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**May 04 2026**

**SC Court of Appeals**

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.

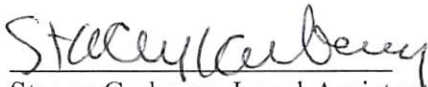
Southeastern Capital Corporation; Krista Brown-Penney, Co-Trustee, EM Family Trust; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as a portion of Third Street shown on a plat recorded 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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North Charleston SC 29406  
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Stacey Carberry, Legal Assistant

**HAYNSWORTH  
SINKLER BOYD**

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HAYNSWORTH SINKLER BOYD, P.A.  
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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

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A. Parker Barnes, III ([pbarnes@hsblawfirm.com](mailto:pbarnes@hsblawfirm.com))  
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