

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**

APR 08 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 Amended Final Reply Brief on the Respondent, Michael F. Rivers, by depositing a copy of same in the United States Mail, postage prepaid, on April 3, 2024, addressed to his attorney of record, H. Fred Kuhn, Jr. Post Office Box 507, Beaufort, SC 29901.

Law Office of R. Thayer Rivers, Jr.

A handwritten signature in black ink, appearing to read "R. Thayer Rivers, Jr.", written over a horizontal line.

R. THAYER RIVERS, JR.

Post Office Box 668

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(843) 726-8136

Attorneys for the Appellants

April 3, 2024

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R. THAYER RIVERS, JR.  
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April 3, 2024

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

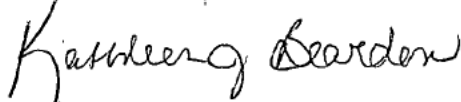
RE: JACKSON, ET AL. v RIVERS, ET AL.  
2020-CP-07-00829  
APPELLATE CASE NO.: 2023-001278

Dear Ms. Kitchings:

In accordance with your letter of March 26, 2024, enclosed is our Amended Final Brief and Amended Final Reply Brief (one bound one un-bound) together with the Proof of Service and Certificate of Counsel 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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