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**Jun 10 2024**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
In the Court of Appeals

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APPEAL FROM MARION COUNTY  
Court of Common Pleas  
H. Steven DeBerry, IV, Circuit Court Judge

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Appellate Case No.: 2024-000444  
Case No.: 2023-CP-33-00472

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Angela D. Young, as Personal Representative for the Estate of Chellie Nixon .....Appellant,

v.

Carolyn Johnson, as Personal Representative for the Estate of Samuel L. Davis .....Respondent.

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**CERTIFICATE OF SERVICE**

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I, Jon Rene Josey, Esquire of Turner, Padget, Graham & Laney, P.A., attorney for the Respondent, hereby certify that I have this 10<sup>th</sup> day of June, 2024, served the Designation of Matter to be Included in the Record on Appeal **and** Respondent’s Initial Brief to Danny V. Butler, Attorney for the Appellant by mailing and emailing a copy thereof to him at the addresses indicated below:

Danny V. Butler, Esq.  
4420 Oleander Drive, Ste 203  
Myrtle Beach, SC 29577  
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Florence, South Carolina

TURNER, PADGET, GRAHAM & LANEY, P.A.

June 10, 2024

s/ J. Rene’ Josey  
J. René Josey (S.C. Bar #3230)  
Jeffrey L. Payne (S.C. Bar#15136)  
1831 West Evans Street, Fourth Floor  
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REPLY TO:

**J. René Josey**

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June 10, 2024

**VIA EMAIL ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))**

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

Re: In Re: Chellie Nixon  
Angela D. Young, as Personal Representative for the Estate of Chellie Nixon v.  
Estate of Samuel L. Davis  
Appellate Case No.: 2024-000444  
TPGL File No.: 18331.101

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing Respondent's Initial Brief and Designation of the Matter to be included in the Record of Appeal along with Certificate of Counsel for Compliance with Rule 209 and Certificate of Service.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

*s/ J. René Josey*

J. René Josey

JRJ/alb

Enclosure

cc: Danny Butler, Esq. (via US Mail and E-Mail) (w/ enc)