
and any other Heirs-at-Law or Devisees of Yvonne Curtis Ingram,  
deceased, their heirs, Personal Representatives,  
Administrators, Successors and Assigns, and  
all other persons entitled to claim through them;  
all unknown persons with any right, title or interest  
in the property subject of this matter;  
also any persons who may be in the military service of the  
United States of America, being a class  
designated as John Doe; and any unknown minors  
or persons under a disability being a class  
designated as Richard Roe ..... Respondents

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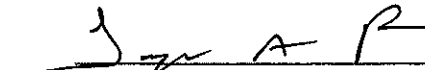
**PROOF OF SERVICE**

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I certify that I have served the Initial Brief of Appellant United States of America Acting through the Rural Housing Service or Successor Agency, United States Department Of Agriculture And Designation Of Matter to be Included on Appeal by depositing a copy of it in the United States Mail, postage prepaid on December 19, 2023, addressed to the court appointed guardian *ad litem* for Respondents all unknown persons with any right, title or interest in the property subject of this matter; also any persons who may be in the military service of the United States of America, being a class designated as John Doe; and any unknown minors or persons under a disability being a class designated as Richard Roe, Thomas D. Kilpatrick, Esq., Murphy & Kilpatrick, LLP at 2512 Devine Street, Columbia, South Carolina 29205, Respondent Ginger S. Smith, as Personal Representative of the Estate of Yvonne Curtis Ingram, deceased, at 288 W. Eleventh Street, Winnsboro, South Carolina 29180, Respondent Charles Curtis Ingram at 507 Sims Drive, Myrtle Beach, South Carolina 29577, Respondent Chadwick Benjamin Ingram at 6443 Sevierville Pike, Knoxville, Tennessee 37920, and Respondent Any other Heirs-at-Law or Devises of Yvonne Curtis Ingram, deceased, their heirs, Personal Representatives, Administrators, Successors and Assigns, and all other persons entitled to claim through them at 507 Sims Drive Myrtle Beach, South Carolina 29577.

**HARRELL, MARTIN & PEACE, P.A.**



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ATTORNEYS FOR APPELLANT

December 20, 2023  
Chapin, South Carolina

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SC Court of Appeals



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Jeremy C. Martin  
M. Alan Peace \*\*  
Taylor A. Peace  
Erik T. Norton  
Jamie Anna Weller  
George "Mick" Lusk, III

Robert W. Dibble, Jr. \*  
William Jennings (Bill) Buchanan \*  
Donald W. Tyler \*  
Thomas B. Jackson, III \*\*

\*Of Counsel  
\*\*Certified Mediator/Arbitrator

December 20, 2023

**VIA EMAIL AND REGULAR, FIRST CLASS MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**Re: United States of America, et al. v. Ginger S. Smith, et al.**  
**C/A No.: 2023-001416**  
**Our File No: 2518.28507/TAP**

Dear Ms. Kitchings:

Enclosed for filing please find the Appellant's Initial Brief and Appellant's Designation of Matter for the above referenced case.

By copy of this letter and as evidenced by the Proof of Service, these filings have been served upon counsel and the remaining Respondents in this matter.

Thank you for your time and attention in this matter. If you have any questions, please do not hesitate to contact our office at the phone number below.

Sincerely,

**HARRELL, MARTIN & PEACE, P.A.**

Tracy Slice Moore  
Paralegal to Taylor A. Peace, Esq.

/tsm  
Enclosures

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