

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM CHARLESTON COUNTY**
Will Wheeler, Circuit Court Judge
Appellate Case No. 2026-001766

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SC Court of Appeals

IN THE MATTER OF: JUNE KEA MEEKS, Decedent

Patricia C. Meeks, Appellant,
v.
Christina Wynn, Respondent.

**APPELLANT'S MOTION FOR LEAVE TO FILE A RULE 60(b), SCRPC,
MOTION IN CIRCUIT COURT, FOR LIMITED REMAND, AND TO HOLD
APPELLATE DEADLINES IN ABEYANCE**

Appellant Patricia C. Meeks, appearing self-represented, respectfully moves pursuant to Rule 240, SCACR, and Rule 60(b), SCRPC, for leave to file a Rule 60(b) motion in the Charleston County Circuit Court; for a limited remand solely to permit that court to consider and rule upon the motion; and for an order holding appellate deadlines in abeyance while the limited remand is pending. Appellant does not ask this Court to make factual findings concerning the validity or effect of the Decedent's will. Instead, Appellant asks only for leave to present a discrete Rule 60(b) issue to the Circuit Court in the first instance.

I. PROCEDURAL POSTURE

1. This appeal is presently pending in the South Carolina Court of Appeals as Appellate Case No. 2026-001766, Patricia C. Meeks v. Christina Wynn.
2. The appeal arises from long-running proceedings concerning the Estate of June Kea Meeks and from the Charleston County Circuit Court's review of orders and proceedings originating in the Charleston County Probate Court.

3. While organizing and cross-referencing the probate materials for this appeal, Appellant identified a material connection among documents already existing within the broader probate history that was not previously presented to the Circuit Court as a unified issue.

II. THE RECORD MATERIALS THAT GIVE RISE TO THE PROPOSED RULE 60(b) MOTION

4. The probate materials include an Application/Petition for Probate and Appointment, filed November 22, 2013, with a copy of the Decedent's June 26, 2012 Last Will and Testament attached. A copy of that filing is attached hereto as Exhibit A.

5. The materials also include the sworn Affidavit of forensic document examiner Marvin H. Dawson, Jr., executed October 1, 2015, and sworn/notarized October 2, 2015, attached hereto as Exhibit B, and Mr. Dawson's Report of Examination dated September 9, 2015, attached hereto as Exhibit C.

6. Of particular significance, the Report of Examination states that Charleston County Probate Court staff member Allison Atwood provided Mr. Dawson with "Item 4," identified as the original inked Last Will and Testament of June Kea Meeks dated June 26, 2012. See Exhibit C.

7. The report further states that, following his examination, Mr. Dawson returned the original document to Ms. Atwood. Mr. Dawson's sworn affidavit further supports his examination of the original will and the circumstances under which it was provided to him. See Exhibits B and C.

8. Read together, Exhibits A, B, and C raise a material question concerning whether proceedings and rulings that treated, assumed, or relied upon an intestate posture were entered without consideration of the Probate Court's documented possession of the original will.

III. WHY LIMITED REMAND IS APPROPRIATE

9. Appellant does not characterize these documents as newly created evidence. The documents existed within the broader case history. The material point is that their relationship and significance became apparent to Appellant only when she recently compiled and cross-referenced the voluminous probate and appellate materials.

10. The proposed Rule 60(b) motion would ask the Circuit Court to determine, based upon the complete materials and the applicable law, whether relief from its judgment is warranted.

Appellant recognizes that the merits of such relief should be addressed by the Circuit Court in the first instance, not decided as an original factual matter by this Court.

11. Rule 60(b), SCRCF, expressly provides that during the pendency of an appeal, leave to make a Rule 60(b) motion must be obtained from the appellate court. Appellant therefore seeks that leave before filing the proposed motion in Circuit Court.

12. Rule 240(a), SCACR, expressly governs motions to remand. A limited remand would allow the Circuit Court to address the Rule 60(b) issue without requiring this Court to decide facts not previously adjudicated in that posture.

