

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable Michael Jordan
Master in Equity

CASE NO. 2025-002220

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JUN 22 2026

SC Court of Appeals

Celestine Parker
Loretta Black

Appellants,

v.

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 and Heir, Distributee, Devisee, Legatee, Widow, 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, Gregory 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, Geline Graham, Christopher 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 Any Right, Title, Estate, Interest In or Lien Upon the Real Property Described in the Complaint,

Defendants,

of whom Valarie McCray is Respondent

REPLY IN SUPPORT OF MOTION (to Objection Filed by Appellee)

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**REPLY IN SUPPORT OF APPELLANT'S MOTION REGARDING NOTICE AND
MOTION OF NEWLY DISCOVERED DOCUMENTS.**

Appellant respectfully submits this Reply in support of her Motion regarding newly discovered documents and responds to Appellee's objection.

Appellee objects to Appellant's Motion on the basis that the referenced documents are not part of the record on appeal. Appellant does not dispute that the Court of Appeals is generally limited to the record developed in the trial court. However, Appellant submits that the Motion is not an attempt to improperly introduce new evidence for appellate fact-finding, but rather to bring to the Court's attention information directly relevant to issues already raised and preserved in the appeal.

The underlying matter involves the transfer/sale and ownership of real property that was the subject of litigation, including questions regarding the validity of title and the status of parties asserting ownership interests. Appellants referenced the Title to Real Estate issues in our Initial Brief as part of the matters before the trial court.

After filing our Initial Brief, Appellant discovered additional recorded documents reflecting subsequent transfer/sale of the property occurring in 2024 during the pendency of ongoing litigation. Appellants had no prior notice of these transactions, nor of any related probate or distribution actions affecting the property interests at issue.

Appellant further states she was not notified to the underlying deaths, distributions, or changes in title affecting the property during the litigation period. The newly discovered documents were obtained independently and were not available to Appellant at the time of the trial court proceedings or prior briefing.

Appellant is not requesting that this Court determine the validity of the newly discovered documents in the first instance. Rather, Appellant respectfully request that the Court consider whether these circumstances are relevant to the integrity of the proceedings below and whether further

procedural relief is warranted, including but not limited to consideration of supplementation of the record or such other relief as the Court deems appropriate under its authority.

For these reasons, Appellant respectfully requests that the Court deny Appellee's objection and grant Appellant's Motion.

Respectfully Submitted,


Celestine Parker

Appellant, Pro Se

June 22, 2026

THE STATE OF SOUTH CAROLINA
In The Court of common Pleas-----

APPEAL FROM SUMTER COUNTY
Michael Jordan, Master in Equity Judge

Case No. 2025-00222

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SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Reply In Support of Motion (to Objection Filed by Appellee)
by depositing a copy of it in the United States Mail, postage prepaid on
June 22, 2026, addressed to Charles Brooks III, Attorney,
309 Broad Street, Sumter, South Carolina 29251

Date June 22, 2026


Celestine Parker
416 Meadowbury Dr
Columbia, South Carolina 29203
803-240-7760

~~November 11, 2025~~

June 22, 2026

Other Counsel of Record:

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Attorney for Respondent


Celestine Parker

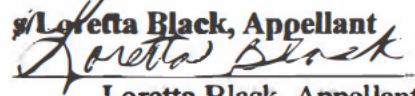
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Loretta Black

Loretta Black, Appellant

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Appellant