

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 29<sup>th</sup> 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

**RECEIVED**  
OCT 30 2013  
**SC Court of Appeals**



**COX, FERGUSON & WHAM, LLC**

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LAURENS, SOUTH CAROLINA 29360-0286

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

PHONE: (864) 984-2126  
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E-MAIL: [jferg@backroads.net](mailto:jferg@backroads.net)

October 30, 2013

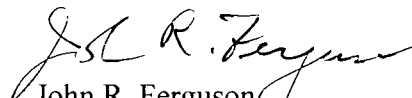
Office of the Clerk of Court  
S.C. Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

Re: Sullivan v. Brown, et.al., 2012-CP-30-0258

Gentlemen:

With this letter I am enclosing for filing a Certificate of Service for the above-referenced case. Please file the original and send me a clocked copy in the envelope provided. Thank you for your help.

Sincerely,

  
John R. Ferguson

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

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OCT 31 2013

**SC Court of Appeals**

**COX, FERGUSON & WHAM**

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October 29, 2013

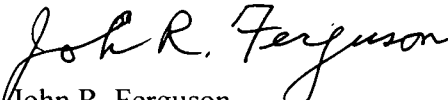
Office of the Clerk of Court  
S.C. Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

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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SC Court of Appeals



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John R. Ferguson, Esq.  
Cox, Ferguson & Wham LLC  
107 E. Laurens St.  
Laurens, SC 29360

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S.C. COURT OF APPEALS  
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COLUMBIA, SC 29201

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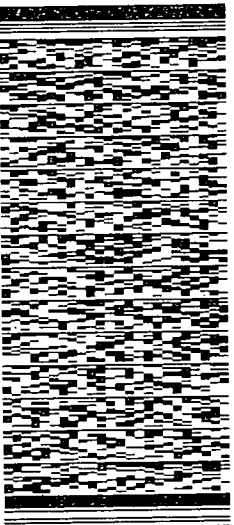
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Invoice #  
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Dept #

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COX & FERGUSON, ATTYS

002/002

2012-CP 30-258

THE STATE OF SOUTH CAROLINA  
In the Court of Common Pleas

APPEAL FROM LAURENS COUNTY  
Probate Court

Donald B. Hocker, Associate Probate Judge

Mary M. Moses and Martha M. Brown. . . . . Appellants

Notice is hereby given that Mary M. Moses and Martha M. Brown appeal the Final Order of the Honorable Donald B. Hocker dated May 24, 2011 and received by the Appellants on May 25, 2011 and the Order Disposing of Post-Trial Motions dated March 27, 2012, which the Appellants received on March 29, 2012.

LAURENS COUNTY  
COURT OF COMMON PLEAS  
2012 APR -4 P 12:20  
IVAN W. ANASTASOFF

COX & FERGUSON  
Attorneys for the Appellants

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John R. Ferguson  
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April 4, 2012

Other Counsel of Record:

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(803) 799-9581  
Fax (803) 799-2011  
Attorney for Bart Heard

To: Amelia

734-1496

From: Law Office of  
Daryl G. Hawkins