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Dec 16 2024

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Supreme Court of South Carolina**

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity Judge

Case No. 2022-CP-10-03492
Appellate Case No.: 2023-001086
Supreme Court Case No.: 2024-002005

PVONE REO LLC

Respondent,


v.

Mary A. White et al,

Appellant.

REPLY PETITION FOR CERTIORARI

December 16, 2024


DeWayne A. Sykes
1953 Jacksonville road
N. Charleston, South Carolina 29405
(843) 478-5735
Appellant

CC: John Dodds III
858 Low County Bld ste, 101, Mt, Pleasant, South Carolina 29464

Stephen Peterson Groves
25 Calhoun street, Suite 250 Charleston, South Carolina 29401

Kelly Woody
P.O. Box 6432, Columbia SC 29260

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CERTIFICATE OF PETITIONER

Petitioner, acting on their own behalf, certifies that the Petition for Rehearing was duly filed and ruled upon by the South Carolina Court of Appeals on November 25, 2024.

QUESTIONS PRESENTED

In the Court of Appeals

I. Jurisdictional Deficiency and Improper Service of Process

1. Did the Master in Equity Court err in affirming in it's ruling that Respondent PVOne REO, LLC properly served Mary A White, the heirs of , and the Petitioner at 1935 Jacksonville Road when the correct address was 1953, and 1959 Jacksonville Road, in violation of Rule 4 of the South Carolina Rules of Civil Procedure and Mary A White, the heirs of ,and Petitioner's due process rights?.....4
2. Did the Master in Equity Court err in failing to recognize that the Respondent's incorrect property description and reliance on misleading information regarding multiple parcels deprived the lower court of jurisdiction?.....4
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Petition for Rehearing

6. Did the Court of Appeals err by dismissing the appeal based on a misunderstanding of the facts concerning compliance with Rule 209, SCACR, and failing to acknowledge verifiable proof of submission of relevant documents?.....5
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To The Supreme Court

11. Are the orders on appeal interlocutory, where they affect the Due Process and other rights of Petitioner and Mary White and the heirs?.....6

12. Was the circuit court / Master in Equity Court without jurisdiction to hear the case, which was explicitly based on improper service of process of the summons and complaint.....6

13. Did the Court of Appeals err in finding that no material fact or principle of law was overlooked or disregarded, despite substantial evidence to the contrary?.....6

14. Did the Court of Appeals err in practicality affirming the Master in Equity Court in affirming in it’s ruling that Respondent PVOne REO, LLC properly served Mary A White, the heirs of , and the Petitioner at 1935 Jacksonville Road when the correct address was 1953, and 1959 Jacksonville Road, in violation of Rule 4 of the South Carolina Rules of Civil Procedure and Mary A White, the heirs of ,and Petitioner’s due process rights?.....6

15. Did the Courts err in finding when the Respondent and its attorneys knowingly misled the court by claiming to serving the Summons and Complaint at the wrong address leads to Deception Leading to a Default Judgment and causing the court to erroneously conclude it had jurisdiction did not undermined the fairness of the legal process and violated the Appellant’s right to a fair hearing?.....7

STATEMENT OF THE CASE

This case arises from the Court of Appeals’ dismissal of Appellant’s appeal for alleged non-compliance with the South Carolina Appellate Court Rules. Specifically, the Court dismissed the appeal on the basis that the Record on Appeal did not conform to Rule 209, SCACR.

Appellant asserts that:

- All relevant documents were submitted and transmitted via registered mail to the Master in Equity’s office, as verified by proof of submission.
- Efforts to secure the Supersedeas Bond hearing transcript were made but ignored by the lower court’s office.
- The dismissal order issued by the Court of Appeals on October 16, 2024, lacked specificity, failing to identify the alleged deficiencies in the Record.

Despite these facts, the Court granted Respondent’s motion to dismiss without affording Appellant the opportunity to amend or correct the Record. This resulted in an unjust outcome contrary to principles of due process and judicial fairness.

