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Nov 04 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity Charleston County

Case No. 2017-CP-10-5427  
Sup. Ct. Case No. 2024-001669

Family Services, Inc., as Conservator for Muriel W. Clarkin.....Respondent,

v.

Patricia Clarkin Smith and Wells Fargo Bank, NA., Defendants,  
Of whom Patricia Clarkin Smith is the ..... Appellant.

NOTICE OF MOTION AND MOTION  
FOR AN EXTENSION OF TIME TO  
FILE THE RETURN TO PETITION OF RESPONDENT  
AND/OR MOTION FOR STAY

Counsel for respondent, Family Services, Inc., as Conservator for Muriel W. Clarkin, respectfully moves before this Court for an order granting Counsel and/or Respondent a stay or extension of time in which to file Respondent’s Return to Petition Brief, until such time that a Special Administrator for the Estate of Muriel W. Clarkin is appointed and directs the undersigned counsel how to proceed on behalf of the Estate. The grounds for the motion are as follows:

- 1) Respondent Family Services, Inc., as Conservator for Muriel W. Clarkin (“Respondent”), was appointed as Mrs. Clarkin’s conservator roughly a decade ago as result of financial issues regarding Mrs. Clarkin’s financial affairs and Mrs. Clarkin’s children and/or heirs, as well as ongoing family strife between the individual children and/or heirs. Theses issues resulted in multiple lawsuits’ naming Mrs. Clarkin’s children and/or heirs as named defendants, including but not limited to this suit, as well as another matter in which this Court denied the petition for writ of Certiorari of another child and/or by Order dated October 2, 2024, in Appellate Case Number 2023-001904, returning the matter to circuit court to proceed forward with trial.

- 2) On September 24, 2024, Mrs. Clarkin passed away at the age of 92, leaving behind four living children and multiple grandchildren (See Exhibit A attached hereto and incorporated herein by reference).
- 3) Given the family strife and pending lawsuits, naming multiple children and/or heirs as named defendants, Respondent on September 30, 2024, filed petition in the Charleston County Probate Court requesting court appointment of a special administrator to administer the Estate of Mrs. Clarkin. At present a Special Administrator has not been appointed nor has a hearing been set on the matter. (See Exhibit A attached hereto and incorporated herein by reference).
- 4) Upon information and belief the pending lawsuits and/or the damages sought or judgments awarded, would be deemed significant assets of the Estate of Mrs. Clarkin, which a special administrator would want to address. However, undersigned counsel is currently without the authority to proceed forward in this matter until such time as a special administrator of the Estate is appointed and directs counsel on how to proceed in this matter.
- 5) Respondent and/or its undersigned Counsel respectfully requests a stay or extension of time in which to file Respondent's Return to Petition, until such time that a Special Administrator for the Estate of Muriel W. Clarkin is appointed and directs the undersigned counsel how to proceed on behalf of the Estate. Undersigned counsel avers before this Court as an officer of the court that he will notify this Court of upon appointment of the special administrator and counsel receiving future direction from the special administrator of the Estate on how to proceed forward with this matter.

November 4, 2024.

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC  
s/ D. Conor Keys  
D. Conor Keys (100148)  
P.O. Box 14225  
Charleston, SC 29422  
Phone: 843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)  
*Attorney for Respondent*



Family Services, Inc. DBA Origin SC

EXHIBIT A

your path to **stability** starts here

FILED

24 SEP 30 PM 3:32

PROBATE COURT  
CHARLESTON COUNTY

September 26, 2024

Charleston County Estate Division  
84 Broad St.  
Charleston, SC 29401

RE: Estate - Muriel Clarkin

To whom it may concern:

This is to notify you that Ms. Muriel Clarkin passed away on September 24, 2024. Family Services Inc. had served as her Conservator (Case #2014GC10-0209).

Please see attached Petition requesting that a Special Administrator be appointed to handle her estate.

There are two ongoing lawsuits involving both Muriel C. Kennedy and Patricia C. Smith, so the Conservator is requesting that a neutral third-party be appointed to handle her estate matters.

