

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Honorable Mikell R. Scarborough, Master-in-Equity

---

Appellate Case No. 2023-001200  
Civil Action No. 2020-CP-10-04714

---

**RECEIVED**

FEB 21 2024

SC Court of Appeals

William Gorham and Rosalee Gregg Smalls, Plaintiffs,

v.

Alan Gregg, Victoria Manigault, Mary Frances Gregg Steed, Dorothy Gregg Horlbeck, Robert Leroy Gregg, Franklin Gregg, Michael Gregg, Agnes Gregg (daughter of Jesse Gregg), Joanne Gregg (daughter of Jesse Gregg), Murray Chavis, John Doe and Jane Doe, as fictitious names for a class of unknown heirs, devisees, distributees, administrators, or personal representatives of deceased persons Harriet Gregg, Leroy Gregg, Henrietta Fishburn, Agnes Gregg Washington, Jessse "Eddie" Gregg, James Gregg, Leory Gregg, Jr., Agnes A. Gregg, Jesse Gregg, Robert Gregg, and all other persons known or appear of record to have some right, title, interest in, or lien upon the real estate described in the complaint herein, Defendants.

Of whom William Gorham is the Appellant and Robert Leroy Gregg is the Respondent.

---

**PROOF OF SERVICE**

---

I certify that a true copy of the Respondent's Final Brief in the within matter has been served on Appellant, this 20th day of February, 2024, by emailing a copy to Appellant's counsel at [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com) pursuant to Rule 262 of the South Carolina Appellate Court Rules, as amended by Order of the Supreme Court dated May 6, 2022, and further a copy has been

deposited in the United States Mail, postage prepaid, on February 20, 2024 addressed to his attorney, Karen M. DeJong of DeJong Law Firm LLC, 222 West Coleman Blvd., Suite 110, Mt. Pleasant, SC 29464.

Dated: February 20, 2024

s/Kyle T. Varner  
BAKER & VARNER, LLC  
Kyle T. Varner, Esquire  
SC Bar No. 77847  
kvarner@bakerlawsc.com  
One Carriage Lane, Bldg. H  
Post Office Box 31265  
Charleston, SC 29417-1265  
Office: (843) 766-9007  
Fax: (843) 766-1295  
Attorney for Respondent

**BAKER & VARNER, LLC**  
ATTORNEYS AT LAW  
ONE CARRIAGE LANE, BLDG. H (29407)  
POST OFFICE BOX 31265  
CHARLESTON, SC 29417-1265  
PHONE 843.766.9007 • FAX 843.766.1295

BARRY I. BAKER, ATTORNEY  
bbaker@bakerlawsc.com

KYLE T. VARNER, ATTORNEY  
kvarner@bakerlawsc.com

February 20, 2024

VIA UPS

The Honorable Jenny Abbott Kitchings  
Clerk of Court for the South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RE: Appellate Case No. 2023-001200  
Gorham v. Gregg, et al.

**RECEIVED**  
FEB 21 2024  
SC Court of Appeals

Dear Ms. Kitchings:

Pursuant to the Court's letter dated January 31, 2024, enclosed please find one bound copy and an additional unbound copy of Respondent's Final Brief. Additionally, the Respondent's Final Brief was electronically filed on even date herewith.

Should the Court have any questions or need anything further, please do not hesitate to contact me.

Yours truly,

*s/ Barry I. Baker*

Barry I. Baker

BIB/ktv

Enclosure: as stated

cc: Karen DeJong, Esq.

**RECEIVED**

FEB 21 2024

SC Court of Appeals

PROLEGAL DISCOVERY SOLUTIONS 1 LBS 1 OF 1  
8438532888  
PROLEGAL DISCOVERY SOLUTIONS DWT: 12,10,1  
212 HUGER ST.  
CHARLESTON SC 29403

**SHIP TO:**  
THE HONORABLE JENNY ABBOTT KITCHING  
SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE ST  
**COLUMBIA SC 29201-3769**

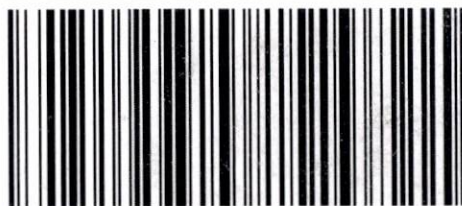


**SC 292 9-01**



**UPS GROUND**

TRACKING #: 1Z HJ0 898 03 2018 9835



BILLING: 3RD PARTY

Trx Ref No.: CHS33141-  
XOL:

1584599 DEBIT Feb 21 04:44:12 2024  
US MIPFB 23.9.0 20220  
1Z HJ0898032018  
9835  
CAMI-5238  
P: GREEN S: MIDRED I: G4  
COLUMBIA SC 29201  
1220 SENATE ST  
SOUTH CAROLINA COURT OF APPEALS