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Jun 12 2026

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 True Names are Unknown, Who May be an Heir, Distributee, Devisee, Legatee, Widow, Widower, Issue, Personal Representative, Executor, Administrator, Successor, Creditor, Assign and/or assignee of Phillis Weathers; Valarie McCray, Harry Burns, Alma Jackson, Lynn Neely, Matthew Peterson, Carolyn Dupree, Gary Dupree, Gregory Dupree, Edith Davis, May Thelma McGee, Rodney Pitts, Denise Pitts, Sheryl James, Marie Gilesbie, 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 Cleveland 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
MOTION PURSUANT TO RULE 240

The above-named Respondent, by and through her undersigned counsel, does hereby respectfully Return to and vehemently Object to the Appellant's submitted Motion Pursuant to Rule 240, submitted by the Appellants to this Court on or about June 8, 2026, and received by offices of counsel for the Respondent on or about June 11, 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 Appellant's request and motion for inclusion of

these documents in this matter. The documents in question were available to the Appellant and her trial counsel at the time of the trial of these matters before the lower court.

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 Appellants herein have 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; this matter is ripe for the production of the Record on Appeal by the Appellant as well as her Final Brief. 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 Motion of the Appellant should be denied.

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 11, 2026

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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM SUMTER COUNTY

Circuit Court

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-vs-

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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 Motion Pursuant to Rule 240**, in this matter by depositing a true copy of it in the United States Mail, postage prepaid, on June 12, 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 12, 2026

/s/Charles T. Brooks, III

Charles T. Brooks, III

Attorney for the Respondent

309 Broad Street

Sumter, South Carolina 29150

(803) 418-5708