

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

JUN 12 2025

APPEAL FROM GREENVILLE COUNTY
PERRY H. GRAVELY, CIRCUIT COURT JUDGE

SC Court of Appeals

Appellate Case No. 2025-000366
Civil Action No. 2022-CP-23-04055

Stacey Grist as Agent under a Power of Attorney for
Stanford W. Grist and as Trustee of the Second Amended
Trust of Stanford W. Grist living Trust dated December 5, 2005,
Stanford Grist Veterinary Services, LLC, Chestnut Ridge Farm, LLC,
And Hilly Street, LLC,.....Appellant,

v.

Priscilla Mickie Grist, Caroline York Grist Lyon,
Leyland H. Lyon, Jr., Jennifer Browning, Browning
Geriatrics Consulting, LLC, Tracy Parson, Kiki's Kare, LLC
d/b/a Comfort Keepers, Erin Couchell Individually and as a
member of Kiki's Kare, Chris Couchell individually and as a
member of Kiki's Kare, LLC, and Kerry Burnett McCreary, Defendants,

Of which Jennifer Browning, Browning Geriatrics Consulting, LLC,
Tracy Parsons, Kiki's Kare d/b/a Comfort Keepers, Erin Couchell
Individually and as a member of Kiki's Kare, Chris Couchell
Individually and as a member of Kiki's Kare, LLC are the, Respondents.

Appellant's Designations

Pursuant to Rule 209, SCRCR comes now Stacey Grist as Agent under a Power of Attorney for Stanford W. Grist and as Trustee of the Second Amended Trust of Stanford W. Grist living Trust dated December 5, 2005, Stanford Grist Veterinary Services, LLC, Chestnut Ridge Farm, LLC, and Hilly Street, LLC (collectively “Appellant”) and proposes that the following matter be included in the record on appeal, which undersigned counsel certifies contains no matter irrelevant to the appeal. Appellant reserves the right to designate additional materials in connection with their initial reply brief. Unless otherwise stated, all documents designated shall include all exhibits filed with the original filing, while excluding proofs of service and cover sheets.

- **Orders:**

- July 13, 2020, *Ex Parte* Order of Appointment
- Probate Court Order of Appointment – Tracy Parsons
- Probate Court Order of Appointment – Jennifer Browning
- 08/09/2024 Order on Respondent Parsons’ and Browning’s Motion for Order of Protection
- 08/09/2024 Order on Respondent Kiki’s Care, LLC’s Motion to Sever
- 09/11/2024 Order Denying Appellant’s Motion to Stay
- 01/15/2025 Order on Appellant’s Motion to Compel Deposition of Prescilla
- 1/30/2025 Order Denying Appellant’s Motion to Alter and Amend – Respondent Browning
- 1/30/2025 Order Denying Appellant’s Motion to Alter and Amend – Respondent Parsons

- 01/30/2025 Order Denying Appellant's Motion to Alter and Amend – Respondent Kiki's Care, LLC
- Probate Court Order Approving Fees for Jennifer Browning
- **Judgments**
 - 01/06/2025 Order Granting Respondent Parson's Motion for Summary Judgment
 - 01/06/2025 Order Granting Respondent Browning's Motion for Summary Judgment
 - 01/06/2025 Order Granting Respondent Kiki's Care, LLC's Motion for Summary Judgment.
- **Pleadings**
 - 07/9/2020 Petition for Guardianship
 - 08/01/2022 Summons and Complaint
 - 08/15/2022 Amended Summons and Complaint
 - Answers to Amended Summons and Complaint from each Defendant
 - 01/29/2024 Second Amended Summons and Complaint
 - Answers to Second Amended Summons and Complaint
 - 02/27/2024 Original Notice of Deposition to Respondent Parsons
 - 09/12/2024 Notice of Deposition to Respondent Parson's
 - Answer of Jennifer Browning filed in Laurens County Probate
- **Transcripts and Depositions:**
 - 10/09/2024 Depo. of Respondent Parsons
 - 10/16/2024 Summary Judgment Transcript
 - Depo. of Presilla Mickie Grist

- Depo. of Respondent Browning
- Depo of Christopher Couchell
- Depo. Of Stacey Grist
- Depo. Of Kerri McCreary
- **Motions and Other Papers:**
 - 05/21/2024 Motion for Order of Protection – Respondent Parsons
 - 08/02/2024 Motion to Stay – Appellant
 - 09/06/2024 Appellant’s Memo. in Opp. To Respondent Kiki’s Care, LLC’s Motion for Summary Judgment.
 - 09/09/2024 Memo. in Support of Summary Judgment for Respondent Kiki’s Care, LLC
 - 09/23/2024 Motion to Alter and Amend Order Denying Appellant’s Motion to Stay
 - 10/11/2024 Memo. in Support of Summary Judgment for Respondent Jennifer Browning
 - 10/15/2024 Memo. in Support of Summary Judgment for Respondent Tracy Parsons
 - 10/15/2024 Appellant’s Memo. in Opp. To Respondent Parson’s Motion for Summary Judgment.
 - 10/28/2024 Appellants Memo. in Opp. To Respondent Browning’s Motion for Summary Judgment
 - 11/26/2024 Rule 56(f) Affidavit to Respondent Browning
 - 11/26/2024 Rule 56(f) Affidavit to Respondent Parsons

- 11/26/2024 Rule 56(f) Affidavit to Respondent Kiki's Care, LLC
- 12/06/2024 Motion to Compel Deposition of Prescilla Mickie Grist
- 01/16/2025 Motion to Alter and Amend Grant of Summary Judgment – Respondent Parsons
- 01/16/2025 Motion to Alter and Amend Grant of Summary Judgment- Respondent Kiki's Care, LLC
- 01/16/2025 Motion to Alter and Amend Grant of Summary Judgment – Respondent Browning
- 02/05/2025 Motion to Alter and Amend
- **Other Miscellaneous Material**
 - Comfort Keepers Client Care Agreement/ Contract
 - Guardian Ad Litem Report
 - Addendum to Guardian Ad Litem Report
 - Emails to and from Respondent Prescilla Mickie Grist
 - Fee Affidavit of Jennifer Browning
 - Guardian Oath

Dated this 6th day of June, 2025.

TRULUCK THOMASON, LLC

s/Kimberly T. Thomason

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member of Kiki's Kare, Chris Couchell individually and as a
member of Kiki's Kare, LLC, and Kerry Burnett McCreary, Defendants,

Of which Jennifer Browning, Browning Geriatrics Consulting, LLC,
Tracy Parsons, Kiki's Kare d/b/a Comfort Keepers, Erin Couchell
Individually and as a member of Kiki's Kare, Chris Couchell
Individually and as a member of Kiki's Kare, LLC are the, Respondents.

Proof of Service

Comes now undersigned counsel, a member of this Court's bar, and states that he served
the Joint Initial Brief of Appellant, Appellant's Designation of Record Matter, and this proof of
service, this 6th day of June, 2025 via email on the following attorney's:

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Dated this 6th day of June, 2025.

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June 9, 2025

South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED

Re: Stacey Grist, et al. v. Priscilla Mickie Grist, et al.
Case no.: 2025-00366

JUN 12 2025

SC Court of Appeals

Dear Clerk,

Enclosed find Joint Initial Brief, Designation of Matter, as well as a Proof of Service for the same, as it relates the case above mentioned.

Should you have any questions, feel free to contact our office.

Very Respectfully,

TRULUCK THOMASON, LLC

Brandi Larobardiere

Paralegal

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