

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM THE BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Circuit Court Judge

---

Appellate Case No. 2023-001519

---

James Reid and Sarania Reid,

Respondents,

v.

Carrie Gaston Henderson

Appellant.

---

APPENDIX

---

INDEX

1. Attachment Statement .....Page 3

2. Deed Prepared and Signed by Attorney Louis Dore .....Page 4

3. Recusal of Attorney Dor (2007) .....Page 6

4. Estate of Cecil Gaston (1949) .....Page 8

5. Title to Real Estate (1908) .....Page 9

6. Svalina, Richardson, and Smith (1994) .....Page 13

**Excerpts of Relevant Case Law**

A. Kriti Ripley, 404 S.C. 379, 746 S.E.2d 432 .....Page 15

B. Hartford Accident & Indem. Co., 201 S.C. 32, 21 S.E.2d 444 .....Page 15

C. Mid-State Distribs., Inc. v. Century Imps., Inc., 310 S.C. 330, 426 S.E.2d 777.....Page 16

6 of 16

## ATTACHMENT

ALL that certain piece, parcel or lot of land situate, lying and being in Beaufort County, State of South Carolina, and is shown and designated on that certain plat prepared for Doris and Alex Green by Gasque and Associates, Inc., dated February 9, 1995, and revised on May 9, 2000 and December 17, 2004, and is shown on said plat as being the property of "Harold Green", containing 22 acres. For a more complete and accurate description as to the metes, bounds, courses and distances reference may be had to said plat, which is recorded in the office of the RMC for Beaufort County at Plat Book 103, Page 182.

This is the same parcel of land which was the subject of an Order signed by Thomas Kemmerlin, Jr. as Master In Equity for Beaufort County, dated February 20, 1998, at Judgment Roll 89191, and was conveyed to the Grantors herein by Corrective Limited Warranty Deeds of Thomas Kemmerlin, Jr., Master In Equity on May 9, 2002. Said deed is recorded in the office of the RMC for Beaufort County at Deed Book 1579, Page 1037.

Reference: District 600, Map 10, Parcel 115.

This Deed prepared by Louis O. Dore of Dore Law Firm, P.A., 133 Sea Island Parkway, Lady's Island, SC 29907.

Grantees' mailing address: 4201 Sandy Lake Drive  
Lithonia, GA 30038

---

Book2079/Page469

4 of 16

4/10 RB  
Tupper 7002  
587 Feb  
2005

BEAUFORT COUNTY SC - ROD  
BK 02070 PGS 0488-0489  
FILE NUM 2005001405  
01/08/2005 09:48:13 AM  
REC'D BY B BING RCPT# 200497  
RECORDING FEES 10.00  
County Tax 242.00  
State Tax 572.00

RECORDED  
2005 FEB 02 10 58 AM  
Shirley O. Smith  
BEAUFORT COUNTY ALBANY

ELECTRONICALLY FILED - 2020 Sep 21 9:54 AM - BEAUFORT - COMMON PLEAS - CASE#2020CP0701507

STATE OF SOUTH CAROLINA )  
COUNTY OF BEAUFORT ) TITLE TO REAL ESTATE

KNOW ALL MEN BY THESE PRESENTS THAT CAROLYN TRIMBLE AND ANTHONY KEITH MURRELL GREEN in the State aforesaid for and in consideration of the sum of TWO HUNDRED TWENTY THOUSAND AND NO/100 (\$220,000.00) DOLLARS, to us in hand paid at and before the sealing of these presents by CUNNINGHAM REAL ESTATE MANAGEMENT, INC. AND LEON GOODRUM AS TENANTS IN COMMON in the State aforesaid, for which the receipt whereof is hereby acknowledged, have granted, bargained, sold and released and by these presents do grant, bargain, sell and release unto the said CUNNINGHAM REAL ESTATE MANAGEMENT, INC. AND LEON GOODRUM AS TENANTS IN COMMON, the following described property, to-wit:

"SEE ATTACHMENT"

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises belonging, or in anywise incident or appertaining TO HAVE AND TO HOLD, all and singular, the said Premises before mentioned unto the said CUNNINGHAM REAL ESTATE MANAGEMENT, INC. AND LEON GOODRUM AS TENANTS IN COMMON, their successors and assigns forever.

AND we do hereby bind ourselves and our heirs, executors, successors and assigns, to warrant and forever defend, all and singular, the said premises unto the said CUNNINGHAM REAL ESTATE MANAGEMENT, INC AND LEON GOODRUM AS TENANTS IN

ADD GMP Record 1/29/2005 03:24:46 PM  
BEAUFORT COUNTY TAX MAP REFERENCE  
Dist Map SMap Parcel Block Week  
R600 010 000 0115 0000 C0

Book2079/Page466

5 of 16

COMMON to warrant and defend, ali and singular, the said premises unto the said  
**CUNNINGHAM REAL ESTATE MANAGEMENT, INC. AND LEON GOODRUM AS**  
TENANTS IN COMMON against us and our heirs, successors and assigns and all persons  
whomsoever lawfully claiming or to claim the same or any part thereof.

WITNESS our hands and seals this 20<sup>th</sup> day of December in the year of our  
Lord two thousand four (2004) and in the two hundred and twenty-eighth year of the  
Sovereignty and Independence of the United States of America.

SIGNED, SEALED AND DELIVERED  
IN THE PRESENCE OF:

Marge C. Mack  
signature of 1st witness  
[Signature]  
signature of 2<sup>nd</sup> witness (Notary)

[Signature]  
CAROLYN TREMBLE

[Signature]  
ANTHONY KEITH MURRELL GREEN

ELECTRONICALLY FILED - 2020 Sep 21 8:54 AM - BEAUFORT - COMMON PLEAS - CASE#2020CP0701507

**RECEIVED**

**Jan 27 2025**

**SC Court of Appeals**

**FORM 7  
PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Honorable Marvin Dukes III, Circuit Court Judge

Case No. 2023-001519

James Reid,

Respondent,

v.

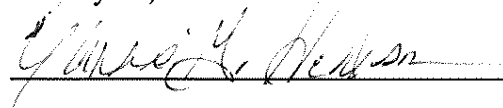
Carrie G. Henderson,

Appellant.

**PROOF OF SERVICE**

I certify that I have served the Notice of Appeal on Attorney Chereese Chisolm Handy, Attorney Thurmond Kirchner & Timbes P.A., James & Sarania Reid by depositing a copy of it in the United States Mail, postage prepaid, on January 25, 2024, addressed to the Appeals Court 1220 Senate St, Columbia, SC 29201.

January 25, 2024



s/ Carrie G.  
Henderson  
Carrie G.  
Henderson, Pro  
Se



# THE UPS STORE

463 Johnny Mercer Blvd Ste b7  
Savannah , Ga 31410  
912.898.7800 Tel  
912.898.7802 Fax  
store3913@theupsstore.com  
theupsstore.com/3913

## Fax

To The South Carolina Courts of Appeal

Company \_\_\_\_\_

Fax number 803-734-1839

Date Jan. 27, 2025

Job number \_\_\_\_\_

From Carrie Master Henderson

Phone number 912-200-1285

Fax number \_\_\_\_\_

Total pages 23