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**Mar 23 2026**

**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 abovenamed 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, ..... Appellants.

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**SUPPLEMENTAL DESIGNATION OF MATTER**

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*/s/ Paul B. Ferrara, III*  
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March 23, 2026

Pursuant to Rule 209(a) SCACR, the Appellants hereby designate the following additional matters to be included in the Record on Appeal as listed hereunder. These materials are necessary to address issues raised in Respondents' Brief and to ensure the Record on Appeal accurately reflects the evidence presented at trial.

**Exhibits**

1. Defendants' Exhibit 11 – Multiple tax maps of the subject property;
2. Defendants' Exhibit 12 – Deed recorded in Deed Book R-126 at Page 163.

I, the undersigned counsel, do hereby certify pursuant to Rule 209(c) SCRCR that Appellant's Designation of Matter to be included in the Record on Appeal contains no matter that is irrelevant to this appeal.

Respectfully submitted this 23rd day of March 2026.

March 23, 2026

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**CERTIFICATION OF SERVICE**

I hereby certify that on this 23rd day of March, 2026, I served a true and correct copy of the foregoing Supplemental Designation of Matter upon counsel of record.

**FERRARA LAW FIRM, PLLC**

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