

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite D. Murphy, Master-In-Equity

Case No. 2012-213177

C. S. Carter..... Plaintiff,

vs.

D. J. Brown aka Dan Brown aka Dan J. Brown, Eric Brown, Etholia Brown, Enoch Wesley Brown, Jr., Ernest Brown, Jr. Karen Brown, Lisa Brown, Michael Brown, Rena Brown, Michael C. Brown, Sr. aka Michael C. Brown, Clara B. Moses aka Clara Brown Moses, Mable Brown Moses aka Mable B. Moses, Westbury Ace Hardware, CPM Federal Credit Union, Ford Motor Credit, Sears Roebuck & Company, The St. Paul Campground Association aka St. Paul Campground and JOHN DOE, a fictitious name used herein to designate the unknown heirs at law, distributees, devisees, issue, personal representative, successors and/or assigns of Dorothy Brown and Ernest Brown aka Ernest D. Brown, D. J. Brown aka Dan Brown aka Dan J. Brown, Eric Brown, Etholia Brown, Enoch Wesley Brown, Jr., Ernest Brown, Jr., Karen Brown, Lisa Brown, Michael Brown, Rena Brown, Michael C. Brown, Sr. aka Michael C. Brown, Clara B. Moses aka Clara Brown Moses, Mable Brown Moses aka Mable B. Moses, all being deceased persons or who may be deceased persons, and MARY ROE, a fictitious name designating all other persons and legal entities unknown who may have or claim any right, title, estate, interest in or lien upon the real estate described herein, including any such as may be infants, minors, prisoners, incompetents, or under any other disability, including the Service Members' Civil Relief Act..... Defendants.

AND

Rena Brown aka Renee Brown aka Renee A. Lawrence, Eric Brown aka Eric W. Brown aka Eric Wesley Brown, Lisa Brown aka Lisa Brown-Hoff, Michael Brown aka Michael E. Brown aka Michael Enoch Brown, Karen Brown aka Karen M. Brown aka Karen Michelle Brown, and Michael C. Brown, Sr. aka Michael C. Brown aka Michael Clay Brown-----Third-Party Plaintiffs,

vs.

Dorchester County..... Third-Party Defendant.

OF WHOM

C. S. Carter and Dorchester County..... Respondents,

v.

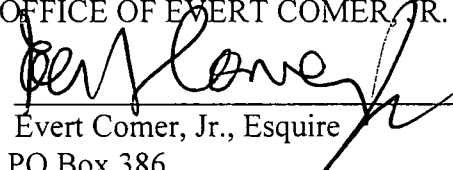
Rena Brown aka Renee Brown aka Renee A. Lawrence, Eric Brown aka Eric W. Brown aka Eric Wesley Brown, Lisa Brown aka Lisa Brown Hoff, Michael Enoch Borwn, Karen Brown aka Karen M. Brown aka Karen Michelle Brown, and Michael C. Brown, Sr. Aka Michael C. Brown aka Michael Clay Brown..... Appellants.

CERTIFICATE FOR REPLY BRIEF

I certify that the final Reply Brief complies with Rule 211(b) of the South Carolina Appellate Court Rules.

LAW OFFICE OF EVERT COMER, JR.

By:



Evert Comer, Jr., Esquire
PO Box 386
Denmark, South Carolina 29042
Telephone (803) 793-3403
Facsimile (803) 793-3550
Email: Ecomerjrattorney@aol.com

ATTORNEY FOR APPELLANTS

Denmark, South Carolina

Dated: August 3, 2013

RECEIVED

AUG 06 2013

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite D. Murphy, Master-In-Equity

Case No. 2012-213177

C. S. Carter..... Plaintiff,

vs.

D. J. Brown aka Dan Brown aka Dan J. Brown, Eric Brown, Etholia Brown, Enoch Wesley Brown, Jr., Ernest Brown, Jr. Karen Brown, Lisa Brown, Michael Brown, Rena Brown, Michael C. Brown, Sr. aka Michael C. Brown, Clara B. Moses aka Clara Brown Moses, Mable Brown Moses aka Mable B. Moses, Westbury Ace Hardware, CPM Federal Credit Union, Ford Motor Credit, Sears Roebuck & Company, The St. Paul Campground Association aka St. Paul Campground and JOHN DOE, a fictitious name used herein to designate the unknown heirs at law, distributees, devisees, issue, personal representative, successors and/or assigns of Dorothy Brown and Ernest Brown aka Ernest D. Brown, D. J. Brown aka Dan Brown aka Dan J. Brown, Eric Brown, Etholia Brown, Enoch Wesley Brown, Jr., Ernest Brown, Jr., Karen Brown, Lisa Brown, Michael Brown, Rena Brown, Michael C. Brown, Sr. aka Michael C. Brown, Clara B. Moses aka Clara Brown Moses, Mable Brown Moses aka Mable B. Moses, all being deceased persons or who may be deceased persons, and MARY ROE, a fictitious name designating all other persons and legal entities unknown who may have or claim any right, title, estate, interest in or lien upon the real estate described herein, including any such as may be infants, minors, prisoners, incompetents, or under any other disability, including the Service Members' Civil Relief Act..... Defendants.

AND

Rena Brown aka Renee Brown aka Renee A. Lawrence, Eric Brown aka Eric W. Brown aka Eric Wesley Brown, Lisa Brown aka Lisa Brown-Hoff, Michael Brown aka Michael E. Brown aka Michael Enoch Brown, Karen Brown aka Karen M. Brown aka Karen Michelle Brown, and Michael C. Brown, Sr. aka Michael C. Brown aka Michael Clay Brown-----Third-Party Plaintiffs,

vs.

Dorchester County.....Third-Party Defendant.

OF WHOM

C. S. Carter and Dorchester County.....Respondents,

v.

Rena Brown aka Renee Brown aka Renee A. Lawrence, Eric Brown aka Eric W. Brown aka Eric Wesley Brown, Lisa Brown aka Lisa Brown Hoff, Michael Enoch Borwn, Karen Brown aka Karen M. Brown aka Karen Michelle Brown, and Michael C. Brown, Sr. Aka Michael C. Brown aka Michael Clay Brown.....Appellants.

PROOF OF SERVICE

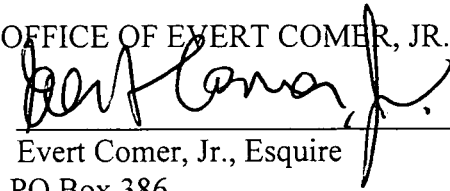
I certify that I have served a copy of the **CERTIFICATE OF COUNSEL FOR THE REPLY BRIEF** on counsel of record for the Respondents by depositing a copy of the same with **PROOF OF SERVICE** in the United States Mail, postage prepaid, on the 3rd day of August, 2013, addressed as follows:

John G. Frampton, Esquire
DORCHESTER COUNTY ATTORNEY
201 Johnston Street
St. George, SC 29477

James E. Reeves, Esquire
JAMES E. REEVES, P.A.
Attorney at Law
400 North Cedar Street
Summerville, SC 29483

LAW OFFICE OF EVERT COMER, JR.

By:



Evert Comer, Jr., Esquire
PO Box 386
Denmark, South Carolina 29042
Telephone (803) 793-3403
Facsimile (803) 793-3550
Email: Ecomerjrattonney@aol.com

RECEIVED

AUG 06 2013

ATTORNEY FOR APPELLANTS

SC Court of Appeals

Denmark, South Carolina

Dated: August 3, 2013