13. Limited remand also promotes judicial economy. If the Circuit Court grants Rule 60(b) relief, the posture or scope of the present appeal may materially change. If relief is denied, the Circuit Court will have made a written ruling on the issue, permitting any further appellate treatment to proceed on a defined record.

IV. REQUEST TO HOLD APPELLATE DEADLINES IN ABEYANCE

14. Rule 240(b), SCACR, provides that filing a motion does not itself stay appellate time limits unless otherwise provided or ordered by the appellate court. Appellant therefore expressly requests that deadlines for perfecting or briefing this appeal be held in abeyance while this motion and any limited remand are pending.

15. Appellant seeks only a temporary pause sufficient to permit the Circuit Court to consider the proposed Rule 60(b) motion. Appellant does not seek dismissal of the appeal and asks this Court to retain appellate jurisdiction during the limited remand.

V. MEMORANDUM OF AUTHORITIES

Rule 60(b), SCRCR, authorizes relief from a final judgment or order on specified grounds and expressly states: “During the pendency of an appeal, leave to make the motion must be obtained from the appellate court.” Rule 60(b), SCRCR.

Rule 240(a), SCACR, provides that Rule 240 governs motions filed in an appellate court, including motions to remand. Rule 240(c) requires a written motion stating its grounds, a memorandum with citation of authorities, a certificate or affidavit of service, and supporting affidavits or documents when the facts relied upon are not yet contained in the Record on Appeal or Appendix. Rule 240(a), (c), SCACR.

Rule 240(b), SCACR, further provides that appellate time limits are not stayed merely by filing a motion unless the rules or the appellate court provide otherwise. Appellant therefore specifically requests an order placing applicable appellate deadlines in abeyance during the limited remand.

The relief requested is narrow. Appellant asks the Court only to permit the Circuit Court to entertain the proposed Rule 60(b) motion, to hold the appeal in place while the Circuit Court rules, and to allow the appellate process to resume thereafter in the posture resulting from the Circuit Court's ruling.

PRAYER FOR RELIEF

WHEREFORE, Appellant Patricia C. Meeks respectfully requests that this Court:

- A. Grant Appellant leave, pursuant to Rule 60(b), SCRCPP, to file a Rule 60(b) motion in the Charleston County Circuit Court addressing the original-will custody evidence and related record materials described above and attached as Exhibits A, B, and C;
- B. Order a limited remand for the sole purpose of allowing the Circuit Court to receive, consider, and rule upon that Rule 60(b) motion;
- C. Hold applicable appellate deadlines in abeyance during the pendency of this motion and the limited remand;
- D. Retain jurisdiction over this appeal and permit the appellate proceedings to resume after the Circuit Court enters its written ruling; and
- E. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

s/ Patricia C. Meeks

Patricia C. Meeks, Appellant, self-represented

2466 Swallow Drive

Charleston, South Carolina 29414

Telephone: 843-607-2175

Email: meekspatricia@gmail.com

October 2, 2026

Charleston, South Carolina

EXHIBIT INDEX

Exhibit A — Application/Petition for Probate and Appointment, filed November 22, 2013, with June 26, 2012 Last Will and Testament attached

Exhibit B — Affidavit of Marvin H. Dawson, Jr., executed October 1, 2015 and sworn/notarized October 2, 2015

Exhibit Report of Examination of Marvin H. Dawson, Jr., dated September 9, 2015

EXHIBIT A

**Application/Petition for Probate and Appointment Filed November 22, 2013
with June 26, 2012 Last Will and Testament attached**

STATE OF SOUTH CAROLINA

COUNTY OF: CHARLESTON

IN THE MATTER OF: JUNE KEA MEEKS

IN THE PROBATE COURT

FILE

2013 NOV 22 AM 10:36

*ONLY COMPLETE IF FILING PETITION FOR FORMAL TESTACY AND/OR APPOINTMENT

CASE NUMBER: 2013-ES-10-

01787 PROBATE COURT CHARLESTON COUNTY

*Patricia C. Meeks,

Petitioner

vs.

