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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Honorable Curtis L. Coltrane, Special Referee

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Case No.: 2024-001725

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Debbie D. Frazier, Plaintiff,

v.

The Heirs at Law of Fred Bolden, Denolis T. Polite, Adan Castillo Nava, Ivone Trejo Guevara, Ethel P. Brown, and all others unknown having or claiming to have any right, title, estate or interest in or lien upon the real property described in the Complaint herein, being designated collectively as John Doe and Sarah Rode; including all persons who may be deceased, minors, in the Armed Forces of the United State, Non Compos Mentis, and who may be wider any other disability, who might have or claim to have any right, title, estate, interest in or lien upon the real property described in the Complaint herein, Defendants,

of whom Racquel Bolden-Lott is the Appellant.

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**MOTION FOR APPELLANT TO AMEND THE RECORD ON APPEAL AND TO  
INCLUDE RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED ON  
APPEAL**

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Respondent files this motion asking for an order requiring the Appellant to amend the Record on Appeal on two grounds: 1) for Appellant to comply with Rule 210, SCRAP by numbering the pages of the Record on Appeal consecutively beginning with the index and as otherwise as required by Rule 210, and 2) to include Respondent's Designation of Matter to be Included on Appeal which was inadvertently omitted when filing her Initial Brief, although citations were properly noted in Respondent's Initial Brief. Respondent proposes the following to be included in the Record on Appeal:

1. Judgment and Final Order of Curtis Coltrane, Special Referee, dated September 13, 2024.
2. Complaint filed on September 14, 2022.
3. Answer filed December 21, 2022.

4. Trial Transcript pages 26, 27, 28, 29,30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 43, 44, 46, 47, 48, 49, 50, 51, 52, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 93, 94, 95, 96, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 119, 120, 121, 140, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 173, 174, 182, 183.
5. Plaintiff's Exhibits 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11.
6. Defendant's Exhibit 2.

Beaufort County, South Carolina  
8<sup>th</sup> day of July, 2025

Racquel Bolden-Lott  
1925 North Laura Street  
Jacksonville, FL 32206  
(904)343-2630  
Appellant Racquel Bolden-Lott, Pro-se

Respectfully Submitted,

EVERSOLE LAW FIRM, P.C.

By:   
Alysoun M. Eversole, SC Bar #0068011  
1509 King Street  
Beaufort, SC 29902  
Telephone (843)379-3333  
[aeversole@eversolelaw.com](mailto:aeversole@eversolelaw.com)  
Attorney for Respondent Debbie F. Frazier

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of whom Racquel Bolden-Lott is the Appellant.

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**PROOF OF SERVICE**

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The undersigned counsel herby certifies that she has served the foregoing Motion for Appellant to Amend the Record on Appeal and to include Respondents Designation of Matter to be included on Appeal, upon Appellant, Pro-se by affixing same with proper postage and placing same with the United States Postal Service on the 8<sup>th</sup> day of July, 2025 addressed to the following:

Racquel Bolden-Lott  
1925 North Laura Street  
Jacksonville, FL 32206  
(904)343-2630  
Appellant Racquel Bolden-Lott, Pro-se

[SIGNATURE ON FOLLOWING PAGE]

Respectfully Submitted,

EVERSOLE LAW FIRM, P.C.

By: 

Alysoun M. Eversole, SC Bar #0068011

1509 King Street

Beaufort, SC 29902

Telephone (843)379-3333

[aeversole@eversolelaw.com](mailto:aeversole@eversolelaw.com)

Attorney for Respondent Debbie D. Frazier

The 8<sup>th</sup> day of July, 2025