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November 26, 2013

Via Hand Delivery

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

RECEIVED  
NOV 26 2013  
SC Court of Appeals

Re: Woods v. Hinson, et. al.  
2011-CP-12-323  
Appellate Case No. 2012-212330  
MB File No.: 12085.4

Dear Ms. Kitchings:

I represent the Respondents in the above-referenced appeal, and I am herein responding to Appellant's recent Motion to Substitute Party.

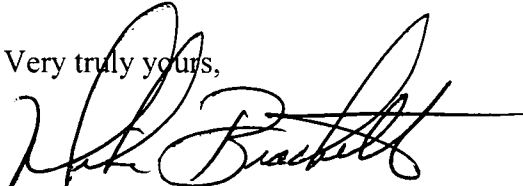
The parties were notified by the Court by letter dated November 7, 2013, that the appeal was to be submitted to the Court during the November term without oral argument.

Appellant's motion is based on the fact that Respondent Lois Hinson died on October 15, 2013 and that the personal representative of her estate should be substituted as a party. Please note that the named Respondents are in this case because they were named by the Appellant-Plaintiff.

The record from the trial court shows that Lois Hinson was once the owner of a 25% undivided interest in the real property involved in the case, **but that she conveyed her interest to her daughter, the Respondent Christine Jones.** See Respondent Breakfield's (as personal representative) Affidavit in Support of Respondents' Motion for Summary Judgment (R. 701-704, ¶ 27; and Respondents' Brief in this Court, p. 13, ¶ 27.) Appellant has made no showing in contradiction to this evidence.

Consequently, the decedent Lois Hinson has no interest in the subject matter at issue herein, and there is no need for a substitute, successor party.

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Very truly yours,  
  
B. Michael Brackett

cc. Robert H. Breakfield, Esquire  
Mell Woods