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**Dec 10 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Master-in-Equity

The Honorable Mikell R. Scarborough

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Common Pleas Case No.: 2023-CP-10-00192  
Appellate Case No.: 2025-001402

Katie Lynn Mallace and Micah James Mallace, Respondents,

v.

Southeastern Capital Corporation; Krista Brown-Penney, Co-Trustee, EM Family Trust; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as a portion of Third Street shown on a plat recorded in the Office of the RMC for Charleston County in Plat Book D at Page 180, Charleston County, South Carolina, TMS# 999-00-00-366 formerly known as TMS# 514-09-00-047, their heirs and assigns, and all other persons, firms, or corporations entitled to the claim under, by or through the above-named Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon, the real estate described as a portion of Third Street shown on a plat recorded in the Office of the RMC for Charleston County in Plat Book D at Page 180, Charleston County, South Carolina, TMS# 999-00-00-366 formerly known as TMS# 514-09-00-047, Defendants, of which EM Family Trust, David M. Bolach, and Terri Davis are the Appellants.

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**CERTIFICATE OF SERVICE**

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I hereby certify that on this 10<sup>th</sup> day of December 2025, I hereby served a true and correct copy of Appellant's Initial Brief and Appellant's Designation of Matter to be included in the record on appeal upon the following parties via electronic mail at the addresses shown below:

Carlisle Allen  
Haynesworth Sinkler Boyd  
[callen@hsblawfirm.com](mailto:callen@hsblawfirm.com)

A. Parker Barnes, III  
Haynesworth Sinkler Boyd  
[pbarnes@hsblawfirm.com](mailto:pbarnes@hsblawfirm.com)

*/s/ Paul B. Ferrara, III*  
Paul B. Ferrara, III  
S.C. Bar No. 70511  
8887 Old University Blvd.  
North Charleston, SC 29406  
(843) 569-5511  
*Attorney for Appellants*

December 10, 2025

**FERRARA LAW FIRM, PLLC**

8887 Old University Blvd., Ste. 200  
NORTH CHARLESTON, SC 29406  
T: (843) 569-5511 / F: (843) 569-5411

*Paul B. Ferrara, III\**  
*Janel K. Ferrara\**

*\*(also Admitted in N.C.)*

December 10, 2025

**SENT VIA US MAIL:**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: EM Family Trust v. Katie Lynn Mallace**  
**Common Pleas Case No.: 2023-CP-10-00192**  
**Appellant Case No.: 2025-001402**  
**Our File No.: 23-515**

Dear Ms. Kitchings:

Please find enclosed an original copy of Appellant's Initial Brief and Designation of Matter, Certificate of Counsel, and Proof of Service to be filed for the above referenced case.

Thank you,

**FERRARA LAW FIRM, PLLC**



Paul B. Ferrara III

Enclosures: as stated  
cc: A. Parker Barnes, Esq., via email  
Carlisle Allen, Esq. via email