

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Benjamin C.P. Sapp, Special Referee

Civil Action No. 2021-CP-15-00210
Appellate Case No. 2025-002580

Christopher Hamilton, Cleo Hamilton, Janie Nelson a/k/a Jannie Nelson, Juanita Williams, Elvira Memminger, Clarence Washington, Delinda W. Dawson, David Washington, Jr., Elizabeth Ann Lee a/k/a Elizabeth Ann Cherri, Arthur Lee, Miranda Clark a/k/a Aranda Clark, Catherine Dent, Joseph Holmes, Gwendolyn Miller, Jan Elizabeth Burton, Brenda Brown, and Guy Ackerman, Plaintiffs, v. Rehabilitation Consultants of Charleston, LLC., William Arnold Kellman, Priscilla Judge, Rhonda B. Winfield, Samuel Cox, Jr., Jimmy Cox, Lavorge Cox, Deshawn Rambert-Cox, Vanessa Cox a/k/a Vanessa Cox-Rickenbacker, Toni Cox a/k/a Tonya Piercy, Felicia Cox, Andrew Walker, Selena Walker, individually and as Personal Representative of the Estate of Earl Walker, Sonya Teresa White, Raymond Walker, Ardelia Stokes a/k/a Della Stokes, Leroy Smalls, Jr. a/k/a Leroy H. Smalls, Gwendolyn Bright, Elizabeth Sawyer, Johnny J. Smalls, Micah Frasier, Zelemania Walker a/k/a Sellemena Walker, Terrance Walker, George Walker, Jr., Cherise Walker Turner, Naomi Walker, Richard Cox, Richard Wilton Washington a/k/a Weldon Washington, Donna Mitchell and Curtis Mitchell, if they be alive, and John Doe and Jane Doe, whose true names are unknown and fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors, or assigns of the above-named Defendants, if they or any of them be dead, and of Charity Washington, Centrilla Washington, Andrew Washington, Priscilla Washington, a/k/a Persella Washington, Oscar Washington, Gertie Washington, Margaret Kellman, Horace Heyward, Delores Washington a/k/a Delores Williams, Johnny Washington a/k/a Johnnie Washington, Ruthie Mae Washington, Eugene Washington a/k/a Sam Washington, Geneva Washington, Maybel Walker a/k/a Maybelle Washington, Lilla Mae a/k/a Lucille Cox Smalls, Leroy Smalls, Stanley Smalls a/k/a Ronnie Smalls, Willie Hayden Smalls, George Walker, Samuel Cox, Lucille Chisolm a/k/a Loucille Chisolm, Earl Walker, Pearl Hamilton, James Hamilton, Joseph Hamilton, Elise Simmons, James Washington, Victoria Johnson Green, David Washington, Sr., Carrier Washington a/k/a Carrie Washington Williams, Carrie Washington Lee, Joseph Lee, Norris Lee, Israel Washington, David Washington, Golden Washington, Minnie Brantley Johnson

a/k/a Minnie Brantley, Mabel Simmons, William Washington a/k/a Billy Washington, Millie Washington, Phoebe Ann Washington, and Margaret Rovena Kellman, all deceased; and Mary Roe and Richard Roe, whose true names are unknown and fictitious names designation infants, persons under disability, incompetents, imprisoned, or those persons in the military, if any; South Carolina Department of Revenue, and also all other persons, known or whose true names are unknown, claiming any right, title, interest in, or lien upon the real estate described in the Complaint herein, Defendants.

of which Gwendolyn Bright, Felicia Cox, Micah Frasier, Elizabeth Sawyer, Donald R. Smalls, Johnny J. Smalls, Leroy Smalls, Ralph B. Smalls, Cherise Walker Turner are the Appellants,

and

Donna Mitchell and Curtis Mitchell are the Respondents.

PROOF OF SERVICE

I hereby certify that the *Appellants' Reply* to Respondents' Initial Brief and the *Designations of Matters to be included in the Record on Appeal* in this matter was served upon counsel of record for the Respondents by depositing a copy in the United States Postal Service, regular mail, and by electronic mail on this 10th day of June, 2026, addressed to counsel's primary e-mail address listed in the South Carolina Attorney Information System, as set forth below.

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Respectfully Submitted,

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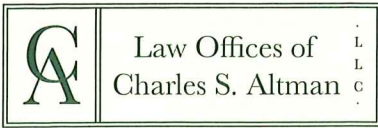
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Attorneys for Appellants



June 10, 2026

VIA FEDEX AND EMAIL ONLY

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: Gwendolyn Bright, et al. v. Donna Mitchell, et al.
Appellate Case No: 2025-002580
Our File No: 21-1830

Dear Ms. Kitchings:

Please find enclosed for filings, on behalf of Appellants, the following documents:

1. Appellants' Reply to Respondents' Initial Brief;
2. Appellants' Designation of the Matter; and
3. Proof of Service of Appellants' Reply to Respondents' Initial Brief and to Appellants' Designation of the Matter.

By copy to their counsel of record, J. Chris Lanning, Esq., Thomas H. Brush, Esq., and Harold A. Oberman, Esq, via filing and service by U.S. (regular mail) and electronic mail, the Respondents in this case are simultaneously being served with the documents stated above.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Natalia Flores', with a large, stylized flourish at the end.

Natalia Flores
nflores@caltmanlaw.com

encs: as stated

cc: Thomas H. Brush, Esq. (via USPS and Email only)
J. Chris Lanning, Esq. (via USPS and Email only)
Harold A. Oberman, Esq. (via USPS and Email only)