*Sheryl K. M. Johnson and Charles A. Meeks, Jr.
Respondent(s) (if applicable)

APPLICATION FOR

(check any that apply)

INFORMAL

- ☐ PROBATE OF WILL
☐ APPOINTMENT

*PETITION FOR

FORMAL

- ☐ TESTACY
☒ APPOINTMENT

Applicant/Petitioner: Patricia C. Meeks

Address: 2466 Swallow Drive, Charleston, SC 29414

Telephone: 843-766-4509

I. ALL APPLICANTS/PETITIONERS MUST COMPLETE THIS SECTION.

1. Give your relationship to the decedent, if any, and your interest in this proceeding.

Daughter/Names as Personal Representative in Last Will and Testament

2. Decedent Information

Name: JUNE KEA MEEKS

Last Four Digits of Social

Security Number: XXX-XX-8476

Date of Birth: 01/07/1930

Date of Death: 04/22/2013

Age at date of death: 83

Domicile at date of death:

Charleston
(county)

SC
(state)

3. Venue for this proceeding is proper in this county because:

- ☒
☐

Decedent was domiciled in this county at date of death.

Decedent was not domiciled in South Carolina, but property of Decedent was located in this county at date of death.



Decedent has a right to take legal action in this county because:

- 4.a. Names and addresses of devisees in the Will, including dates of birth of minors. If there are no minors, so state.

Name	Date of Birth	Address	Relationship to Decedent
N/A			

(use additional sheet if necessary)

- 4.b. Names and addresses of intestate heirs who are not devisees, including dates of birth of minors. If there are no minors, so state. Intestate heirs are the persons who would inherit if the decedent left no will.

Name	Date of Birth	Address	Relationship to Decedent
Sheryl K. M. Johnson	7/25/55	7146 Savannah Highway, Lot 7 Ravenel, SC 29470	daughter
Charles A. Meeks, Jr.,	07/25/1964	644 Hyde Park Road Ravenel, SC 29470	son
Patricia C. Meeks	03/26/1958	2466 Swallow Drive Charleston, SC 29414	daughter

(use additional sheet if necessary)

5. Did decedent have a change of marital status or the birth or adoption of any children after execution of this will, if one exists, or has any child of the decedent been born since his death, or is any birth of a child of the decedent anticipated? (This includes illegitimate children.)
- ☒ NO ☐ YES If yes, please explain, on page 3.
6. To the best of your knowledge, was the decedent a patient in a South Carolina Mental Health facility during his/her lifetime?
- ☒ NO ☐ YES If yes, please explain, on page 3.
7. Has a guardian or conservator ever been appointed for this person?
- ☒ NO ☐ YES If yes, please explain on page 3.
8. Has a personal representative of the decedent been appointed prior to this date by a Court in this state or elsewhere?
- ☒ NO ☐ YES If yes, please state details, including name and address of such Personal Representative on page 3.
9. Have you received or are you aware of any demands for notice of any probate or appointment proceeding concerning the decedent that may have been filed in this state or elsewhere?
- ☒ NO ☐ YES If yes, please state details, including names and addresses on page 3.
10. Have more than ten years passed since the decedent's death?
- ☒ NO ☐ YES If yes, please state circumstances authorizing tardy probate on page 3.
11. The decedent died with a personal estate of about the value of \$10,000.00 (estimated, to be determined) and real estate of about the value of \$50,000.00 (estimated, to be determined). (A full inventory and appraisal, Form #350PC, must be filed within 90 days.) If decedent was non-resident, please attach South Carolina Commission form ET 101.
12. After the exercise of reasonable diligence, are you aware of any unrevoked Will and/or Codicil(s), other than the one(s) attached hereto, relating to property in this State?
- ☒ NO ☐ YES If yes, please explain on page 3 and then proceed to Section II.