Since she just passed away on Tuesday, a death certificate has not yet been issued. However, there is some urgency in this matter, as the family is not able to come to any agreement regarding her final funeral arrangements. Thus, the funeral home's hands are tied and they are in need of a party who has the authority to make final arrangement decisions.

If you have any questions, please feel free to contact my office at any time.

Sincerely,

Kelley Evans  
Fiduciary Services Case Manager



**EXHIBIT A**

4(a). Names and addresses of beneficiaries ( devisees ) named in the Will.

Full Legal Name (including all known names)	Year of Birth	Full Address	Email Address	Relationship to Decedent
Muriel C. Kennedy		4123 Sebago Rd, Meggett SC		Daughter
Patricia C. Smith		602 Atlantic St, Mt. Pleasant SC		Daughter
Charles Clarkin		Unknown		Son
Michael Clarkin (incapacitated)		1040 Ewall St, Mt. Pleasant SC (c/o Conservator)		Son

See attached for additional devisees (check if applicable).

4(b). Names and addresses of intestate heirs who are not devisees (persons who inherit if Decedent left no Will).

Full Legal Name (including all known names)	Year of Birth	Full Address	Email Address	Relationship to Decedent
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

See attached for additional intestate heirs (check if applicable).

4(c). Did all of the above persons survive one hundred and twenty (120) hours since the death of Decedent?

YES  NO If no, please explain on page 4.

5. Did Decedent have any change of marital status or the birth or adoption of any children after execution of this Will, if one exists, or has any child of the Decedent been born since his/her death, or is any birth of a child of the Decedent anticipated? (This includes illegitimate children.)

NO  YES If yes, please explain, on page 4.

6. To the best of your knowledge, was the Decedent a patient in a non-private State of South Carolina mental health facility during his/her lifetime?

NO  YES If yes, please explain, on page 4.

7. Has a Guardian or Conservator ever been appointed by a Court for this person?

NO  YES If yes, please explain on page 4.

8. Has a Personal Representative of the Decedent been appointed prior to this date by a Court in this state or elsewhere?

NO  YES If yes, please state details, including name and address of such Personal Representative on page 4.

9. Have you received or are you aware of any Demands for Notice (FORM #111ES D) of any probate or appointment proceeding concerning the Decedent that may have been filed in this state or elsewhere?

EXHIBIT A

NO  YES If yes, please state details, including names and addresses on page 4.

10. Have more than ten (10) years passed since the Decedent's death?

NO  YES If yes, please state circumstances authorizing tardy probate on page 4.

11(a). Did the Decedent own probate real estate?

NO  YES If yes, an approximate value of \$500,000 (50% interest of 602 Atlantic St) (Note: A complete inventory of probate assets with fair market values is to be filed after Personal Representative is appointed.)

11(b). Did the Decedent own probate personal property?

NO  YES If yes, an approximate value of \$800 (Note: A complete inventory of probate assets with fair market values is to be filed after Personal Representative is appointed.)

11(c). Are you seeking appointment as Personal Representative in order to pursue civil litigation on behalf of the Decedent's estate? Is there a civil litigation attorney?

NO  YES If yes, please provide the name of the civil litigation attorney: \_\_\_\_\_

11(d). At the time of Decedent's death, was he or she involved in any pending civil litigation? Is there a civil litigation attorney?

NO  YES If yes, please state the circumstances and name of attorney on page 4.

11(e). If you answered NO to questions 11(a) - 11(d) above, but are seeking the appointment of a Personal Representative, please explain why the appointment is requested on page 4.

12. Have you made a diligent search for a Will of the Decedent?

YES  
 NO If no, please explain on page 4.

