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Mar 06 2024

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

Trial Court Case No.: 2020-CP-07-00829
Appellate Court Case No.: 2023-001278

Carol Jenkins Jackson and Judy Sharon Jenkins Watson, Appellants.

v.

Michael F. Rivers, R.M. Lapp, Trustee for St. Helena Asset Trust, Heirs of Harrison Rivers, Heirs of Ophelia Rivers, Heirs of Harold W. Rivers, Heirs of Rachel Chisholm, Heirs of Florence C. Parker, Heirs at Law of Rueben M. Chisholm, and also Vernell I. Smashum, Barbara McClarking, Beverly J. Scott, Amos Williams, Clifford Huff, Sandra Mack-Huff, a 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 Dor and Mary Roe, including all persons who may be deceased, minors, in the military service of the United States with the naming of Title 50 United States Code, referred to as the Service Members Civil Relief Act, as amended, persons Compos Mentis and any other disability, Defendants,

Of whom Michael F. Rivers is the Respondent.

CERTIFICATE OF SERVICE

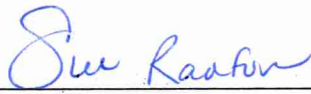
Undersigned certifies that the Respondent's Final Brief to which this certificate is affixed, was served upon the party (s) to this action by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed or by email to the attorney(s) of record:

R. Thayer Rivers, Jr., Esquire
Law Office of R. Thayer Rivers, Jr., Esquire
Post Office Box 668
Ridgeland, South Carolina 29936

in a post office or official depository under the exclusive care and custody of the United States

Postal Service, on March 6, 2024.

KUHN LAW FIRM, LLC

By: 

Sue Radford



**KUHN
LAW
FIRM
LLC**

H. FRED KUHN, JR. ESQUIRE
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Mr. Kuhn's Email: fred@fkuhnlawfirm.com
Sue's Email: sue@fkuhnlawfirm.com

March 5, 2024

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

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SC Court of Appeals

RE: Carol Jenkins Jackson, et al. v. Michael F. Rivers, et al.
Appellate Court Case No.: 2023-001278

Dear Mrs. Kitchings:

Enclosed please find the original and one (1) copy of the Respondent's Final Brief in the above matter. By copy of this letter and the enclosure, I am serving a copy of the same on R. Thayer Rivers, Jr., Esquire.

With kindest regards, I am

Very truly yours,


H. Fred Kuhn, Jr.

HFkjrsr
Enclosures

cc: R. Thayer, Rivers, Jr., Esquire