II. IF A WILL EXISTS, PLEASE COMPLETE THIS SECTION.

1. Regarding the decedent's Will:

- ☐ The original is attached
- ☐ The original is in the Court's possession
- ☐ An authenticated copy of a Will probated in another jurisdiction is attached
- ☐ An authenticated copy of a Will not probated in another jurisdiction is attached
- ☒ The Will is lost, destroyed, or otherwise unavailable, however, a description of its contents is attached

2. Do you believe, to the best of your knowledge, the Will described above was validly executed?

- ☒ YES ☐ NO If no, please explain on page 3.

3. The date of execution of the Will was: June 26, 2012

Codicil(s): N/A

4. Are you aware of any instrument or document amending or revoking the Will?

☒ NO

☐ YES If yes, please explain on page 3.

5. Have you exercised reasonable diligence to determine there is no instrument or document revoking the Will?

☒ YES

☐ NO If no, please explain on page 3.

6. Do you believe the Will defined in "1" above is the decedent's last Will?

☒ YES

☐ NO If no, please explain on page 3.

COMPLETE EXPLANATION (S) FOR QUESTIONS IN SECTIONS I and II HERE.
(If more space is required, use additional sheet.)

The original of decedent's Last Will and Testament, dated June 26, 2012, cannot be located, however, a photocopy of said document is attached hereto.

III.: IF APPLYING FOR INFORMAL OR FORMAL APPOINTMENT, PLEASE COMPLETE THE FOLLOWING.

1. The name(s) and address(es) of the proposed Personal Representative(s) is/are:

Patricia C. Meeks

2. Priority for this appointment is:

- ☒ named as Primary Personal Representative in Will
☐ named as Alternate Personal Representative in Will
☐ nominee of above Primary Personal Representative in Will
☐ nominee of above Alternate Personal Representative in Will
☐ surviving spouse of decedent who is devisee of decedent or nominee of said spouse
☐ other devisee of decedent, (describe): Son or nominee of said devisee
☐ surviving spouse of decedent or nominee of said spouse
☒ other heir of decedent (describe): Daughter and nominee of decedent's heir (son)
☐ creditor (Forty-five days after death must have passed), or nominee of creditor
☐ other (describe): _____

3. List below the names of any other persons, if any, having a prior or equal right of appointment (see priority above).

Charles A. Meeks, Jr., and Sheryl K. M. Johnson

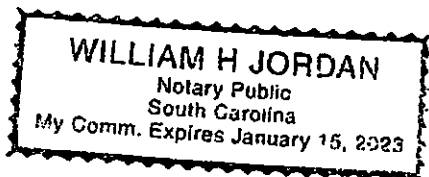
IV. ALL APPLICANTS/PETITIONERS MUST COMPLETE VERIFICATION.

VERIFICATION

The undersigned, being sworn, states that the facts set forth in the foregoing statement are true to the best of the undersigned's knowledge, information and belief, and hereby submits to the Court's jurisdiction in this matter.

SWORN to before me this 30 day of
October, 20 13

William H Jordan
Notary Public for South Carolina
My Commission Expires: 1/15/2023



Signature: [Signature]
Name: Patricia C. Meeks
Address: 2466 Swallow Dr.
Charleston, SC 29414
E-mail: _____
Telephone (O): _____
(H): 843-766-4509

Signature: [Signature]
Name: _____
Address: _____
E-mail: _____
Telephone (O): _____
(H): _____

ORDER OF INFORMAL PROBATE

IT IS HEREBY ORDERED that the above application for probate of a will be ☐ GRANTED ☐ DENIED informally
this _____ day of _____, 20 13.

_____, Probate Court Judge

ORDER OF FORMAL TESTACY

On hearing of the above petition, this Court finds that the person is deceased, venue is proper, and the proceeding was commenced within appropriate time limits.

The Court further finds that

☐ the decedent died intestate. The heirs are:

Patricia C. Meeks, Charles A. Meeks, Jr., and Sheryl K. M. Johnson

☐ the decedent died testate. IT IS HEREBY ORDERED that the Last Will and Testament of the above-named decedent, dated _____, be admitted formally to probate.

Executed this _____ day of _____, 20____.