The Petitioner, DeWayne Sykes, seeks review of a default judgment issued by the Master in Equity Court and affirmed by the Court of Appeals, concerning a tax sale dispute involving property located at 1959 Jacksonville Road. The Respondent, PVOne REO, LLC, initiated the proceedings by filing a complaint alleging delinquent taxes. However, the Respondent improperly served the summons and complaint at an incorrect address, 1935 Jacksonville Road, rather than at the Petitioner’s correct addresses (1953, 1959, and 1965 Jacksonville Road).

The Master in Equity Court issued a default judgment in favor of Respondent despite the

jurisdictional deficiencies and the misleading information provided in the complaint. The Court of Appeals subsequently affirmed the judgment and dismissed Petitioner's appeal, finding no material errors in the court's proceedings. This petition asserts that these decisions were erroneous and violated Petitioner's due process rights.

Argument

1. Jurisdictional Deficiency and Improper Service of Process

Petitioner argues that the Master in Equity Court erred in affirming that PVOne REO, LLC properly served Mary A. White, her heirs, and the Petitioner at 1935 Jacksonville Road when the correct addresses were 1953 and 1959 Jacksonville Road. Under SCRCP Rule 4, proper service by publication requires strict adherence to statutory and procedural requirements. The incorrect address used in the Summons and Complaint invalidates service, as demonstrated in cases such as *Jones v. Wallis*, 211 N.C. App. 353, 712 S.E.2d 180 (2011). The incorrect property descriptions and misleading information regarding multiple parcels deprived the court of jurisdiction, rendering the judgment void under established South Carolina law, including *Universal Benefits, Inc. v. McKinney*, 349 S.C. 179, 561 S.E.2d 659 (Ct. App. 2002). The Master in Equity Court erred by failing to recognize the jurisdictional deficiencies created by the Respondent's reliance on incorrect property descriptions and misleading information. The discrepancy between the property identified in the complaint (1935 Jacksonville Road) and the actual subject of the dispute (1959 Jacksonville Road) created confusion and deprived the Appellant of adequate notice regarding the nature of the claims.

The same with the notice of appointment with the Gal who sent notice served Mary A. White, her heirs, and the Petitioner at 1935 Jacksonville Road when the correct addresses were 1953 and 1959 Jacksonville Road. Under SCRCP Rule 4, proper service requires strict adherence to statutory and procedural requirements.

Moreover, the reliance on an ambiguous tax map sequence number (TMS 466-03-00-154), which encompassed multiple parcels, further obfuscated the claims and impeded the Appellant's ability to defend against the allegations. Such misleading actions undermine the principles of fairness and judicial integrity. Proper jurisdiction cannot be established on the basis of vague or incorrect descriptions that prevent parties from understanding the claims against them.

2. Reliance on Incorrect Property Description and Deceptive Actions

The Master in Equity Court's failure to recognize that the Respondent relied on misleading information regarding multiple parcels led to jurisdictional deficiencies. Service at 1935 Jacksonville Road, rather than 1953 and 1959 Jacksonville Road, was not only incorrect but also misleading. Such reliance on incorrect property descriptions undermines the court's jurisdiction, violating principles set forth in *Richardson Construction Co. v. Meck Engineering & Construction Co.*, 274 S.C. 307, 262 S.E.2d 913 (1980), and *Caldwell v. Wiquist*, 402 S.C. 565, 741 S.E.2d 583 (Ct. App. 2013).

3. Default Judgment Based on Improper Service and Jurisdictional Deficiency

The issuance of a default judgment based on improper service of process and jurisdictional deficiencies was legally insufficient under South Carolina law. In *Universal Benefits, Inc. v.*

McKinney, 349 S.C. 179, 561 S.E.2d 659 (Ct. App. 2002), the court held that lack of personal jurisdiction due to defective service renders judgments void. The default judgment issued in this case should therefore be vacated as it lacks jurisdiction due to the improper service of process.

