

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas
Frank R. Addy, Jr., Circuit Court Judge
2012-CP-30-208

70228

Edward D. Sullivan, as Personal Representative
of the Estate of Marion M. Kay, Appellant/
Cross-Respondent

v.

Martha Brown and Mary Moses, Respondent/
Cross-Appellant

NOTICE OF CROSS-APPEAL

Martha Brown and Mary Moses appeal the Orders of the Honorable Frank R. Addy, Jr. dated September 30, 2013 and August 20, 2013 and the orders of The Honorable Donald B. Hocker, dated May 24, 2011 and March 27, 2012. Appellant received written notice of the entry of the final Circuit Court Order on October 1, 2013 and notice of Mr. Sullivan's appeal on October 25, 2013. The undersigned agrees that the orders attached to Appellant's Notice of Appeal are those under consideration and incorporates them by reference.

COX, FERGUSON & WHAM
Attorneys for the Appellant

RECEIVED
OCT 30 2013
SC Court of Appeals

By: John R. Ferguson
John R. Ferguson
S.C. Bar No. 1987
107 W. Laurens St. - PO Box 286
Laurens, SC 29360
(864) 984-2126
Fax (864) 984-7372

October 28, 2013

Other Counsel of Record Is:

Daryl G. Hawkins, Esq.
Attorney at Law
P.O. Box 11906
Columbia, SC 29122
(803) 733-3531

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas
Frank R. Addy, Jr., Circuit Court Judge
2012-CP-30-208

Edward D. Sullivan, as Personal Representative
of the Estate of Marion M. Kay, Appellant/
Cross-Respondent

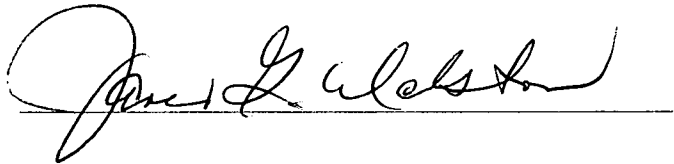
v.

Martha Brown and Mary Moses, Respondent/
Cross-Appellant

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox
Ferguson & Wham LLC and that on the 29th day of October,
2013 she served the Notice of Cross-Appeal herein by
depositing a copy of it in the United States Mail, postage
prepaid and addressed to:

Daryl G. Hawkins, Esq.
Attorney at Law
P.O. Box 11906
Columbia, SC 29211.



October 29, 2013

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas
Frank R. Addy, Jr., Circuit Court Judge
2013-002319

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SC Court of Appeals

In the Matter of the Estate of Marion M. Kay
Martha Brown and Mary Moses, Appellants
v.
Edward D. Sullivan, as Personal Representative
of the Estate of Marion M. Kay, Respondent

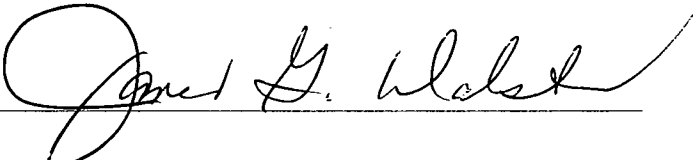
CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox
Ferguson & Wham, LLC and that on the 15th day of November,
2013 she served the Amended Notice of Appeal herein by
depositing a copy of it in the United States Mail, postage
prepaid and addressed to:

The Hon. Frank R Addy, Jr.
Circuit Court Judge
528 Monument St., Rm. 210
Greenwood, SC 29646

Associate Probate Judge
Laurens County Probate Court
P.O. Box 972
Laurens, SC 29360.

November 15th, 2013



COX, FERGUSON & WHAM, LLC

ATTORNEYS AT LAW
107 E. Laurens St.
P.O. Box 286
LAURENS, SOUTH CAROLINA 29360-0286

W. REID COX, JR.
JOHN R. FERGUSON
ALLEN M. WHAM

RECEIVED
PHONE: (864) 984-2126
FAX: (864) 984-7372
E-MAIL: jrf@backroads.net

November 4, 2013

NOV 05 2013

SC Court of Appeals

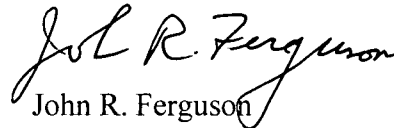
Office of the Clerk of Court
S.C. Court of Appeals
1015 Sumter St.
Columbia, SC 29201

Re: In the Matter of the Estate of Marion M. Kay, 2013-002319

Gentlemen:

Please file the enclosed Certificate of Service and return to me a clocked copy in the envelope provided. Thank you for your help.

Sincerely,


John R. Ferguson

JRF/wp
CC: Daryl G. Hawkins, Esq.

COX, FERGUSON & WHAM

ATTORNEYS AT LAW
107 E. Laurens St.
P.O. Box 286
LAURENS, SOUTH CAROLINA 29360-0286

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October 29, 2013

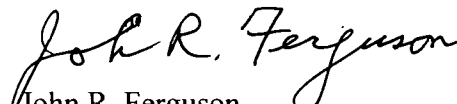
Office of the Clerk of Court
S.C. Court of Appeals
1015 Sumter St.
Columbia, SC 29201

Re: Sullivan etc. v. Brown, et al., 2012-CP-30-00258

Gentlemen:

With this letter I am enclosing for filing an original Notice of Cross-Appeal and proof of service on opposing counsel. I am in addition enclosing a check for the \$ 100 filing fee. Please return a clocked copy of the notice to me in the envelope provided. Because the Appellant has already provided a copy of the orders under appeal, I have not duplicated that effort. If you do want me to provide you with a second copy of those orders, please let me know.

Sincerely,


John R. Ferguson

JRF/wp
Encl.
CC: Daryl G. Hawkins, Esq.

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OCT 30 2013

SC Court of Appeals

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From: (864) 984-2126
John R. Ferguson, Esq.
Cox Ferguson & Wham LLC
107 E. Laurens St.
Laurens, SC 29360

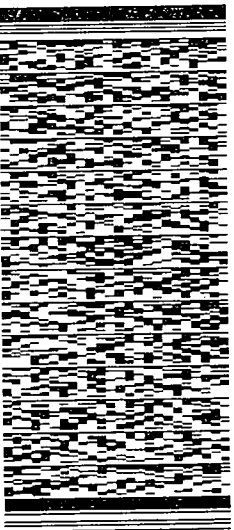
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S.C. COURT OF APPEALS
1015 Sumter St.
COLUMBIA, SC 29201

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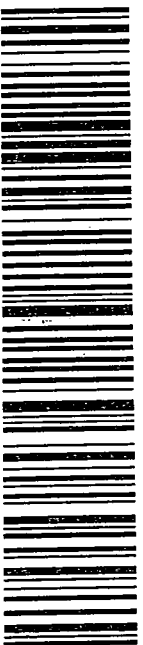
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