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SC Court of Appeals

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.

MOTION TO CORRECT AND SUPPLEMENT THE RECORD ON APPEAL

COME NOW the Respondents, James and Sarania Reid, and herewith move this Court to permit Respondents to supplement the Record on Appeal (the “Record”). In support of this Motion, Respondents herewith show unto this Honorable Court as follows:

1. In their Designation of Matter, Respondents designated two items: (i) the Answer/Letter filed Sept. 21, 2020 (“**Exhibit A**” hereto), and (ii) the Notice of Hearing re: Motion for Summary Judgment filed April 13, 2023 (“**Exhibit B**” hereto).

2. When Appellant filed the Record on Appeal, the two items referred to above were inadvertently omitted from the Record.

3. To enable the parties to fully refer to the materials designated to be included in the Record when completing their respective Final Briefs, Respondents request that the Court

direct Appellant to include the two one-page items attached hereon as **Exhibit A** and **Exhibit B** in the Record.

4. Respondents further request that this Court hold in abeyance the due date for the filing of Final Briefs until such time as this Motion is ruled upon and the Record is supplemented if the Motion is granted.

WHEREFORE Respondents respectfully request an Order from this Court granting Respondents Motion to Supplement the Record with the Answer/Letter filed September 21, 2020. Respondents further request that this Court hold in abeyance due date for the filing of their Final Brief until such time as this Court has ruled upon this Motion.

Respectfully submitted,

THURMOND KIRCHNER & TIMBES, P.A.



s/_____
Michael A. Timbes, Bar No. 69730
15 Middle Atlantic Wharf
Charleston, South Carolina 29401
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Fax: 843-937-4200
Email: michael@tktlawyers.com
Attorney for Respondents

EXHIBIT A

316 East 35th Street

Savannah, GA. 31401

Sept. 5. 2020

To the Court of Commom Pleas

Civil Action No. 2020-CP-0701507

This is a complaint concerning land that I, Carrie Gaston Henderson, own and there is an attempt to illegally take my land away from me. The land in question is 60 Gaston Plantation Road, Okatie, S.C 29910. I have the original deed to this land and I am sending a copy.(See Enclosed).

The deed that James Reid and Sarania Reid have, cannot be a legal deed because Attorney Dore forged information on said deed.

My great grand parents, Cain Knox and Sinda Knox bought the 41, plus 74 acres of land in question and this land has been in my family every since. I have the original deeds and I am sure that someone other than me knows that the deeds were illegally altered and sold to make a profit. That someone is Attorney Dore and others who illegally altered the deed and sold land.

Attorney Louis O. Dore was my father, Cicil J. Gaston's attorney on the quiet title Action during the years of 1981-1982. (During this time timber was cut and sold.) As Attorney Dore was my Father's attorney, he should not have been allowed to work with Cunningham Real Estate. Dore was also the attorney for my three cousins, Doris Green, Willis Floyd and Joe Louis Green, Jr. Fact remain how can Dore move from one person to another so quickly. When I realized this, I asked the court to remove Dore from this case and my request was granted because of conflict of interest. (See copy of this request and copy of judge's request was granted) Nevertheless, Dore had already changed the deed and sold the land and now I am trying to save my land with very little help from the court system because of previous illegal actions.

I want an impartial attorney to review my case and do the right thing so that all parties will have justice and peace.

Sincerely,

Carrie Gaston Henderson



EXHIBIT B

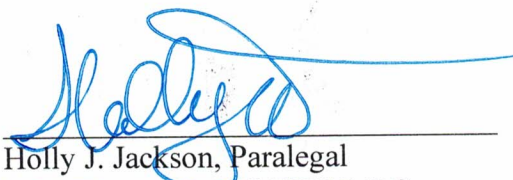
STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF BEAUFORT)	CIVIL ACTION NO. 2020-CP-07-01507
)	
JAMES REID AND SARANIA REID)	NON-JURY
)	
Plaintiff(s),)	
)	NOTICE OF HEARING
vs)	
)	
CARRIE GASTON HENDERSON)	
)	
Defendant(s).)	

Please be advised, a hearing has been scheduled in the above-caption matter before The Honorable Marvin Dukes, III, Beaufort County Master In Equity and Special Circuit Court Judge, on Plaintiff's Motion for Summary Judgment on May 15, 2023, at 1:30 pm. The hearing will be conducted in person.

I hereby certify that I have deposited on this date in the US Mail, with proper first-class postage attached, a copy of this hearing notice, to the Defendant above at the following address:

Carrie Gaston Henderson
316 East 35th Street
Savannah, GA 31401

Respectfully submitted by,



Holly J. Jackson, Paralegal
HERITAGE LAW FIRM, PC
ATTORNEY FOR THE PLAINTIFF
 1011 Bay Street,
 Suite 2B
 Beaufort, South Carolina 29902
 Phone: (843) 894-6998

April 13, 2023
 Beaufort, South Carolina

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Appellant.

PROOF OF SERVICE

I, hereby certify that the enclosed was served on the parties stated below by depositing a copy of the same in the U.S. Mail:

Carrie G. Henderson *pro se*
316 East 35th St.
Savannah, GA 31401

This 2nd day of July, 2025.

THURMOND KIRCHNER & TIMBES, P.A.

BY: Kaitlyn Nobles
Kaitlyn Nobles
Paralegal