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Apr 23 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

THE HONORABLE MAITE MURPHY
CASE NUMBER: 2020-CP-07-00829
APPELLATE CASE NUMBER: 2023-001278

CAROL JENKINS JACKSON AND
JUDY SHARON JENKINS WATKINS.....Appellants.

v.

MICHAEL F. RIVERS, R.M. LAPP, TRUSTEE FOR THE ST. HELENA
ASSETT TRUST, HEIRS OF HARRISON RIVERS, HEIRS OF OPHELIA
RIVERS, HEIRS OF HAROLD W. RIVERS, HEIRS OF RACHAEL CHISHOLM, HEIRS
OF FLORENCE C. PARKER, HEIRS AT LAW OF REUBEN M. CHISHOLM, AND ALSO
VERNELL I. SMASHUM, BARBARA MCCLARKING, BEVERLY J. SCOTT, AMOS
WILLIAMS, CLIFFORD HUFF, SANDRA MACK-HUFF, TRUSTEE FOR THE
MARGARET LOYD SUMPTER TRUST DATED AUGUST 30, 2002, JOSEPH A. MOORE
ALL OF WHOM ARE BELIEVED TO BE ADJACENT LANDOWNERS AND ARE MADE
DEFENDANTS IN THIS ACTION, AND ALSO ALL OTHER PERSONS UNKNOWN
HAVING OR CLAIMING TO HAVE ANY RIGHT, TITLE, ESTATE, INTEREST IN OR
LIEN UPON THE REAL PROPERTY OR ANY PART THEREOF DESCRIBED IN THE
COMPLAINT HEREIN, AS JOHN DOE AND MARY ROE, INCLUDING ALL PERSONS
WHO MAY BE DECEASED, MINORS, IN THE MILITARY SERVICE OF THE UNITED
STATES WITH THE MEANING OF TITLE 50 UNITED STATES CODE, REFERRED TO AS
THE SERVICEMEMBERS CIVIL RELIIVE ACT, AS AMENDED, PERSONS ON
COMPOS MENTIS AND UNDER ANY OTHER DISABILITY.

OF WHOM MICHAEL F. RIVERS IS THE.....RESPONDENT.

RETURN TO MOTION FOR COSTS

R. THAYER RIVERS, JR.
Law Office of R. Thayer Rivers, Jr.
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(843) 726-8136
Attorney for the Appellant

April 22, 2026

The Repondent, Michael F. Rivers, was on a numerous parties' list. He prevailed on his issue whereas the rest of the issues were remanded back to the trial court for further proceedings. If the Court grants this motion, he will be entitled to all the relief that ALL the Respondents can apply for. This endangers the Appellants of double or triple recoveries.

The Appellants respectfully request that the Court make an allocation of costs and attorney fees.

Respectfully submitted,

Law Office of R. Thayer Rivers, Jr.

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(843) 726-8136

Attorneys for the Appellants

Ridgeland, South Carolina,
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OF WHOM MICHAEL F. RIVERS IS THE.....RESPONDENT.

PROOF OF SERVICE

I certify that I have served the Return to Motion for Costs on the Respondent, Michael F. Rivers, by depositing a copy of same in the United States Mail, postage prepaid, on April 22, 2026, addressed to his attorney of record, H. Fred Kuhn, Jr. Post Office Box 507, Beaufort, SC 29901.

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April 22, 2026