, Probate Court Judge

SEE ATTACHED ORDER

ORDER OF APPOINTMENT

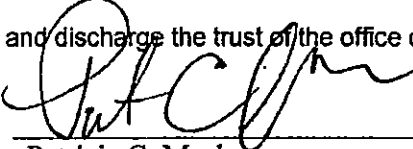
IT IS HEREBY ORDERED that the above Application/Petition for appointment be granted upon the filing of a bond as appropriate, qualification, and acceptance.

Executed this _____ day of _____, 20____.

, Probate Court Judge

QUALIFICATION AND STATEMENT OF ACCEPTANCE

I accept this appointment and agree to perform the duties and discharge the trust of the office of Personal Representative of this estate.

Signature: 
Name: Patricia C. Meeks
Address: 2466 Swallow Drive
Charleston, SC 29414
E-mail: _____
Telephone (O): _____
(H): 843-766-4509

Signature: _____
Name: _____
Address: _____
E-mail: _____
Telephone (O): _____
(H): _____

Attorney: _____
Address: _____
E-mail: _____
Telephone (O): _____

LAST WILL AND TESTAMENT

OF

JUNE K. MEEKS

I, June K. Meeks a resident and domiciliary of Charleston, South Carolina, being of sound and disposing mind, memory, and understanding, and of my own free will and volition, do hereby make, publish, and declare the following to be my Last Will and Testament, and do hereby revoke all other Wills and Codicils and any other testamentary instruments previously made by me.

Funeral Expenses. I direct that my Personal Representative dispose of my bodily remains as directed in my letter of instructions, which is attached hereto, and to thereafter pay all my funeral and burial expenses. If no instructions are attached, I direct my Personal Representative to make whatever arrangements which she shall judge are appropriate.

Debts. I further direct my Personal Representative to pay all of my legal obligations and debts. In determining what are my obligations and debts, I direct my Personal Representative avail herself of every legal defense that would have been available to me.

Property. I hereby bequeath the sum of Two Thousand Dollars and No/100 (\$2,000.00) to my daughter, **SHERYL K. M. JOHNSON**, which shall constitute her entire inheritance and that of her spouse, children, and any descendants. All of the remainder of my estate to include all property, both real and personal, shall be equally divided between my son, **CHARLES A. MEEKS, JR.** and my daughter, **PATRICIA C. MEEKS**. Should either **CHARLES A. MEEKS, JR.** or **PATRICIA C. MEEKS** predecease me, then their divided share shall go to the survivor of the two aforementioned heirs.

June K. Meeks

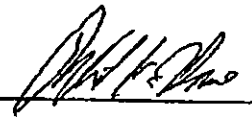
Fiduciary Powers. In the administration of my estate, the Personal Representative shall have all the powers set forth by statute, including the power of sale over real estate, and the same shall be liberally construed.

Appointment of Personal Representative(s). I nominate, constitute, and appoint my daughter, PATRICIA C. MEEKS, as the Personal Representative of my estate. My Personal Representative shall not be required to give any bond or other surety or security of any kind. My Personal Representative shall receive, unless waived, compensation for services rendered as allowed by law.

I, June K. Meeks, the testatrix, sign my name to this instrument this 26th day of June, 2012, and being first duly sworn do hereby declare to the undersigned authority that I sign and execute this instrument as my Last Will and Testament and that I sign it willingly, that I execute it as my free and voluntary act for the purposes therein expressed, and that I am eighteen years of age or older, of sound mind, and under no constraint or undue influence.


JUNE K. MEEKS, Testatrix

The foregoing Last Will and Testament of June K. Meeks, consisting of Four (4) typewritten pages, including this attestation page and attached self-proving page, was on the 26 day of June, 2012, subscribed, sealed, published, and declared by the said June K. Meeks, testatrix herein, as his Last Will and Testament and we at her request and in her presence and in the presence of each other, have subscribed our names as attesting witnesses on the day and year last above written.

 of Charleston
South Carolina

Donald W Eadie ^{SR.} of 1710 Mudville, SC
Ridgeville, SC 29472

State of South Carolina)

County of Charleston)