4. Sykes Letter and Notice of Tax Sale

The April 2022 letter from the Brethren of Love Society (Sykes letter) cannot serve as notice of a tax sale for 1959 Jacksonville Road. The Master in Equity Court erred in affirming this notice, as the incorrect property description rendered it legally insufficient. The reliance on the Sykes letter violated SCRCP Rule 4 and denied due process to Mary A. White, her heirs, and Petitioner, further undermining jurisdiction. The Master in Equity Court erred in its finding. The April 2022 letter from the Brethren of Love Society, known as the Sykes Letter, cannot be construed as notice of a tax sale at 1959 Jacksonville Road. The letter was addressed to Pine Valley One Real Estate LLC, not PVOne REO, LLC, and lacked any indication that it pertained to a tax sale for the 1959 Jacksonville Road property.

Additionally, the letter's content did not meet the standards of notice required under South Carolina tax sale law, which demands clear and unequivocal notification of the tax sale process. The Respondent's attempt to rely on this unrelated correspondence to establish notice is both procedurally and substantively flawed, further undermining the validity of the proceedings.

5. Proper Plaintiffs and Jurisdiction

The Master in Equity Court erred by affirming that PINE VALLEY ONE REAL ESTATE LLC was a proper plaintiff along with PVOne REO, LLC. The Petition for Rehearing demonstrates that PVOne REO, LLC lacked standing, as established in *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992). PINE VALLEY ONE REAL ESTATE LLC was not properly established as a party to this case, thus violating SCRCP Rule 17. The Master in Equity Court erred in this regard. Pine Valley One Real Estate LLC and PVOne REO, LLC are distinct entities with separate legal identities. The Court's conflation of the two entities creates confusion regarding the actual Plaintiff in this case.

Such confusion affects the Appellant's ability to adequately respond to the claims and undermines the integrity of the judicial process. Without clear identification of the proper Plaintiff, jurisdiction and standing become uncertain, further invalidating the Court's rulings.

6. Misunderstanding of Compliance with Rule 209, SCACR

The Court of Appeals erred in dismissing the appeal based on a misunderstanding of the facts regarding compliance with Rule 209, SCACR. Petitioner submitted verifiable proof of compliance, yet the dismissal order lacked specificity, in violation of due process principles as affirmed in *Richardson Construction Co. v. Meck Engineering & Construction Co.*, 274 S.C. 307, 262 S.E.2d 913 (1980).

7. Vagueness of the Dismissal Order

The dismissal order issued by the Court of Appeals was impermissibly vague and lacked specificity, violating due process principles. The Court of Appeals failed to provide detailed guidance on how to correct the Record, thereby depriving Petitioner of the opportunity to amend under Rule 240, SCACR, as required by *Caldwell v. Wiquist*, 402 S.C. 565, 741 S.E.2d 583 (Ct. App. 2013).

8. Opportunity to Amend or Correct Record

The Court of Appeals should have permitted Appellant to amend or correct the Record on Appeal. Procedural errors related to Record non-compliance should not result in automatic dismissal, as established in Rule 240, SCACR, which promotes fairness and judicial economy. The failure to allow for such amendments contravenes the principles set forth in *Universal Benefits, Inc. v. McKinney*, 349 S.C. 179, 561 S.E.2d 659 (Ct. App. 2002).

9. External Factors and Procedural Irregularities

The Court of Appeals erred by failing to account for procedural irregularities and external factors, such as ignored requests for essential transcripts. Appellant made diligent efforts to obtain these transcripts, but no response was received, as noted in *Universal Benefits, Inc. v. McKinney*, 349 S.C. 179, 561 S.E.2d 659 (Ct. App. 2002). This failure unjustly penalized Appellant.

