

**PROOF OF SERVICE OF RECORD ON APPEAL FOR APPELLANT**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Apr 18 2024**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Mikell R. Scarborough, Master in Equity

Case No. 2021-000793

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

Appellant(s),

v.

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

Respondent (s).

**PROOF OF SERVICE**

I certify that I have served the Appellant's **RECORD ON APPEAL FOR APPELLANT** on Respondent **FAMILY SERVICES, INC., AS CONSERVATOR FOR MURIEL W. CLARKIN**, by depositing a copy of it in the United States Mail, postage prepaid, or by South Carolina Supreme Court Order 2020-05-29-02 via AIS email to opposing counsel, on April 18, 2024, 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      18      day of April      , 2024 .

DICKSON DAVIS LAW FIRM, LLC

/s/ Deborah D. Davis, Esq.

Deborah D. Davis, Esq.

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ATTORNEY FOR APPELLANT(S)

**Patricia Clarkin Smith v. Family Services, Inc. (Case No. 2021-000793) re: Record on Appeal and Motion to File Out of Time**

Deborah Davis &lt;d.davis@dicksondavislaw.com&gt;

Thu 4/18/2024 11:44 PM

To: conor@dconorkeysllaw.com &lt;conor@dconorkeysllaw.com&gt;

Cc: Christy Owens &lt;legalassistant@dicksondavislaw.com&gt;

Bcc: Smith, Patricia Clarkin &lt;contact+d980ae66-668b-473a-a8c5-b175db0cf653@mailsync.practicepanther.com&gt;

📎 5 attachments (12 MB)

2024\_04\_18\_motion\_file\_out\_time\_POS.pdf; 2024\_04\_18\_motion\_file\_out\_time.pdf; 2024\_04\_18\_ROA\_packet\_online.pdf; 2024\_04\_18\_appellant\_ROA\_POS.pdf; 2024\_04\_18\_cover\_letter\_court\_appeals\_ROA\_v2.pdf;

Conor:

Please see the attached cover letter, motion to file out of time, record on appeal, appropriate certifications and proofs of service. Due to the size, the final appellant brief will be emailed and filed separately.

Best Regards,



Deborah D. Davis, Esq.  
Attorney at Law

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DICKSON DAVIS LAW FIRM

**NOTICE OF MOTION TO FILE OUT OF TIME, RECORD  
ON APPEAL, AND APPELLANT'S FINAL BRIEF**

**April 18, 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, N.A., Defendants, Of whom Patricia Clarkin Smith is the Appellant*

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**Case No.** : 2017-CP-105427

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**Appellate Case No.** : 2021-000793

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

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Dear Clerk of Court:

Please see the enclosed Motion to File Out of Time, Record on Appeal for Appellant, Proof of Service, and Appellant's Final Brief along with certifications.

Thank you for assistance with this matter.

Respectfully submitted this 18 day of April, 2024.

/s/ Deborah D. Davis, Esq.

Deborah D. Davis, Esq.

SC Bar No.: 102942

Attorney for Appellant

cc: The Law Office of David Conor Keys, LLC  
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ATTORNEYS FOR THE RESPONDENTS

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