II. IF A WILL EXISTS, PLEASE COMPLETE THIS SECTION.

1. Regarding the Decedent's Will:

EXHIBIT A

- The original is attached.
- The original is in the Court's possession.
- An exemplified (authenticated) copy of a Will probated in another jurisdiction is attached.
- An exemplified (authenticated) copy of a Will not probated in another jurisdiction is attached.
- The original of the Will is lost, destroyed, or otherwise unavailable, however, a copy or a description of its contents is attached. (for formal proceeding, explain below or attach supplemental pleadings)

2. The execution date of the Will was: March 18, 2013  
 Codicil(s): August 5, 2013 and December 20, 2013

3. Is there a memorandum that disposes of tangible personal property pursuant to 62-2-512?

NO  YES If yes, attach hereto.

4. To the best of your knowledge, do you believe the Will listed above is the Decedent's validly executed last Will?

YES  NO If no, please explain on page 4.

5. To the best of your knowledge, is any witness to the will an "interested witness" (i.e., does the will make any devise to a witness, a witness's spouse, or a witness's issue)?

NO  YES If yes, please explain on page 4.

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COMPLETE EXPLANATION(S) FOR QUESTIONS IN SECTIONS I and II HERE.

(If more space is required, use additional sheets.)

7 Family Services Inc. served as her Conservator in Charleston County Probate Court (Case #2014GC10-0209)  
Luke Daniels was her court-appointed Guardian

11d Muriel C. Kennedy, daughter, is a defendant in an ongoing lawsuit against her mother, Case #2016 CP10 5426.  
David Conor Keys is the Plaintiff's attorney, Kerry Koon is the Defendant's attorney.

Patricia C. Smith, daughter, is a defendant in an ongoing lawsuit against her mother, Case #2016 CP10 5427. David  
Conor Keys is the Plaintiff's attorney, Deborah Davis is the Defendant's attorney.

---

III. IF APPLYING FOR INFORMAL OR FORMAL APPOINTMENT, PLEASE COMPLETE THE FOLLOWING.

1. If the Applicant/Petitioner is not the proposed Personal Representative(s), list name and address of the person you are proposing be appointed as the fiduciary:

Third-party Special Administrator

2. Priority for appointment of the proposed Personal Representative (whether applicant or nominee) is:

- named as Primary Personal Representative in Will
- named as Alternate Personal Representative in Will
- nominee of Primary Personal Representative in Will
- nominee of Alternate Personal Representative in Will
- surviving spouse of Decedent who is devisee of Decedent or nominee of said spouse
- other devisee of Decedent (describe): \_\_\_\_\_ or nominee of said devisee
- surviving spouse of Decedent or nominee of said spouse
- other heir of Decedent (describe): \_\_\_\_\_ or nominee of said heir
- creditor (forty-five (45) days after death must have passed) or nominee of creditor; written statement of claim, FORM 371ES, is attached

EXHIBIT A

other (describe): A Special Administrator should be appointed due to ongoing civil litigation involving Muriel C Kennedy (2016-CP-10- 5426) and Patricia C Smith (2016-CP-10- 5427)

3. List below the name(s) of any other person(s), if any, having an equal or higher priority of appointment than the proposed Personal Representative:  
Muriel Kennedy is listed as the PR in the Will – however, she is a party in ongoing litigation against her mother Patricia Smith, proposed alternate PR, is also engaged in ongoing litigation against her mother in a separate suit,

IV. ALL APPLICANTS/PETITIONERS MUST COMPLETE VERIFICATION.

VERIFICATION

The undersigned, being sworn, states that the facts set forth in the foregoing statement are true to the best of the undersigned's knowledge, information and belief, and hereby submits to the Court's jurisdiction in this matter.

SWORN to before me this 26 day of September, 2024

Signature of Applicant/Petitioner: Valley Evans for Family Services Inc

Ellen Pierson

Notary Public for South Carolina  
My Commission Expires: 7/24/2023

SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Signature of Co-Applicant/Co-Petitioner: \_\_\_\_\_

Notary Public for South Carolina  
My Commission Expires: \_\_\_\_\_

ORDER OF INFORMAL PROBATE

IT IS HEREBY ORDERED that the above application for probate of a Will executed \_\_\_\_\_ and

- Codicil executed \_\_\_\_\_ and  
 Memorandum

be informally  GRANTED  DENIED.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_, Probate Court Judge

For formal probate of Will, see separate order executed \_\_\_\_\_.