10. Misapplication of Rule 210(c), SCACR

The Court of Appeals misapplied Rule 210(c), SCACR, as Appellant diligently complied with Rule 209 in designating and submitting all relevant materials. Any perceived deficiencies should have been corrected rather than resulting in dismissal, as supported by *Universal Benefits, Inc. v. McKinney*, 349 S.C. 179, 561 S.E.2d 659 (Ct. App. 2002).

11. Interlocutory Orders and Due Process Violations

The orders on appeal are interlocutory because they affect the due process rights of Petitioner and Mary A. White and her heirs. The judgments based on jurisdictional deficiencies due to improper service of process violate these fundamental rights, as emphasized in *Caldwell v. Wiquist*, 402 S.C. 565, 741 S.E.2d 583 (Ct. App. 2013).

12. Jurisdictional Deficiency

The Circuit Court/Master in Equity Court was without jurisdiction to hear the case due to the improper service of process. Under *Richardson Construction Co. v. Meck Engineering & Construction Co.*, 274 S.C. 307, 262 S.E.2d 913 (1980), judgments issued without proper jurisdiction are void.

13. Error in Court of Appeals Finding No Material Facts Overlooked

The Court of Appeals erred in finding no material facts or principles of law were overlooked or disregarded, despite substantial evidence to the contrary. The reliance on incorrect property descriptions and misleading service actions deprived the court of jurisdiction, as established in *Jones v. Wallis*, 211 N.C. App. 353, 712 S.E.2d 180 (2011).

14. Jurisdictional Deficiency and Misleading Service

The Court of Appeals erred by affirming the Master in Equity Court's ruling that PVOne REO, LLC properly served Mary A. White, her heirs, and the Petitioner at 1935 Jacksonville Road when the correct addresses were 1953 and 1959 Jacksonville Road. Such service violates Rule 4 of the SCRPC and Petitioner's due process rights.

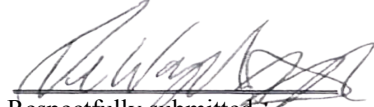
15. Deception and Default Judgment

The courts erred in concluding that Respondent and its attorneys did not engage in deception by claiming service at the wrong address, leading to a default judgment based on jurisdictional deficiencies. This conduct violated Appellant's right to a fair hearing and undermined the fairness of the legal process.

RELIEF REQUESTED

Petitioner respectfully requests that the Supreme Court of South Carolina grant this Petition for Writ of Certiorari and:

1. Review the decision of the Court of Appeals dismissing the appeal.
2. Provide clear instructions or remand the case to allow Appellant to amend or correct the Record on Appeal.
3. vacate the judgments of the lower courts, and remand the case with instructions to dismiss the Respondent's claims for lack of jurisdiction.
4. Alternatively, Petitioner requests that this Court order a new hearing to address the jurisdictional deficiencies and provide Petitioner with an opportunity to present evidence on the merits of the case.
5. Petitioner further requests any other relief that the Court deems just and proper.



Respectfully submitted,

DeWayne Sykes
Petitioner, Pro Se

Date: December 16, 2024

o

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity Judge

Case No. 2022-CP-10-03492
Appellate Case No.: 2023-001086
Supreme Court Case No.: 2024-002005

PVONE REO LLC

Respondent,

v.

Mary A. White et al,

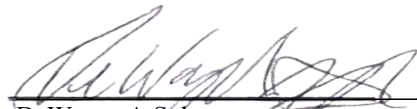
Appellant.

PROOF OF SERVICE

I certify that I have served the Notice John Dodds III, Stephen Peterson Groves, Kelly Woody by depositing a copy of it in the United States Mail, Postage prepaid, on November 27, 2024, addressed to its attorney of record, 858 Low county Bld ste, 101, Mt, Pleasant, South Carolina 29464, 25 Calhoun street, Suite 250 Charleston, South Carolina 29401 , and P.O. Box 6432, Columbia SC 29260.