Before me, the undersigned notary, on this 26 day of June, 2012, appeared June K. Meeks, AND Robert G. Howe, AND Donald W. Eadie, Sr. known to me to be the Testatrix and the witnesses, respectively, whose names are signed to the attached of foregoing instrument and all of these persons being by me first duly sworn, June K. Meeks, the Testatrix, declared to the witnesses in my presence that said instrument is her Last Will and Testament and that she has willingly signed and executed it in the presence of said witnesses as her free and voluntary act for the purposes therein expressed; that said witnesses stated before me that the foregoing was executed and acknowledged by the Testatrix as her Last Will and Testament in the presence of said witnesses who, in her presence and at her request, and in the presence of each other, did subscribe their names thereto as attesting witnesses on the day of the date of said Will, and that the Testatrix, at the time of the execution of said Will, was over the age of 18 years and of sound and disposing mind and memory.

June K. Meeks
June K. Meeks, Testatrix

Robert G. Howe
Witness

Donald W Eadie SR.
Witness

Subscribed, sworn and acknowledged before me by June K. Meeks, the Testatrix,
and subscribed and sworn before me by
and Robert G. Howe, Donald W. Eddie, Sr., witnesses, this
26th day of June, 2012.

Deborah M. Williams
Notary Public for South Carolina
My Commission Expires: 7-10-2019

EXHIBIT B

Affidavit of Marvin H. Dawson, Jr. Executed October 1, 2015

Sworn/Notarized October 2, 2015

STATE OF SOUTH CAROLINA	)	IN THE PROBATE COURT
	)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON	)	CASE NO. <u>2013-ES-10-001787</u>
	)	
IN THE MATTER OF: ESTATE OF	)	
JUNE K. MEEKS, ALSO KNOWN AS	)	
JUNE KEA MEEKS,	)	
	)	AFFIDAVIT OF MARVIN H. DAWSON, JR.
Decedent.	)	
	)	
	)	

PERSONALLY APPEARED before me MARVIN H. DAWSON, JR., A FORENSIC DOCUMENT EXAMINER, who being duly sworn does state as follows:

1. THAT I am a forensic document examiner and provide by professional services through Dawson Document Laboratory, LLC, with its principal office located at 122 Hollyridge Road, Spartanburg, South Carolina 29301.
2. THAT Lester S. Schwartz, Attorney at Law for Patricia C. Meeks, Personal Representative of the Estate, requested my services in examining the Charleston County Probate Court File Number: 2013-ES10-001787, of the Estate of June K. Meeks, to determine if any of the copies of the documents on file in the Charleston County Probate Court as the Last Will And Testament of June K. Meeks dated June 26, 2012, is the originally executed copy of the document filed as the Last Will And Testament of June K. Meeks dated June 26, 2012.
3. THAT on September 3, 2015, I examined the following documents at the Charleston County Probate Court, located in the Historic Courthouse, 84 Broad Street, Third Floor, Charleston, South Carolina 29401:

ITEM 1: Last Will And Testament of June K. Meeks dated June 26, 2012, consisting of four (4) pages, clocked 06-23-14, machine copy. Hereinafter this document is referred to as "ITEM 1";

AFFIDAVIT OF MARVIN H. DAWSON, JR.

Page 1

ITEM 2: Last Will And Testament of June K. Meeks dated June 26, 2012, consisting of four (4) pages, clocked 12-03-13, machine copy. Hereinafter this document is referred to as "**ITEM 2**";

ITEM 3: Last Will And Testament of June K. Meeks dated June 26, 2012, consisting of four (4) pages, no clock, machine copy. Hereinafter this document is referred to as "**ITEM 3**"; and

ITEM 4: The original inked Last Will And Testament of June K. Meeks dated June 26, 2012, consisting of four (4) pages, provided to me by Ms. Alison Atwood, a staff member of the Charleston County Probate Court. Hereinafter this document is referred to as "**ITEM 4**". ITEM 4 was returned to Ms. Atwood upon completion of my examination.

