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Jul 14 2025

SC Court of Appeals

THE SOUTH CAROLINA COURT OF APPEALS

Debbie D. Frazier, Plaintiff,

v.

Appellant Case No.: 2024-001725

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.

**RESPONSE TO MOTION FOR APPELLANT
TO AMEND RECORD ON APPEAL**

Appellant Racquel Bolden-Lott, pro se, pursuant to Rule 210, South Carolina Appellate Court Rules, hereby responds to Respondent Debbie Frazier's *Motion for Appellant to Amend the Record on Appeal and to Include Respondent's Designation of Matter to Be Included on Appeal* dated July 8, 2025, and states:

1. In the *Motion for Appellant to Amend the Record on Appeal and to Include Respondent's Designation of Matter to Be Included on Appeal*,

Respondent Debbie Frazier requested that Appellant Racquel Bolden-Lott amend the record on appeal to include various documents.

2. On about July 2, 2025, Appellant Racquel Bolden-Lott sent by U.S. Priority Mail to the Clerk of the South Carolina Court of Appeals original (bound

and unbound copies) of the *Record of Appeal - Volume 1*, *Record on Appeal - Volume 2* and *Final Initial Brief of Appellant*. All pages of the *Record on Appeal* were numbered in chronological order from page 1 through page 390.

Furthermore, in compliance with Clerk's letter of May 27, 2025¹, requesting from Appellant and "all other parties" original "final brief(s)" and an electronic or "unbound paper" copy, the Appellant in preparing the *Final Initial Brief of Appellant*, amended the *Initial Brief of Appellant* to contain the correct references to the pages of the above *Record on Appeal*. Also, on July 10, 2025, Appellant Racquel Bolden-Lott prepared, and sent to the Clerk for filing, the *Reply Brief of Appellant* to contain the correct references to the pages of the above *Record on Appeal*.

3. Consequently, because the *Record of Appeal - Volume 1* includes the various documents listed in Respondent Debbie Frazier's *Motion for Appellant to Amend the Record on Appeal and to Include Respondent's Designation of Matter to Be Included on Appeal*, and because Appellant Racquel Bolden-Lott has filed the *Final Initial Brief of Appellant* and the *Reply Brief of Appellant*, both containing the correct references to the pages of the above *Record on Appeal*, the Respondent's motion must be denied and Respondent should be ordered to file a

¹ The Clerk's Letter of May 27, 2025, is attached hereto as Exhibit "A."

“*Final Initial Brief of the Respondent*” containing the correct references to the pages of the above *Record on Appeal* in compliance with the Clerk’s letter of May 27, 2025.

4. WHEREFORE, Appellant Racquel Bolden-Lott, pro se, respectfully requests that the South Carolina Court of Appeals deny Respondent Debbie Frazier’s *Motion for Appellant to Amend the Record on Appeal and to Include Respondent's Designation of Matter to Be Included on Appeal*.

Respectfully Submitted,

/s/ Racquel Bolden Lott
Racquel Bolden-Lott, Pro Se, Appellant
1925 North Laura Street
Jacksonville, Florida 32206
(904) 904-343-2630

Dated: July 14, 2025

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CERTIFICATE OF SERVICE

I hereby certify that the following person has been provided with the above document by Email and U.S. Mail to:

Alysoun M. Eversole, Attorney
(aeversole@eversolelaw.com)
1509 King Street
Beaufort, South Carolina 29902

/s/ Racquel Bolden-Lott
Racquel Bolden-Lott, Pro Se, Appellant

Exhibit “A”



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

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May 27, 2025

Racquel Bolden-Lott
1925 Norht Laura St
Jacksonville FL 32206

Ms. Alysoun M Eversole, Esquire
1509 King Street
Beaufort SC 29902

Re: Debbie D. Frazier v. The Heirs at Law of Fred Bolden
Appellate Case No. 2024-001725

Dear Counsel and Ms. Bolden-Lott:

The Court has determined a need exists for one (1) bound copy of the record on appeal and all final briefs. The additional copies must comply with the binding and cover color requirements specified by Rule 267 of the South Carolina Appellate Court Rules (SCACR).

Accordingly, the appellant(s) must file an original record on appeal and final brief(s), in either electronic or unbound paper form, as well as one (1) bound paper copy of each. All other parties must file an original final brief and one (1) bound paper copy. **The bound copies are due to be served and filed at the same time as the original record on appeal and final briefs.**

The correct caption for this appeal should read as follows on the record on appeal and all final briefs:

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.

We request large parcels such as bound paper copies of the record on appeal and all final briefs be sent directly to the Court via the street address: **1220 Senate Street, Columbia, SC 29201.**

Very truly yours,

A handwritten signature in blue ink that reads "Catherine Hannissai, deputy". The signature is written in a cursive style.

CLERK