December 16, 2024

Sincerely,



DeWayne A. Sykes
1953 Jacksonville road
N. Charleston, South Carolina 29405
(843) 478-5735
Appellant

LETTER TO THE APPELLATE COURT AND SUPREME COURT

CLERK FILING

December 16, 2024

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolin 29211

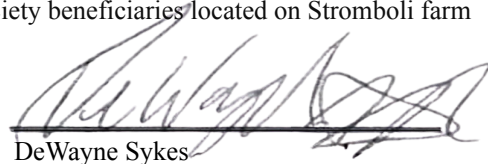
The Honorable Patricia A. Howard
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, South Carolin 29211

RE: PVone REO LLC v. Mary A White et al, Case No. 2022-CP-10-03492, Appellate
Case No.: 2023-001086, **Supreme Court Case No.: 2024-002005**

Dear CLERK:

Enclosed for filing is an Appellant REPLY PETITION FOR CERTIORARI, Certificate
of Service, on the respondent.

- (1) Appellant REPLY PETITION FOR CERTIORARI
- (2) Certificate of Service
- (3) The Sykes Letter
- (4) Mark Lehrer Letter
- (5) Registered mail to Master
- (6) Email to request transcript
- (7) Map of location of Stromboli farm
- (8) Map of the Brethren of love society ownership of part of Stromboli farm 1875
- (9) Map of assignments of Brethren of love society beneficiaries located on Stromboli farm
1875
- (10) Brethren of Love Society trust 1875



DeWayne Sykes
1953 Jacksonville Road
North Charleston, South Carolina 29405
(843) 478-5735
In Propria Persona

CC: John Dodds III
858 Low County Bld ste, 101, Mt, Pleasant, South Carolina 29464

Stephen Peterson Groves
25 Calhoun street, Suite 250 Charleston, South Carolina 29401

Kelly Woody
P.O. Box 6432, Columbia SC 29260

COFITACHIQUI

English Translation

BRETHREN OF LOVE SOCIETY

April 5, 2022
Attn. Mark Lehrer, Portfolio Manager
PINE VALLEY ONE REAL ESTATE, LLC
650 SE 12TH ST
Dania Beach, FL 33004

Re: 4660300154

Dear Sir or Madam:

This letter is to notify you that Mary A White is a Life Estate holder of a assignment on property located at 1953 Jacksonville Rd, North Charleston, SC Charleston County, South Carolina from the last will and testament of Frank White Sr. Mary A. White died in the year of 1997 at the time of her death the life Estate ended. 11/16/20 is 23 years after the ending of the life estate. Also PINE VALLEY ONE REAL ESTATE, LLC did not exist in The state of South Carolina until the day of 03/14/2022 it could not have done business in South Carolina in 11/16/2020.

Tax sale under an execution issued against one who is not the owner of the land is void. Donohue v. Ward, 298 S.C. 75, 378 S.E. 2d 261 (Ct.App.1989).

Sincerely,

DeWayne Sykes


Mrsykes79@gmail.com

From: Mark Lehrer
Sent: Thursday, April 21, 2022 9:36 AM
To: mrsykes79@gmail.com
Subject: 1953 JACKSONVILLE RD, NORTH CHARLESTON. 4660300154

Dear DeWayne Sykes:

I am in receipt of your letter dated April 5, 2022 in response to my letter to Mary A White.

After reviewing the records from the Tax Collector's office, it appears that Mary White has more than a life estate interest and that I have learned that the tax deed has been recorded. The Tax Collector's office advised me that the tax deed was recorded on April 7, 2022, in Book 1098, page 183. I looked at the Register of Deed's website, but the recorded tax deed is not yet available online.


According to Charleston County, Mary A White was conveyed more than a life estate and has fee simple interest title to the property. We researched this to determine if Mary White had a life estate interest, but it does not appear that is the case.

We are prepared to discuss this situation with the family or you. Please provide something in writing to me stating we can discuss the property with you.

