

November 21, 2013

Mell Woods  
P.O. Box 2603  
Lancaster, SC 29721

S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Mell Woods v. John Hinson  
Appeals Case # 2012-212330

Dear Mrs. Allen:

This is the matter I spoke to you about yesterday (Thursday.) Attached is an original, and six copies of a Motion to Substitute a Party in the above case, and another motion fee. This is to replace the ones that I sent in Monday which I believe have been lost by the Post Office on Assembly Street. However, none of this is the fault of the Court of Appeals.

Sincerely,



Mell Woods

Copy to: B. Michael Brackett, defense attorney.

**RECEIVED**  
NOV 22 2013  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Chester County  
Court of Common Pleas  
Brooks P. Goldsmith, Circuit Court Judge

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Case Number 2011-CP-12-0323

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Mell Woods . . . . . Appellant,

v.

John D. Hinson; Christine Jones; John C. Hinson; William L. Hinson; Lois Hinson; Robert Breakfield, as Personal Representative of the Estate of Reba P. Hinson; Elaine H. Hensley; Robert H. Hinson; George Standford, as Personal Representative of the Estate of Linda H. Standford; William C. Hinson, Jr.; Darrell W. Hinson; Mary Roe and John Doe, fictitious names used to designate all other parties, whose names are unknown, and any and all other persons claiming any right, title, estate, interest or lien upon the real estate described in the complaint,

. . . . . Respondents.

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MOTION TO SUBSTITUTE PARTY

Court of Appeals Internal Tracking Number 2012 212330

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1. Under Rule 25(a)(1), and (e) SCRCF, appellant moves that a proper party for Lois Hinson listed above, be substituted as Mrs. Hinson has died.

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2. This action involves real estate only and it is the position of appellant that the action survives the death of any party.

3. Appellant attaches the obituary of Mrs. Hinson which appeared in the Lancaster News on October 18, 2013.

This 18 day of November, 2013.



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Mell Woods

P.O. Box 2603  
Lancaster, SC 29721

[Certificate of Service Follows]



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Abney Baptist Church Cemetery.

The family will receive friends after the burial in the Abney Baptist Church Family Life Center.

Memorials may be made to First Baptist Church, P.O. Box 67, Kershaw, SC 29067, or McDuffie County Christian Learning Center, P.O. Box 2009, Thomson, Ga.

### Lois Griffin Hinson, 80

Mrs. Lois Servinia Griffin Hinson, 80, died Tuesday, Oct. 15, 2013, at Agape Hospice of Rock Hill.

The service was 12:30 pm Thursday, Oct. 17, at Lancaster Memorial Park. The Rev. Barry Howell officiated. Interment followed at Lancaster Memorial Park in Lancaster.

The family received friends from 11 a.m. to noon Thursday at McLean Funeral Directors of Lancaster.

Mrs. Hinson was born April 14, 1933, in Fort Lawn. She was a daughter of the late Reba Narcissia Pettit Hinson and Levi Hoyt Hinson. She worked as a homemaker. She was a devoted member of Fort Lawn Church of God.

In addition to her parents, she was preceded in death by a brother, Calvin Hinson.

Mrs. Hinson is survived by her husband, Mack Hinson; a daughter, Christine Jones and her husband, Robert L., of Richburg; two sons, Dennis Griffin of Myrtle Beach and William Griffin of Texas; a brother, John Hinson of Great Falls; a sister, Kathy Adams of Fort Lawn; six grandchildren; and four great-grandchildren.

In lieu of flowers memorials may be made to Agape Hospice of Rock Hill, 159 Sedgewood Drive, Rock Hill, SC 29732.

Remembrances may be sent to the family at www.

N.C. his father-in-law, Ross Cauthen, and his wife, Gloria; and his mother-in-law, Carole T. Cauthen and her lifelong partner, Ken Willis, all of Lancaster.

Mr. Horne was a former employee of Interstate Brands Corp. Merita Inc.

Tommy loved sports - The Dallas Cowboys, The University of South Carolina Gamecocks hunting and fishing. He enjoyed spending time with his family.

He will be cremated according to his wishes. A private celebration of life service is planned for a later date.

The family will receive friends at the home, 1177 Peach Farm Road, Lancaster.

