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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas
Hon. Thomas W. McGee, III, Circuit Court Judge

Appellate Case No. 2025-002548
Trial Court Case No. 2023-CP-1200288

Mary Simpson Carpenter Crowder, by and Through
Michael Paul Swearingen, as Special Administrator
for the Estate of Mary Simpson Carpenter Crowder, Appellant,

v.

Cedar Grove Baptist Church, Deacons of Cedar Grove
Baptist Church, a/k/a Cedar Grove Providence Church,
SCBT, and South State Bank, Respondents,

and

Cedar Grove Baptist Church as Third-Party Plaintiff Respondent,

v.

James Wylie Crowder, III, as Third-Party Defendant Appellant.

**APPELLANTS' DESIGNATION OF MATTER
FOR THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Appellants Mary Simpson Carpenter Crowder, by and Through Michael Paul Swearingen, as Special Administrator for the Estate of Mary Simpson Carpenter Crowder and James Wylie Crowder, III, designate the following material for inclusion in the Record on Appeal. Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to this appeal.

Orders

1. Form 4 Order Denying Summary Judgment (June 17, 2024)
2. Form 4 Order issuing Statement of Judgement (December 8, 2025)
3. Post Trial Order and Judgement (December 10, 2025)

Pleadings

4. Lis Pendens (June 7, 2023)
5. Complaint (June 8, 2023)
6. Defendants' Answer, Counterclaim, and Third-Party Complaint (July 17, 2023)
7. Plaintiff's Reply to Counterclaim (August 6, 2023)
8. Third-Party Defendant Crowder's Answer, Counterclaims, and Crossclaims (August 6, 2023)
9. Defendant's Reply to Counterclaim of Third-Party Defendant Crowder (October 5, 2023)

Motions and Memoranda

10. Defendant's Motion and Memorandum in Support of Motion for Summary Judgment (March 26, 2024)
11. Plaintiff's and Third-Party Defendant's Memorandum in Opposition to Defendant's Motion for Summary Judgement, Return, and Affidavits (May 31, 2024)
12. Defendant's Motions in *Limine* and Pre-Trial Brief (November 13, 2025)
13. Plaintiff's and Third-Party Defendant's Motions in *Limine* (November 13, 2025)
14. Plaintiff and Third-Party Defendant's Motion for Judgement Notwithstanding Verdict (November 25, 2025)
15. Defendant's Post Trial Motions (November 25, 2025)
16. Defendant's Request for Judicial Notice (November 25, 2025)
17. Defendant's Affidavit of Costs (November 25, 2025)

18. Plaintiff and Third-Party Defendant's Response to Post-Trial Motions (December 3, 2025)
19. Defendant's Response to Post-Trial Motions (December 3, 2025)
20. Notice of Appeal (December 19, 2025)
21. Amended Notice of Appeal (January 9, 2026)

Transcript

22. Trial Transcript (November 17, 2025 – November 19, 2025)

Exhibits and other materials

23. Plaintiff's Trial Exhibits:

- a. Exhibit 1 – Probate Court Order
- b. Exhibit 2 – Tax Map
- c. Exhibit 3 – Deed – Page 62
- d. Exhibit 4 – Deed – Book 149, Page 734
- e. Exhibit 5 – Deed – Book 149, Page 736
- f. Exhibit 6 – Title to Real Estate
- g. Exhibit 7 – Plat – Book 480, Page 536
- h. Exhibit 8 – Deed – Book 528, Page 237
- i. Exhibit 9 – Plat – Book 528, Page 236
- j. Exhibit 10 – Deed – Book 543, Page 867
- k. Exhibit 11 – Deed – Book 561, Page 56
- l. Exhibit 12 – Plat 107, Page 78
- m. Exhibit 13 – Deed – Book 632, Page 346
- n. Exhibit 14 – Deed – Book 776, Page 146
- o. Exhibit 15 – Plat CBC, Page 183
- p. Exhibit 16 – Deed – Book 824, Page 206
- q. Exhibit 17 – Plat
- r. Exhibit 18 – Deed – Book 535, Page 286
- s. Exhibit 19 – Last Will and Testament
- t. Exhibit 20 – Probate of Will Amended Application
- u. Exhibit 21 – Certificate of Appointment
- v. Exhibit 22 – Inventory and Appraisement
- w. Exhibit 23 – Photographs
- x. Exhibit 24 – Satellite Map
- y. Exhibit 25 – Plat Map
- z. Exhibit 26 – Photographs

24. Defendant's Trial Exhibits

- a. Exhibit 1 – Articles of Incorporation, Carolina Cotton, LLC
- b. Exhibit 2 – UCC-1 Filing, 2015 John Deere Cotton Picker

- c. Exhibit 3 – UCC-1 Filing, John Deere 9560
- d. Exhibit 4 – UCC-1 Filing, John Deere 726
- e. Exhibit 5 – UCC-1 Filing, John Deere CP77 Cotton Picker
- f. Exhibit 6 – UCC-1 Filing, John Deere CX20 Rotary Cutter
- g. Exhibit 7 – UCC-1 Filing, John Deere 4940 Sprayer
- h. Exhibit 8 – Probate Court Summons and Complaint
- i. Exhibit 9 – Photographs
- j. Exhibit 10 – Photographs
- k. Exhibit 11 – Photograph
- l. Exhibit 12 – Photograph
- m. Exhibit 13 – Photograph
- n. Exhibit 14 – Google Map
- o. Exhibit 15 – Google Map
- p. Exhibit 16 – Google Map
- q. Exhibit 17 – Google Map
- r. Exhibit 18 – Google Map

25. Court's Trial Exhibits

- a. Exhibit 1 – Jury Charge
- b. Exhibit 2 – Jury Note
- c. Exhibit 3 – Judge's Response to Jury Note
- d. Exhibit 4 – Jury Charge Sent to Jury
- e. Exhibit 5 – Jury Note
- f. Exhibit 6 – Judge's Response to Jury Note

26. Correspondence (November 20, 2025)

Respectfully submitted,

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July 15, 2026
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