I look forward to our conversation. Let me know a good telephone number and a good day and time for a call. Please confirm receipt of this email.

Thanks
Mark Lehrer
Portfolio Manager
Pine Valley One Real Estate

312.967.3425

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Master In Equite Attn: Mikell R. Scarborough 100 Broad St Ste 266 Charleston, SC 29401-2218	B. Received by (Printed Name) L.D. Noles	C. Date of Delivery 4-19-23
2. Article Number (Transfer from service label) RE 821 109 950 US	D. Is delivery address different from item 1? If YES, enter delivery address below: <input type="checkbox"/> Yes <input type="checkbox"/> No	
 9590 9402 8025 2305 7832 23	3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) <input type="checkbox"/> Priority Mail Express® <input checked="" type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9053		Domestic Return Receipt

Sent from my Galaxy

----- Original message -----

From: sykesd2000 <sykesd2000@yahoo.com>
 Date: 3/18/24 5:56 AM (GMT-05:00)
 To: jBoehm@charlestoncounty.org
 Subject: RE: Transcript hearing 3-04-2024 2022-CP-10-03492

Hello

I'm requesting a copy of the transcript for the hearing PVone reo
 llic v. Mary White 2022-CP-10-03492

Sent from my Galaxy

----- Original message -----

From: sykesd2000 <sykesd2000@yahoo.com>
 Date: 7/29/23 12:18 PM (GMT-05:00)
 To: "Josie A. Boehm"
 <JBoehm@charlestoncountv.org> JBoehm@charlestoncountv.org

by and having on the seventh day of April eighteen hundred and ^{eighty} twenty, have received all their right title and interest in and to the said property to R. G. Shaffer Trustee his heirs and assigns forever and whereas; all the parties now interested in the said property as tenants in common & for simple and direct of dividing the said real property among themselves in the way in which the property has been parcelled out between and among themselves by their mutual consent;

And whereas; John R. Fields who with and by the consent of the survivor of the property has been occupying a part of the land and is desirous of purchasing as much of the same as he now resides on.

Now know all men by these Presents, That we Lewis Jackson and his son, William R. Jackson, Jacob Johnson, Monday Green, John Edmonds, James Williams, Elias Proctor, Jack Burger, George Brinson, George Bennett, Adam Brown, Robert Bright, Richard Frasin, Jack Scott, William May, James Johnson, Nancy Whithamp, Daphne Williams, have granted, bargained, sold and released and by these Presents do Grant, Bargain, sell, and release for and in consideration of Five dollars to us in hand paid by Benjamin Hilda Shaffer at and before the execution of this deed, unto us above named

all those six Lots or parcels of Land each measuring and containing one acre more or less situated lying and being in the County of Charleston State aforesaid and known by the numbers twenty four (24) twenty five (25) twenty six (26) twenty seven (27) twenty eight (28) and twenty nine (29) on a plat made by the Honble Thomas date September 1875. Beginning and according to the North on road leading from West to East through the Wash, To the East on corner No 20, To the South on lands late of Col. Wade Hampton deceased and the Heirs Children of Jacob Hampton and to the West on public Road leading from Charleston to Columbia, N. E. corner Lot 20

all those six Lots or parcels of Land each measuring and containing one acre more or less situated lying and being in the County of Charleston state aforesaid and known by the numbers twenty (20) twenty one (21) twenty two (22) twenty three (23) twenty four (24) and twenty five (25) on a plat made by the Honble Thomas now Surveyor date September 1875 together with all and singular the Rights and the Easements and appurtenances to the said premises belonging or in anywise incident or appertaining To have and to hold all and singular the said premises together with all and singular the said Rights and

Shaffer has here and assigns for use to said mort-
gagor for the following interest and purposes, that is
to say, that the said Benjamin Gottschaffer
shall convey by and in fee simple to the persons be-
named in the recitation below stated.

