

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master-in-Equity
The Honorable Mikell R. Scarborough

Case No. 2023-CP-10-00192
Appellate Case No. 2025-001402

Katie Lynn Mallace and Micah James Mallace Respondents

v.

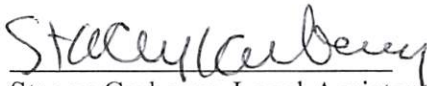
Southeastern Capital Corporation; Krista Brown-Penney, Co-Trustee, EM Family Trust; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as a portion of Third Street shown on a plat recorded 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.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondents on counsel of record on May 4, 2026, by electronic mail only to the following:

Paul B. Ferrara, III
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Stacey Carberry, Legal Assistant

**HAYNSWORTH
SINKLER BOYD**

RECEIVED

May 04 2026

SC Court of Appeals

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May 4, 2026

VIA EMAIL & REGULAR MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Katie Lynn Mallace v. EM Family Trust*
Appellate Case No. 2025-001402

Dear Ms. Kitchings:

This firm represents the Respondents in the above matter. Enclosed for filing, please find the Initial Brief of Respondents together with our Proof of Service for the same.

Pursuant to your correspondence dated March 24, 2026, one (1) bound copy of the Initial Brief of Respondents included in the mailed copy.

If you have any questions, please give me a call. Thank you for your assistance in this matter.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac

Enclosure

cc: Paul B. Ferrara, III (paul@ferraralawfirm.net)
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