EXHIBIT A

ORDER OF INFORMAL APPOINTMENT

IT IS HEREBY ORDERED that the above Application for Appointment be granted upon the filing of an appropriate bond, if applicable, and upon the signing of the Qualification and Statement of Acceptance of appointment.

Bond

- Fiduciary Bond in the amount of \$\_\_\_\_\_
- Bond not required for Personal Representative nominated by Will
- Bond not required as Personal Representative is sole heir or sole devisee
- Bond not required as Personal Representative is state agency, bank, or trust company
- Bond waivers filed
- See order dated \_\_\_\_\_
- Other: \_\_\_\_\_

Notice to Creditors

- Required
- Not Required

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2\_\_\_\_\_.

\_\_\_\_\_, Probate Court Judge

For formal appointment of Personal Representative, see separate order executed \_\_\_\_\_.

QUALIFICATION AND STATEMENT OF ACCEPTANCE

I accept this appointment and agree to perform the duties and discharge the trust of the office of Personal Representative of this estate. I further submit personally to the jurisdiction of the Court in any proceeding relating to the Estate.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Work): \_\_\_\_\_

(Home): \_\_\_\_\_

(Cell): \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

EXHIBIT A \_\_\_\_\_

Telephone (Work): \_\_\_\_\_  
(Home): \_\_\_\_\_  
(Cell): \_\_\_\_\_  
Email: \_\_\_\_\_

\*Attorney: \_\_\_\_\_  
Address: \_\_\_\_\_

Telephone: \_\_\_\_\_  
Email: \_\_\_\_\_

**\*By completing this information, attorney is designated as attorney of record for assisting Personal Representative until proper withdrawal.**

EXHIBIT A

STATE OF SOUTH CAROLINA )

IN THE PROBATE COURT

COUNTY OF CHARLESTON )

FILED

APPLICATION/\*PETITION FOR APPOINTMENT OF SPECIAL ADMINISTRATOR

IN THE MATTER OF:  
MURIEL CLARKIN  
(Decedent)

24 SEP 30 PM 3:39

CASE NUMBER:

PROBATE COURT  
CHARLESTON COUNTY

**\*COMPLETE THIS SECTION ONLY IF FILING PETITION FOR SPECIAL ADMINISTRATOR**

\*  
Petitioner(s)

vs.

\*  
Respondent(s)

**INFORMAL**

**\*FORMAL**

Appointment of a Special Administrator is requested:

**INFORMAL PROCEEDING:**

- to protect the Estate of Decedent prior to the appointment of a general Personal Representative.
- to safeguard Estate assets until a Successor Personal Representative is appointed due to the death or disability of \_\_\_\_\_, the previously appointed Personal Representative.
- to enforce a creditor's security interest upon property of the Estate or to institute proceedings to establish the Decedent's liability to the extent of the limits of insurance protection only.
- to take appropriate actions involving Estate assets, specifically: A third-party Special Administrator should be appointed due to ongoing civil litigation involving her daughters Muriel C Kennedy (2016-CP-10- 5426) and Patricia C Smith (2016-CP-10- 5427)

- to obtain medical, tax, or other confidential records, specifically: \_\_\_\_\_.
- to gain access to and take possession of any Wills, deeds to cemetery plots, and insurance policies, or other Estate related documents in Decedent's safe deposit box located at: \_\_\_\_\_.
- Other: \_\_\_\_\_.

**FORMAL PROCEEDING:**

- Appointment of a Special Administrator is requested to preserve the Estate and to secure the Estate and to secure the Estate's proper administration because: \_\_\_\_\_.
- Other: \_\_\_\_\_.

