

**FORM 14
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case No. 2021-000793

PATRICIA CLARKIN SMITH AND
WELLS FARGO BANK, NA.,
DEFENDANTS, OF WHOM
PATRICIA CLARKIN SMITH IS
THE APPELLANT,

Appellant(s),

v.

FAMILY SERVICES, INC., AS
CONSERVATOR FOR MURIEL W.
CLARKIN,

Respondent (s).

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

Appellant Patricia Clarkin Smith proposes the following to be included in the Record on Appeal:

1. Summons and Complaint filed by Respondent on October 20, 2017;
2. Lis pendens filed by Respondent on October 26, 2017;
3. Answer filed by Appellant on November 28, 2017;
4. Amended Summons and Complaint filed by Respondent on December 4, 2017;

5. Motion to Compel filed by Respondent on May 1, 2018;
6. Memorandum in Support of Plaintiff's Motion to Compel filed by Respondent on July 11, 2018;
7. Answer of Wells Fargo Bank, N.A. to Amended Complaint filed by Defendant Wells Fargo Bank, N.A., on August 15, 2018;
8. Consent Order substituting counsel for Appellant and striking Defendant Wells Fargo Bank, N.A., as a party to the action on May 21, 2019;
9. Motion to Enforce the Settlement Agreement Dated on December 12, 2018, filed by Respondent on July 10, 2019;
10. Transcript of motion hearing on August 30, 2019;
11. Order Granting Plaintiff's Motion to Disqualify Counsel and Continuing Motion to Enforce Settlement on October 10, 2019;
12. Notice of Motion and Motion for Continuance filed by Appellant on November 27, 2019;
13. Motion for Order of Reference filed by Respondent on February 11, 2020;
14. Order of Reference entered on February 12, 2020;
15. Notice of Motion and Motion to Continue filed by Appellant on February 18, 2020;
16. Memorandum in Support of the Motion to Enforce the Settlement Agreement Dated on December 12, 2018, filed by Respondent on June 23, 2020;
17. Decision on Motion to Enforce Settlement Agreement entered on June 25, 2020;
18. Defendant Smith's Memorandum in Opposition to Plaintiff's Motion to Enforce the Settlement Agreement Dated on December 12, 2018, filed by Appellant on June 30, 2020;
19. Order denying Respondent's Motion to Enforce the Settlement Agreement Dated on December 12, 2018, entered on July 8, 2020;
20. A Motion for Summary Judgment filed by Respondent on October 6, 2020;
21. A Decision granting Respondent's motion for summary judgment was entered on June 21, 2021;
22. Order Granting Motion for Summary Judgment entered on June 21, 2021; and,
23. Order on Motions for Attorney Fees, Costs, Reimbursements and for Final Disbursement in Case No. 2022-CP-08-0910 entered on November 3, 2022.

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

Respectfully submitted this 2 day of January, 2024.

DICKSON DAVIS LAW FIRM, LLC

/s/ Deborah D. Davis

Deborah D. Davis, Esq.

SC Bar No.: 102942

620 Rutherford Street

Greenville, SC 29609

(833) 729-3426 t

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ATTORNEY FOR APPELLANT

South Carolina

Date: January 2, 2024

Other Counsel of Record:

The Law Office David Conor Keys, LLC

D. Conor Keys, Esq.

P.O. Box 14225

Charleston, SC 29422

(843) 906-3998

ATTORNEY FOR RESPONDENT

RECEIVED

Jan 02 2024

SC Court of Appeals

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

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case No. 2021-000793

PATRICIA CLARKIN SMITH AND
WELLS FARGO BANK, NA.,
DEFENDANTS, OF WHOM
PATRICIA CLARKIN SMITH IS
THE APPELLANT,

Appellant(s),

v.

FAMILY SERVICES, INC., AS
CONSERVATOR FOR MURIEL W.
CLARKIN,

Respondent (s).

PROOF OF SERVICE

I certify that I have served the Appellant's **DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** on Respondents **FAMILY SERVICES, INC., AS CONSERVATOR FOR MURIEL W. CLARKIN**, by depositing a copy of it in the United States Mail, postage prepaid, in addition via AIS email to opposing counsel on January 2, 2023, addressed to the attorney(s) of record to the following addresses:

Family Services, Inc.
c/o D. Conor Keys, Esq.
The Law Office David Conor Keys, LLC
Charleston, SC 29609

Attorney for Respondent(s)

Respectfully submitted this 2 day of January , 2024 .

DICKSON DAVIS LAW FIRM, LLC

 /s/ Deborah D. Davis, Esq.

Deborah D. Davis, Esq.

SC Bar No.: 102942

620 Rutherford Street

Greenville, SC 29609

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ATTORNEY FOR APPELLANT(S)

Office Staff

From: Office Staff
Sent: Monday, January 1, 2024 10:44 PM
To: conor@dconorkeyslaw.com
Cc: Deborah Davis; Christy Owens
Subject: Patricia Clarkin Smith v. Family Services, Inc. (Case No. 2021-000793) re: Designation of Matter
Attachments: 2024_01_02_cover_letter_court_appeals_DOM.pdf; 2024_01_01_designated_matter_Smith_P.pdf; 2024_01_01_designated_matter_Smith_P_POS.pdf

Hey Conor,

Please see the attached Designation of Matter. Thanks.

Best Regards,

Dickson Davis Law Firm, LLC
620 Rutherford Street
Greenville, SC 29609
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When you receive correspondence from the Dickson Davis Law Firm, LLC, or request work, review, or any of the above as part of your overall consultation, you understand and acknowledge that any consultation work done prior to executing the fee contract agreement and the engagement letter is subject to hourly billing for document review, correspondence with the prospective client (i.e., emails, phone calls, text messages), correspondence with other third parties with the prospective client's permission. If your consultation exceeds one hour, then your consultation fee will include the flat fee for your initial consultation and overage is billable on an hourly, prorated basis.

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DICKSON DAVIS LAW FIRM

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Jan 02 2024

SC Court of Appeals

DESIGNATION OF MATTER

January 1, 2024

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

VIA EMAIL CTAPPFILINGS@SCCOURTS.ORG

Re : *Family Services, Inc., as Conservator for Muriel W. Clarkin v. Patricia Clarkin Smith and Wells Fargo Bank, NA., Defendants, Of whom Patricia Clarkin Smith is the Appellant*

Case No. : 2017-CP-10-05427

Appellate Case No. : 2021-000793

File Id. : 2023-06-002-PSC-002

Dear Clerk of Court:

Please see the attached Designation of Matter concerning this matter.

Please let me know what further you require from me at this time. Thank you for assistance with this matter.

Respectfully submitted this 2 day of January , 2024 .

/s/ Deborah D. Davis

Deborah D. Davis, Esq.

SC Bar No.: 102942

Attorney for Appellant

cc: The Law Office David Conor Keys, LLC
D. Conor Keys, Esq.
P.O. Box 14225
Charleston, SC 29422
(843) 906-3998

ATTORNEY FOR THE RESPONDENT

/ddd