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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM SUMTER COUNTY
Honorable Michael M. Jordan, Master In Equity**

Appellant Case No: 2025-002220

Celestine Parker and Loretta Black.....Appellants

-vs-

John Doe, Jane Doe, Richard Roe, Mary Roe, Infants, Insane Persons and Incompetents, Being Fictitious Names, Designating as a Class Any Unknown Person or Persons, Whose Tur Names are Unknown, Who May be an Heir, Distributee, Devisee, Legatee, Wido, Widower, Issue, Personal Representative, Executor, Administrator, Successor, Creditor, Assign and/or alienee of Phillis Weathers; Valarie McCray, Harry Burns, Alma Jackson, Lynn Neely, Matthew Peterson, Carolyn Dupree, Gary Dupree, Greogry Dupree, Edith Davis, May Thelma McGee, Rodney Pitts, Denise Pitts, Sheryl James, Marie Gilespie, Eugene Canty, Ethel Swain, Amanda Canty, Connie Canty, Alexander Canty, Clarence Canty, Jr., Daniel Canty, Luther Brogdon, Everette Brogdon, Naomi Brogdon, Obar Davis, Wilaba Brogdon, Michelle Thompson, Harold Brogdon, Jr., Janice Brogdon, Lillie Mae Cleaveland Payton, Brian Canty, Gloria Canty, Herbert Canty, Randolph Gaymon, Alvin L. Gaymon, Ernestine Gaymon, Aaliyaa Hasan, Taheedah Griffin, Eugene Dowling, Sheryl Dowling, Donna Dowling, Sherly Richards, Gail White, Debra White, Dana White, Damon White, Danielle White, Also Any and All Other Persons or Legal Entities, Known and Unknown, having or claiming and Right, Title, Estate, Interest in or Lien upon the Real Property Described in the Complaint.....Respondents

Of Whom Valarie McCray is the Respondent

**RETURN AND OBJECTION TO APPELLANT’S
NOTICE OF NEWLY DISCOVERED PROPERTY TRANSFER DOCUMENTS**

The above-named Respondent, by and through her undersigned counsel, does hereby respectfully Return to and vehemently Object to the Appellant’s submitted Notice of Newly Discovered Recorded Property Transfer Documents, submitted by the Appellants to this Court on or about May 28, 2026 and received by offices of counsel for the Respondent on or about June 1, 2026.

The Appellants herein Notice the Court that they have uncovered new documents confirming transfer of property and allege relevancy of these documents to their request for appeal in this matter.

The Respondent herein requests the Court deny the implied request for inclusion of these documents in this matter.

The Appellants herein have and had timely filed their Initial Brief in this matter, and the Respondent has filed their Initial Brief and their appropriate Designation of Matters to be Included on Record on Appeal.

The Appellant's allegation of newly discovered documents is not material to the issues on Appeal. The Respondent is further informed and believes that the South Carolina Appellate Court Rules (SCACR) prohibits the provision of any material not presented to the lower court. The Appellants had the benefit of counsel during the lower court action from which this Appeal originates and these documents were not provided at the time of the trial of this matter and as such should not be included in the matters to be determined by this Court.

The Respondent in this matter is informed and believes that the Record on Appeal to be filed by the Appellant should include only those matters as designated by the parties and provided to the Court herein at the time of the filings of the initial briefs of the parties.

For the reason set forth herein, counsel for the Respondent submits that good cause has been shown why the documents as referenced in the Appellant's Notice should not be accepted by this Court or included in the Record on Appeal in this matter.

Respectfully Submitted,

/s/Charles T. Brooks, III
Charles T. Brooks, III /Bar ID#11762
Attorney for the Respondent
309 Broad Street
Post Office Box 3512
Sumter, SC 29151
(803) 418-5708

Sumter, SC
June 1, 2026

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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SC Court of Appeals

APPEAL FROM SUMTER COUNTY

Circuit Court

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Case No: 2025-002220

Celestine Parker and Loretta Black.....Appellants

-vs-

John Doe, Jane Doe, Richard Roe, Mary Roe, Infants, Insane Persons and Incompetents, Being Fictitious Names, Designating as a Class Any Unknown Person or Persons, Whose Tur Names are Unknown, Who May be an Heir, Distributee, Devisee, Legatee, Wido, Widower, Issue, Personal Representative, Executor, Administrator, Successor, Creditor, Assign and/or alienee of Phillis Weathers; Valarie McCray, Harry Burns, Alma Jackson, Lynn Neely, Matthew Peterson, Carolyn Dupree, Gary Dupree, Greogry Dupree, Edith Davis, May Thelma McGee, Rodney Pitts, Denise Pitts, Sheryl James, Marie Gillespie, Eugene Canty, Ethel Swain, Amanda Canty, Connie Canty, Alexander Canty, Clarence Canty, Jr., Daniel Canty, Luther Brogdon, Everette Brogdon, Naomi Brogdon, Obar Davis, Wilaba Brogdon, Michelle Thompson, Harold Brogdon, Jr., Janice Brogdon, Lillie Mae Cleaveland Payton, Brian Canty, Gloria Canty, Herbert Canty, Randolph Gaymon, Alvin L. Gaymon, Ernestine Gaymon, Aaliyaa Hasan, Taheedah Griffin, Eugene Dowling, Sheryl Dowling, Donna Dowling, Sherly Richards, Gail White, Debra White, Dana White, Damon White, Danielle White, Also Any and All Other Persons or Legal Entities, Known and Unknown, having or claiming and Right, Title, Estate, Interest in or Lien upon the Real Property Described in the Complaint.....Respondents

Of Whom Valarie McCray is the Respondent

PROOF OF SERVICE

I, the undersigned, do hereby certify that on this June 1, 2026, I served the foregoing **Return and Objection to Appellant’s Notice of Newly Discovered Property Transfer Documents**, as well as **Proof of Service** in this matter by depositing a true copy of it in the United States Mail, postage prepaid, on June 1, 2026, addressed to the Appellants, Celestine Parker at 416 Meadowbury Drive, Columbia, South Carolina 29203, and Loretta Black, at 60 Highland Avenue, Sumter, South Carolina 29150.

Dated: June 1, 2026

/s/Charles T. Brooks, III

Charles T. Brooks, III

Attorney for the Respondent

309 Broad Street

Sumter, South Carolina 29150

(803) 418-5708