- Lot No. 16. E. G. H. I. D. L. M. N. O. P. Q. R.
- L. J. K. in a plat made by Frederick J. Smith being
- as exhibited on November 1877 and plat being con-
veyed to this deed. To Harriet Jackson and
her son William B. Jackson Lot A in said plat con-
taining one half acre. To Daniel Jackson Lot B in
said plat containing one half acre. To Henry
Grew Lot C in said plat containing one acre
and also Lot D in said plat containing one half acre
To Peter Abraham Lot E in said plat containing one
acre and one half acre. To Frank Williams Lot F
in said plat containing one half acre. To
Mrs. W. in said plat containing one half acre. To
Jacob Karger Lot G in said plat containing one half acre
To George Simmons Lot H in said plat containing
one half acre. To Wm. Bennett Lot I in said plat
containing one half acre. To Abram Brown Lot
J in said plat containing one half acre. To Robert Bright
Lot K in said plat containing one half acre. To
Scott Lot L in said plat containing one half acre
To Alston May Lot M in said plat containing one half
acre. To Daniel Johnson Lot N in said plat containing
one half acre. To Nancy Winthrop and Monday Greenlee
Kin said plat containing one half acre. To Joseph
Williams Lot O in said plat containing one half acre
and To John R. Field Lot P in said plat containing
one half acre. And To B. G. Shaffer Trustee Lots Q & R
in said plat containing one half acre. The said lots being the property of the
persons whose names are signed to this deed.

And he binds in law as also in fact by the said Shaffer
himself to say to be conveyed by the said Shaffer
to any one whom the majority of the Reciters of the
party shall direct him in writing to convey

thence to a hand and across the street (i.e.) day of April
A. D. one thousand eight hundred and seventy eight (1878)
and in the 14th year of the sovereignty and Indepen-
dence of the United States of America.

Signed, sealed and delivered } Harriet Jackson (initials)
in the presence of } William B. Jackson (initials)
Charles Carrice } Daniel Jackson (initials)
Henry Abner } Monday Greenlee (initials)
} Peter Abraham (initials)
} Bennett Williams (initials)
} Charles Field (initials)
} Jacob Karger (initials)

← Bre
So

- George Simmons (seal)
- Wm. Bennett (seal)
- Wm. Brown (seal)
- Robert Bright (seal)
- Richard Brown (seal)
- Nick Smith (seal)
- Alston May (seal)
- Garrick Johnson (seal)
- Mary Thompson (seal)
- Prophet Williams (seal)

The State of South Carolina
 Charleston County }
 Charles C. Casper and made oath that he saw the
 within named Garrick Johnson then and there
 Daniel Johnson, Monday Green, Peter Flemming, Peter
 Williams, Elias Green, Jacob Kegan, George Simmons
 Wm. Bennett, Wm. Brown, Robert Bright, Richard
 Brown, Nick Smith, Alston May, Garrick Johnson, Mary
 Thompson & Prophet Williams, three of them who could
 not write making their oaths sign seal and as their
 aid and seal deliver the within written deed, and that he
 with H. M. Casper witnessed the due execution thereof
 on the 1st day of April A. D. 1857 Eighteen hundred

eighty
 C. C. Casper
 Notary Public

The State of South Carolina }
 Charleston County }
 Reincorporation of
 Town
 Charles C. Casper Notary Public do hereby certify that all
 whom it may concern that Mrs. Mary Green the wife of
 the within named Monday Green did this day appear
 for me and upon being privately and separately examined
 by me did declare that she was freely voluntarily and with
 out any compulsion deed or fear of any person or person
 whomsoever renounced, released and forever relinquish
 to the within named B. G. Schiffa her share and
 assigns all her interest and estate and also all her
 right and claim of dower in or to all and singular
 the premises within mentioned and record

Mary Green
 Given under my hand and seal this 1st day of
 April A. D. 1857 Eighteen hundred and eighty
 eight
 C. C. Casper
 Notary Public