4. THAT the purpose of my examination of ITEM 1, ITEM 2, ITEM 3 and ITEM 4 was to determine, if possible, whether any of the before mentioned four (4) documents was the originally executed copy of the Last Will And Testament of the Decedent, June K. Meeks, dated June 26, 2012, containing the Decedent's original inked signature.

5. THAT I performed the examination, comparison and evaluation of ITEM 1, ITEM 2, ITEM 3 and ITEM 4 using reliable principles and methods of forensic document examination and in accordance with the standard practices and procedures of the field.

6. THAT I noted that ITEM 1, ITEM 2 and ITEM 3 were in the Charleston County Probate Court File Number: **2013-ES10-001787**, for the Estate of June K. Meeks, and I examined ITEM 1, ITEM 2 and ITEM 3 microscopically.

7. THAT based on my examination, neither ITEM 1, nor ITEM 2, nor ITEM 3 bears an original inked signature of June K. Meeks. The Decedent's signature on ITEM 1, ITEM 2 and ITEM 3 is a machine copy.

8. THAT I was informed to contact Charleston County Probate Court staff for purposes of examining another copy of the Last Will And Testament of June K. Meeks dated June 26, 2012 that the Charleston County Probate Court kept secured and not in the Charleston County Probate Court File Number: 2013-ES10-001787.

9. THAT I inquired and Ms. Allison Atwood of the Charleston County Probate Court provided ITEM 4 to me for my examination.

10. THAT based on information and belief, ITEM 4 had been in the custody and control of Ms. Alison Atwood of the Charleston County Probate Court since it was submitted to the Charleston County Probate Court.

11. THAT based on my examination, it is my opinion and belief that ITEM 4 is the original inked Last Will And Testament of June K. Meeks, dated June 26, 2012, from which ITEM 1, ITEM 2 and ITEM 3 had been machine copied.

12. THAT after I completed my microscopic examination of ITEM 4, it was returned to Ms. Alison Atwood for custody and control.

FURTHER THE AFFIANT SAYEST NOT.

I MARVIN H. DAWSON, JR., do hereby execute this Affidavit this 10-1, 2015.


MARVIN H. DAWSON, JR.

(SEAL)

AFFIDAVIT OF MARVIN H. DAWSON, JR.

Page 3

STATE OF SOUTH CAROLINA)

COUNTY OF CHARLESTON)

SWORN TO BEFORE ME by MARVIN H. DAWSON, JR., the Affiant, on the 2
day of October, 2015.

Amy B. Bright

(SEAL)

Notary Public for State of South Carolina

My Commission Expires:

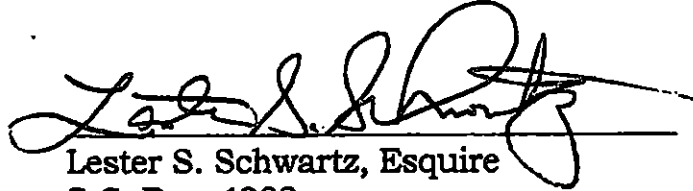
4-22-23

Print Name of Notary:

Amy B. Bright

Respectfully submitted by,

Dated: December 2, 2015
Charleston, S.C.

A handwritten signature in black ink, appearing to read "Lester S. Schwartz", written over a horizontal line.

Lester S. Schwartz, Esquire
S.C. Bar: 4982
708 St. Andrews Boulevard
P.O. Box 30356
Charleston, South Carolina 29417-0356
Telephone: (843) 571-7919
Fax: (843) 571-0881
Lester.Schwartz@sctaxlawyer.com
Attorney for Petitioner, Patricia C. Meeks,
Personal Representative Of The Estate of
June Kea Meeks

EXHIBIT C

Report of Examination of Marvin H. Dawson, Jr.

