

The finding of facts submitted to the court found the attorney for the defendant is factually incorrect. The probate court found that the three wills that were written were fraudulent and ordered the defendants to return all properties to the estate of Florine Alethea Heyward

the properties that were transferred from Florine Alethea Heyward to Florence Heyward Davis was done by quitclaim deed signed by Florence Heyward Davis with power of attorney, Florine Alethea Heyward was not present and was suffering from Alzheimer's and dementia, which was the cause of deaths

The first will that was written gave the properties to Tyrone Ulysses Heyward to be his until death. All the other wills and all property was systematically rewritten to give Florence all the properties to herself. The power of attorney does not allow for the person holding the power of attorney to enrich themselves. The wills and the bank records clearly show that there is self-enrichment.

Florence Heyward David was found guilty of fraud and from USC Hospital and a part of the settlement. In that case she had to attend a course to rehab, and she was allowed again to work as a registered nurse, the evidence that she has already been convicted of fraud is not mentioned in the finding of facts written by her attorney and signed by the judge. There is a clear attempt to defraud the court by not revealing to the judge that was revealed in the deposition of her fraudulent conviction. Question the is Florine Alethea Heyward gave to Florence Heyward Davis, the properties that she claims she was given by the power of attorney. Why did she have to write a Will 14 days before her mother died. Transferring everything to herself. The mere fact that she submitted this will to the court should raise doubt to the validity that she is claiming in this case From the time Florine Alethea Heyward was recognized with Alzheimer's (over a period of 10 years. She had no legal ability to make decision and relied on Florence Heyward Davis who she trusted, as well as the other members of the family that believes she would be the best person in the family to have to power of attorney this was where the fraud takes place because the other siblings were defrauded of their rightful inheritance is by fraudulent documents and friends, and coworkers of Florence Heyward Davis, who signed as witnesses to the will. While the medical records show that she was unresponsive and delusional. The records that they have fought so hard to keep out of the court speak for itself. We are just asking for an opportunity for courts to see the records. The medical as well as the financial is overwhelming. By denying There is no way that she could have participated in any of the writing of the wills are to be able to give a legal commitment to the changing of the wills and that is well-established by all of the properties being taken away from her in the probate court and put back in the name of the estate.

See affidavit A, will number one, B will number two, C will number three

Whereas the lawyers for Florence Heyward Davis change four times, each time they petition the court to have time for the new lawyer to familiarize himself with the case, this cause is seen as constant delays that made the case go this far. Almost 4 years what it is that justification was a member of the same law firm. So, what is the need for them to refamiliarize themselves when the law firm still has the same records the same evidence. I believe that this was another attempt to mislead the court and to drag the case out to ask for a summary judgment in which they created the delays since the courts counter shows how many times this case has been delayed by the defendant lawyers. The decision of summary judgment ordered by the court granted by the judge on October 18, 2024, the court was given information that was fraudulent and misleading the judge in her decision to sign the document. We bring to the court the information from the electronic filing and the official records from the court public record index that clearly shows the manipulation by the attorneys to seek the judge decision.

On October 17, 2024, at 2:00 PM, the attorney for Florence Heyward Davis filed an electronic motion to the Court of Common Pleas asking for order of summary judgment. The order was signed and granted by the judge on October 18, 2024. The defendant pro se asked that the motion of summary judgment ordered by the court be reviewed

We pray that the court will reverse the summary judgment and allow the court to move forward with the trial. The trial that would determine the fraud case is essential reason for the filing of the charge itself. If the court were to allow the summary judgment to stand. It will greatly weaken the civil case and would cause financial damage to all the complaints in the case. The case circles around the defendant fraudulently signing three wills that have already been rejected by the probate court. After the court determined that the wills were all fraudulent. The trial went forward as Florine Alethea Heyward was intestate the wills and the bank accounts that will be presented at the trial will clearly show that the defendant systematically over 10-year period misappropriated the funds that she was supposed to safeguard as the power of attorney. Furthermore, the evidence will clearly show that each of the wills that was sign with a power of attorney and with quitclaim deeds all benefited the defendant, the bank records that will be produced at the trial shows a pattern of withdrawal from the account of Florine Alethea Heyward going into a savings account. Then withdraw using a credit card and electronic transmission. The evidence in this case is overwhelming. The defendant has already been convicted of fraudulent case when she was found guilty, and a fraud case brought by MUSC hospital where she was employed as a registered nurse. There is so much evidence that is on the side of the complainants in this case. The defendant in this case with her attorneys are trying to further take from these surviving heirs. What is rightfully theirs that was stolen through fraud. I pray that you would allow the trial to go forward and reverse this decision.

Respectively submitted, October 25, 2024

George S Jenkins pro- se

RECEIVED

Nov 12 2024

SC Court of Appeals

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I George S. Jenkins will mail to South Carolina Court of Appeal, a certified check for \$300 to pay for the notice of appeal \$250, and \$50 for motion to stay. It will be delivered by US mail on Tuesday November 12, 2026