

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

**RECEIVED**

MAR 18 2024

SC Court of Appeals

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.

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**PROOF OF SERVICE**

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I certify that I have served the Final Brief and Designation of Matter on the Respondent, Michael Rivers, by depositing a copy of same in the United States Mail, postage prepaid, on March 13, 2024, addressed to his attorney of record, H. Fred Kuhn, Jr., Post Office Drawer 507, Ridgeland, SC, 29936

Law Office of R. Thayer Rivers, Jr.

  
R. THAYER RIVERS, JR.

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Attorneys for the Appellant

March 13, 2024

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SC Court of Appeals

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R. THAYER RIVERS, JR.  
ALSO ADMITTED IN GEORGIA

March 14, 2024

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

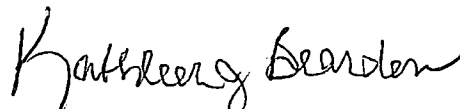
RE: JACKSON, ET AL. v RIVERS, ET AL.  
2020-CP-07-00829  
APPELLATE CASE NO.: 2023-001278

Dear Ms. Kitchings:

Enclosed is our Final Brief and Final Reply Brief (one bound one un-bound) together with the Proof of Service in the above matter.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden  
Paralegal to R. Thayer Rivers, Jr.

:kjb  
Enclosures

cc: H. Fred Kuhn, Jr., Esquire

R. Thayer Rivers, Jr., Esquire  
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