The family would like to express their thanks to Bobby Lane, Kirk Crump, Shyla Wallace and Hospice of Lancaster.

In lieu of flowers, memorials may be made to Second Baptist Church, 1462 Great Falls Highway, Lancaster, SC 29720.

### Leo R. Maguire, 87

Mr. Leo R. Maguire, age 87, died Tuesday, Oct. 15, 2013.

He was born Sept. 11, 1926, in Lynn, Mass., the son of the late Leo Joseph Maguire and Agnes Jeannette Maloney Maguire, and was the husband of Mary Faulkner Maguire.

Mr. Maguire retired as vice president and general manager of Lehigh-Lancaster, Inc. He was a graduate of the University of Maine and the University of South Carolina, where he obtained a master's degree in business administration. Mr. Maguire served as chairman of the board of Elliott White Springs Memorial Hospital and as president of the Lancaster County Chamber

An online guest register is available on the obituaries page at www.burgessfunerals.com

Burgess Funeral Home and Crematory is caring for the family of Mr. Maguire.

### James D. Murchinson Jr.

James D. "Sonny" Murchinson Jr., 77, died Wednesday, Oct. 16, 2013.

Funeral arrangements are incomplete and will be announced by Crawford Funeral Home.

### Cleatus Pate Jr., 75

Cleatus Pate Jr., 75, died Wednesday, Oct. 16, 2013. He was a son of the late Cleatus Pate and Emma Curtis.

Survivors include two sons, Michael Pate of Pageland and Cleatus Pate III of York; three daughters, Vicky Cason of Lancaster, Sandra Wilkins of Rock Hill and Cathy Logan of Lancaster; 11 grandchildren; and six great-grandchildren.

Services are 3 p.m. today, Oct. 18, at Blackmon Cemetery, officiated by the Rev. Donald Waldrop.

Lancaster Funeral Home is in charge.

### James Franklin Plyler, 94

Mr. James Franklin Plyler, age 94, died Wednesday, Oct. 16, 2013.

He was born Nov. 22, 1918, in Union County, N.C., the son of the late Jackson Edgar Plyler and Lillie Broome Plyler and was the husband of the late Loma Robinson Plyler.

He retired from Springs Industries, was a Mason with Jackson Masonic Lodge, a Shriner with the Hejaz Temple and a member of Trinity United Method-

Roberts, 74, died Saturday, Oct. 12, 2013.

She was a daughter of the late Leland and Mae Nicholson Golden.

Survivors include her husband, Arnold Roberts; three children, Robbie Roberts of Hartsville, Dana Braswell and Kevin Roberts, both of Kershaw; two sisters, Roslyn Holmes of Martinsburg, W. Va., and Linda Golden of El Paso, Texas; seven grandchildren; and two great-grandchildren.

Services were Tuesday, Oct. 15, at Buffalo Baptist Church, officiated by the Revs. Curtis Cameron and Kevin Walters. Burial was in the church cemetery.

Memorials may be made to Buffalo Baptist Church, 6390 Lockhart Road, Kershaw, SC 29067, or to Mount Pisgah-Buffalo Rescue Squad, 1150 Buffalo Creek Road, Kershaw, SC 29067.

See DEATHS | Page 10A

*It's all taken*



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Appeal from Chester County  
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. . . . . Respondents.

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CERTIFICATE OF SERVICE

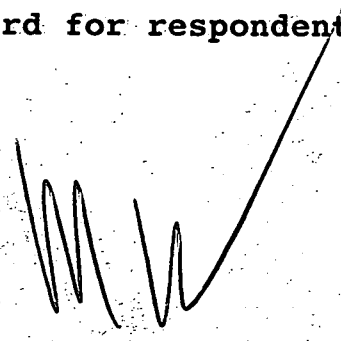
Court of Appeals Internal Tracking Number 2012 212330

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I hereby certify that I have served the Respondents with a true copy of the within and foregoing Motion to Substitute a Party by placing the copy in the U.S. Mail with sufficient postage addressed to the counsel of record for respondents, to wit:

B. Michael Brackett  
Moses Koon & Brackett  
P.O. Box 100261  
Columbia, SC 29202

This 18 day of November, 2013



P.O. Box 2603  
Lancaster, SC 29721

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Mell Woods



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