**\*NOTE: IF THIS IS A FORMAL PROCEEDING, IN ADDITION TO A PETITION, YOU MUST ALSO FILE A SUMMONS (FORM SCCA 401PC) AND PAY THE STATUTORY FILING FEE OF \$150.00. A HEARING IN THE PROBATE COURT ON THE PETITION MAY BE REQUIRED.**

EXHIBIT A

VERIFICATION

The undersigned, being sworn, states that the facts set forth in the foregoing statements are true to the best of the undersigned's knowledge, information and belief; and hereby submits to the Court's jurisdiction in this matter.

SWORN to before me this 26<sup>th</sup> day of September, 2024

Ellen Frierson  
Notary Public for South Carolina  
My Commission Expires: 7/24/2033

Signature: Kelly Evans for Family Services P  
Print Name: Family Services Inc. dba Origin SC  
Address: PO Box 118006  
Charleston SC 29423  
Telephone (Work): (843) 628-2107  
(Home): \_\_\_\_\_  
(Cell): \_\_\_\_\_  
Email: kevans@originsc.org  
Relationship to Decedent/Estate: Conservator

ORDER FOR HEARING

IT IS HEREBY ORDERED that a hearing on this matter be set for:

DATE: \_\_\_\_\_  
TIME: \_\_\_\_\_  
PLACE: \_\_\_\_\_

Pursuant to SCPC 62-1-401, Petitioner is ordered to give notice of this hearing to all interested persons at least twenty (20) days prior to the hearing date.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
, Probate Court Judge

ORDER OF APPOINTMENT

IT IS HEREBY ORDERED that the above application/petition for appointment of Special Administrator in the above estate be

GRANTED  DENIED as follows:

RESTRICTIONS: \_\_\_\_\_

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
, Probate Court Judge

EXHIBIT A

---

**QUALIFICATION AND STATEMENT OF ACCEPTANCE**

I accept appointment and agree to perform the duties and discharge the trust of the office of Special Administrator of the foregoing Estate and submit to the jurisdiction of the Court in this matter.

Signature: \_\_\_\_\_  
Print Name: \_\_\_\_\_  
Address: \_\_\_\_\_

Telephone (Work): \_\_\_\_\_  
(Home): \_\_\_\_\_  
(Cell): \_\_\_\_\_  
Email: \_\_\_\_\_

Attorney: \_\_\_\_\_  
Address: \_\_\_\_\_

Telephone: \_\_\_\_\_  
Email: \_\_\_\_\_

EXHIBIT A



**Julie J. Armstrong**  
Charleston County Clerk of Court

Charleston County  
Circuit Court Case Details  
Public Index

- [Charleston County Home Page](#)
- [Clerk of Court Home Page](#)
- [Magistrates Court](#)
- [SC Judicial Home Page](#)
- [Search Tips](#)

Switch View					
<b>Family Services Inc , plaintiff, et al VS Bridget D Inman , defendant, et al</b>					
Case Number:	2017CP1005426	Court Agency:	Common Pleas	Filed Date:	10/20/2017
Case Type:	Common Pleas	Case Sub Type:	Breach of Cont 140	File Type:	Jury
Status:	Stayed	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:		Disposition Date:		Disposition Judge:	
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties								Judgments	Tax Map Information	Associated Cases	Actions	Financials
Click the  icon to show associated parties.												
Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated					
Berlinsky, Bruce Alan (Inactive)	PO Box 206 Charleston SC 294020206				Defendant Attorney		10/17/2019					
Clarkin, Muriel W					Plaintiff		10/23/2017					
DeJong, Karen Marie	222 West Coleman Boulevard Suite 110 Mt. Pleasant SC 29464				Attorney		08/09/2019					
Family Services Inc					Plaintiff		03/10/2021					
Family Services Inc as conservator					Plaintiff		10/23/2017					
Inman, Bridget D					Defendant		09/14/2023					
Kennedy, Muriel C					Defendant		07/21/2020					
Keys, David Conor	PO Box 14225 Charleston SC 29422				Plaintiff Attorney		10/20/2017					
Koon, Kerry W.	147 Wappoo Creek Drive, Ste. 203 Charleston SC 29412				Defendant Attorney		02/25/2020					
O'Connell, Michael P.	Stirling & O'Connell PO Box 828 Mt. Pleasant SC 29465				Defendant Attorney		10/17/2019					
Smith, Patricia Clarkin					Other Party to Case		02/16/2021					
Story, Matthew Joseph (Inactive)	126 Seven Farms Drive Suite 200 Charleston SC 29492				Mediator		05/18/2018					
Thompson, Joseph DuRant III (Inactive)	111 Coleman Boulevard, Suite 301 Mount Pleasant SC 29446				Alternate Mediator		05/18/2018					