Dated September 9, 2015



MARVIN H. DAWSON, JR.
FORENSIC DOCUMENT EXAMINER

DIPLOMATE AMERICAN BOARD
OF FORENSIC DOCUMENT EXAMINERS

AMERICAN ACADEMY
OF
FORENSIC SCIENCES

AMERICAN SOCIETY
OF
QUESTIONED DOCUMENTS EXAMINERS

SOUTHEASTERN ASSOCIATION
OF FORENSIC DOCUMENT EXAMINERS

September 9, 2015

VIA-Email

Lester S. Schwartz, Esquire
708 Saint Andrews Blvd.
Charleston, South Carolina 29417

Re: June Kea Meeks
DDL File No.: 156343
Charleston County Probate File 2013 ES 001787

Report of Examination

The following documents were examined in Charleston County Probate Office September 3, 2015:

- Item 1 Last Will and Testament of June Kea Meeks, 4 pages, clocked 06-23-14, machine copy
- Item 2 Last Will and Testament of June Kea Meeks, 4 pages, clocked 12-03-13, machine copy
- Item 3 Last Will and Testament of June Kea Meeks, 4 pages, no clock, machine copy
- Item 4 Original inked Last Will and Testament of June Kea Meeks was provided to this examiner by Ms. Allison Atwood, a staff member with Charleston County Probate Office. The Last Will and Testament document (# 4) was returned to Ms. Atwood upon completion of the examination.

Purpose of the Examination

The previously described documents were submitted for the purpose of determining, if possible, which Last Will and Testament document contained the *original inked signature* of June K. Meeks.

Examination and Findings

Attorney Lester S. Schwartz requested examination of the file of June K. Meeks, File No.: 2013 ES 001787. The examination took place in the Charleston County Probate Office September 3, 2015.

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Results of the Examination

The examination, comparison and evaluation of the submitted documents were performed using reliable principles and methods of forensic document examination and in accordance with the standard practices and procedures of the field.

Three (3) copies of the Last Will and Testament of June K. Meeks were noted in Charleston County Probate File No: 2013 ES 001787. All copies were examined microscopically.

Item #1 Will - clocked 06-23-14
Item #2 Will - clocked 12-03-13 and,
Item #3 Will - undated.

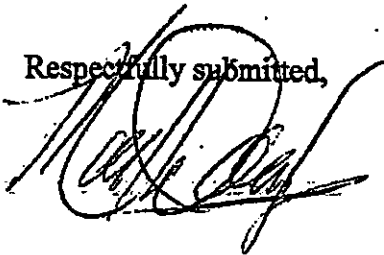
The Last Will and Testament of June K. Meeks Items #1, #2, and #3 do not bear an original inked signature of June K. Meeks. However, the decedent's signature is a machine copy. I was instructed to contact Charleston County Probate staff for another Will of June K. Meeks. Upon an inquiry, Ms. Allison Atwood provided a 4th June K. Meeks Last Will and Testament for examination. The 4th Last Will and Testament had been in the custody and control of Ms. Atwood since its submission to the Charleston County Probate Court. The 4th Will is the *original inked* Last Will and Testament from which the 3-Probate File (No: 2013 ES 001787) Wills had been copied.

After a microscopic examination the 4th Last Will and Testament, of June K. Meeks, was returned to Ms. Atwood for custody.

Remarks

1. A copy of the 4th Last Will and Testament is forwarded with this report.
2. A copy of this report will be in DDL File No.: 156343 and placed in storage for 6 years after which it may be destroyed.

Respectfully submitted,



D-ABFDE

Marvin H. Dawson, Jr.
Forensic Document Examiner
Dawson Document Laboratory, LLC

MHD/abb

CERTIFICATE OF SERVICE

I certify that on October 2, 2026, I served a true and correct copy of the foregoing Appellant's Motion for Leave to File Rule 60(b), SCRCP, Motion in Circuit Court, for Limited Remand, and to Hold Appellate Deadlines in Abeyance, together with its attachments, by United States Mail, first-class postage prepaid, addressed as follows:

C. Mac Gibson, Jr., Esquire

Attorney for Christina Wynn

21 Gamecock Avenue, Suite A

Charleston, South Carolina 29407

s/ Patricia C. Meeks

Patricia C. Meeks

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RETURN RECEIPT
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Appellate Case #
2026-004766