

RECEIVED

Sep 25 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2024-000776

Bonita Steed and Bernard Steed, Robert Steed and Ernest Steed.....Appellants,

v.

Antoine Heyward, Ruby Heyward, and also All Other Persons Unknown, claiming any right, title, estate, interest in or lien upon the real estate described herein in the amended complaint herein.....Respondents.

**RESPONDENTS' DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Karen M. DeJong, Esq.
Bar No. 70699
DeJong Law Firm, LLC
222 West Coleman Blvd., Ste. 110
Mt. Pleasant, SC 29464
(843) 216-6161
(843) 300-1080 (Fax)
karen@dejonglawfirm.com
Attorney for Respondents

September 25, 2024

Respondents propose the following to be included in the Record on Appeal:

1. December 7, 2022 S.C. Court of Appeals Decision in favor of Respondents- Reversed Circuit Court's Order of Summary Judgment and Remanded to Circuit Court- Appellate Case No. 2020-001104
2. Charleston County Master-In-Equity Court Order filed on February 6, 2024 ruling against Appellants' adverse possession claim and laches defense; ruling in favor of Respondents and granting them fee simple ownership to 516 Bank Street, Mount Pleasant, SC after non-jury trial.
3. Charleston County Master-In-Equity Court Order filed on April 10, 2024 Denying Appellants' Motion for Reconsideration re: Adverse Possession and Granting Appellants' Motion to Amend Complaint to add a Betterment cause of action
4. Respondents' Trial Exhibit 1- Recorded Specific Power of Attorney
5. Respondents' Trial Exhibit 2- 1960 Recorded Deed from Foster Graham to Louise Brown Heyward, recorded at the Charleston County ROD Office in Book A72, Page 175
6. Respondents' Trial Exhibit 3- 1999 Recorded Deed from Louise Brown Heyward to Robert James Heyward, recorded at the Charleston County ROD Office in Book H318, P. 831
7. Respondents' Trial Exhibit 4- 2015 Fiduciary Letters to Antoine Heyward re: Estate of Robert Heyward
8. Respondents' Trial Exhibit 5- 2016 Recorded Deed from Estate of Robert Heyward To Ruby and Antoine Heyward, recorded at the Charleston County ROD Office in Book 0556, Page 830
9. Respondents' Trial Exhibit 6- 2013 Bernard Steed to Ruby Heyward Cashiers Check for Real Estate Taxes
10. Respondents' Trial Exhibit 7- 1999 Robert Heyward Payment for Excess Portion to Heyward Family
11. Respondents' Trial Exhibit 8- 2000 to 2014 Real Estate Tax Payments by Robert and Ruby Heyward
12. Respondents' Trial Exhibit 9- Real Estate Tax Bills to Robert Heyward from 2000 to 2013
13. Respondents' Trial Exhibit 10- Real Estate Tax Receipts from 2000 to 2013

paid by Robert Heyward

14. Trial Transcript- September 14, 2023
15. Transcript of Hearing on Appellants' Motion for Reconsideration- February 10, 2024

I CERTIFY THAT THIS DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL CONTAINS NO MATTER WHICH IS IRRELEVANT TO THIS APPEAL.

Dated: September 24, 2024

s/Karen M. DeJong
Karen M. DeJong, Esq.
Bar No. 70699
DeJong Law Firm, LLC
222 West Coleman Blvd., 110
Mt. Pleasant, SC 29464
Tel. No. 843-216-6161
karen@dejonglawfirm.com
Attorney for Respondents