**FILED**  
**24 SEP 30 PM 3:39**  
**PROBATE COURT**  
**CHARLESTON COUNTY**

EXHIBIT A



**Julie J. Armstrong**  
Charleston County Clerk of Court

Charleston County  
Circuit Court Case Details  
Public Index

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- Search Tips

Switch View					
<b>Family Services Inc , plaintiff, et al VS Patricia Clarkin Smith , defendant, et al</b>					
Case Number:	2017CP1005427	Court Agency:	Common Pleas	Filed Date:	10/20/2017
Case Type:	Common Pleas	Case Sub Type:	Real Prop/Other 499	File Type:	Non-Jury
Status:	Judgment	Assigned Judge:	Scarborough, Mikell R.		
Disposition:	Default Uncontested	Disposition Date:	06/21/2021	Disposition Judge:	Scarborough, Mikell R.
Original Source Doc:		Original Case #:			
Judgment Number:	2017CP1005427	Court Roster:			

<span style="margin-right: 10px;">Case Parties</span> <span style="margin-right: 10px;">Judgments</span> <span style="margin-right: 10px;">Tax Map Information</span> <span style="margin-right: 10px;">Associated Cases</span> <span style="margin-right: 10px;">Actions</span> <span>Financials</span>							
For:	Family Services Inc	Against:	Smith, Patricia Clarkin	Judg. Amount:	\$81,149.13	Judgment Date:	06/21/2021
Description:	Judgment/Summary Judgment	Disposition:		Disp. Date:		Date Entered/Last Changed	06/21/2021 --
Notes:	None						
<b>Judgment Details</b>							
Claims Code	Detail Desc.	Detail Amount	Detail Date				
None							

FILED

24 SEP 30 PM 3:39

PROBATE COURT  
CHARLESTON COUNTY

DEATH CERTIFICATION

139-2024-042539

\* MURIEL WALSH CLARKIN \*

AKA: N/A

DECEDENT INFORMATION

DATE OF DEATH: SEPTEMBER 24, 2024  
PLACE OF DEATH TYPE: DECEDENT'S HOME  
PLACE OF DEATH NAME AND ADDRESS: 4123 SEBAGO ROAD, MEGGETT, SC, 29449  
CITY OF DEATH: MEGGETT  
MARITAL STATUS: WIDOWED (AND NOT REMARRIED)  
SURVIVING SPOUSE: N/A  
MOTHER NAME: MURIEL DEAN  
FATHER NAME: MICHAEL ANTHONY WALSH  
RESIDENCE: 4123 SEBAGO ROAD, MEGGETT, CHARLESTON COUNTY, SC,  
29449

TIME OF DEATH: 1610  
SOCIAL SECURITY NUMBER: [REDACTED]  
COUNTY OF DEATH: CHARLESTON  
DATE OF BIRTH: [REDACTED]  
AGE: 92 YEARS  
PLACE OF BIRTH: SOUTH CAROLINA  
SEX: FEMALE  
ARMED FORCES: NO

INFORMANT INFORMATION

NAME: MURIEL KENNEDY  
MAILING ADDRESS: 4123 SEBAGO ROAD, MEGGETT, SC, 29449

RELATIONSHIP: DAUGHTER

DISPOSITION/FUNERAL HOME INFORMATION

PLACE: ST. LAWRENCE CEMETERY, CHARLESTON, SC, 29401  
FUNERAL HOME: MCALISTER-SMITH FUNERAL HOME - GOOSE CREEK  
FUNERAL HOME ADDRESS: 869 ST. JAMES / PO BOX 247 AVENUE, GOOSE CREEK, SC, 29445  
FUNERAL DIRECTOR NAME: DONALD JAMES MILLER  
EMBALMER: ZACHARY T PARKER

