

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SALUDA COUNTY
Court of Common Pleas
Kathy O. Rushton, Special Referee

Case No. 2008-CP-41-00099
Appellate Case No. 2012-208166

RECEIVED

AUG 19 2013

SC Court of Appeals

Bobby Jo Clark, as personal representative of
the Estate of Richard Clark,

Respondent

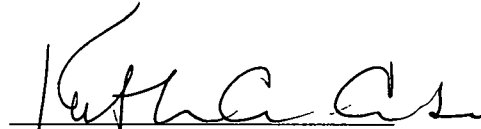
v.

Fairy Bell Irving, Andrew Irving, A/K/A Andrew Erving,
Alfonzo Irving, A/K/A Alfonzo Erving, John D. Irving,
A/K/A John D. Erving, William T. Irving, A/K/A William
T. Erving, Robert Irving, Sr., A/K/A Robert Erving, Sr.,
Sally May Morgan, F/K/A Sally May Irving, Minnie Lee
Butler, F/K/A Minnie Lee Irving, Joyce Thelma Taylor,
F/K/A Joyce Thelma Irving, Mary Irving, A/K/A Mary
Erving, Mamie Irving A/K/A Mamie Erving, Jessie Ina
Irving, A/K/A Jessie Ina Erving, Julious Irving, A/K/A
Julious Erving, Rashell Irving, Fairy May Irving, Thelma
Irving, Anell I. Ray, Julious Irving, Jr., Alfreda Irving,
Thelma Cartlele, Bennie Warren Butler and persons
claiming any right, title estate, interest in or lien upon the
real estate described in the complaint herein, any unknown
adults being a class designated as John Doe; and any
unknown minors or other persons under legal disability
being a class designated as Richard Roe, Defendants,

Of whom Joyce Thelma Irving is the Appellant

PROOF OF SERVICE

I certify that I have served the respondent's initial brief and designation of matter to be included in the record on appeal, by mail, to appellant's attorney, Willie B. Heyward, Heirs' Property Law Center, LLC, 27 Gamecock Avenue, Suite 200, Charleston, South Carolina 29407, on August 19, 2013.



Christian G. Spradley
Moore, Taylor & Thomas, P.A.
110 South Main Street
Saluda, South Carolina 29138
Telephone: 864-445-4544

Katherine Carruth Goode
P.O. Box 1175
229 South Congress Street
Winnsboro, South Carolina 29180
Telephone: 803-799-4440

Attorneys for Respondent