METHOD: BURIAL  
LICENSE NUMBER: FDE2588  
LICENSE NUMBER: FDE4661

MEDICAL INFORMATION

CERTIFIER: MD ADAM SILBIGER  
ADDRESS: 2680 ELM PLANTATION BOULEVARD, NORTH CHARLESTON, SC, 29406  
CAUSE OF DEATH - PART I:  
SENILE DEGENERATION OF BRAIN

LICENSE NUMBER: 29053  
MANNER OF DEATH: NATURAL

OTHER SIGNIFICANT CONDITIONS - PART II: N/A

CORONER CONTACTED?: YES  
DATE OF INJURY: N/A  
LOCATION OF INJURY: N/A  
PLACE OF INJURY: N/A  
HOW INJURY OCCURRED: N/A

AUTOPSY PERFORMED?: NO  
AUTOPSY AVAILABLE?: N/A  
TIME OF INJURY: N/A  
INJURY AT WORK?: N/A

DATE FILED: SEPTEMBER 27, 2024

DATE ISSUED: SEPTEMBER 27, 2024

AMENDMENT HISTORY

N/A

SC13003671

This is a true certification of the facts on file in the Division of Vital Records, SC Department of Public Health.

*E. D. Simmer*

Edward D. Simmer, MD, MPH, DFAPA  
Director and State Registrar

*Caleb N. Cox*

Caleb N. Cox  
Assistant State Registrar

This is watermarked paper. Do not accept without noting watermark. Hold to light to verify watermark.

Revision Date: 08/09/2022



RECEIVED

Nov 04 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity Charleston County

Case No. 2017-CP-10-5427  
Appellate Case No. 2021-000793

Family Services, Inc., as Conservator for Muriel W. Clarkin.....Respondent,

v.

Patricia Clarkin Smith and Wells Fargo Bank, NA., Defendants,  
Of whom Patricia Clarkin Smith is the ..... Appellant.

PROOF OF SERVICE

I certify that on this 4th day of November 2024, I have served Respondent’s Motion upon Petitioner’s counsel by electronic mail via counsel’s email as listed on AIS.

Deborah D. Davis  
Dickson Davis Law Firm, LLC  
620 Rutherford Street  
Greenville, SC 29609  
Phone: 864-729-3428  
[d.davis@dicksondavislaw.com](mailto:d.davis@dicksondavislaw.com)

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC  
*s/ D. Conor Keys*  
D. Conor Keys (100148)  
P.O. Box 14225  
Charleston, SC 29422  
Phone: 843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)  
*Attorney for Respondent*

THE LAW OFFICE OF  
**DAVID CONOR KEYS LLC**  
PO Box 14225 CHARLESTON, SC 29422  
CONOR@DCONORKEYSLAW.COM  
843-906-3998

November 4, 2024

Patricia A. Howard  
Clerk of Court, Supreme Court of SC  
P.O. Box 11330  
Columbia, SC 29211  
[suptfilings@sccourts.org](mailto:suptfilings@sccourts.org)

**RECEIVED**

**Nov 04 2024**

**SC Court of Appeals**

**RE: Family Services, Inc., Conservator for Muriel W. Clarkin v. Patricia  
Clarkin Smith  
Sup Ct. Case No. 2024-001669**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellant's Motion for Extension of Time to file Respondents Return to Petition;
- 2) Proof of Service for the Motion; and
- 3) Check for \$50.00 for the filing fee.

I kindly request that you file the same

With kind regards,

RESPECTUFLY SUBMITTED,

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC



---

D. Conor Keys (100148)  
P.O. Box 14225  
Charleston, SC 29422  
Phone: 843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)  
*Attorney for Respondent*

Enclosures:  
(as stated)  
CC:  
Deborah D. Davis