THE ST0 ATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 12 2026
SC Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable Michael Jordan
Master in Equity

CASE NO. 2025-002220

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 Gilespie, 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

APPELLANT'S RETURN TO RESPONDENT'S MOTION TO DISMISS

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The Appellant, acting pro se, respectfully submits this Return in opposition to Respondent's Motion to Dismiss the Appeal and shows the Court the following:

1. The Record on Appeal Was Entirely Timely

`1. Respondent vaguely asserts that Appellant is "out of compliance."However, the Record was fully finalized and filed with the Clerk of the Appellant Court on September 17, 2026, which was well within all mandated appellate timelines.`` I received a letter from the South Carolina Court of Appeals on September 8, 2026, stating within (10) days from the date of this letter, the record on appeal has to be filed.

II. Service was fully Satisfied via U.S. Mail

2. Respondent claims a defect in the proof of service. However under Rule 262 of the SCACR, service is complete upon mailing.

3. Appellant explicitly served the Respondent with the Record on Appeals via the United States Postal Service on September 17, 2026. Attached hereto as Exhibit A, is the official postal receipt demonstrating the exact date of mailing.

Respondent's claim is factively contradicted by objective postal records.

III. The Judge's Memorandum Was Legally and Properly Included

4. Respondent alleges that Appellant improperly included the Master-in-Equity's

written memorandum because it did not appear on Respondent's Designation (DIM). This is an incorrect application of the rules

5. Under Rule 210 (c) of the SCACR, the Final Record on Appeal "shall include. all matter designated to be included by any party under Rule 209.

6 Appellant explicity listed the Master's memorandum on Appellant's timely filed (DIM), under Rule 209. Because the rules states the record must contain items selected by any party, Appellant was procedurally required to include it.

7. The Exhibits, 1-~~11~~ 12 will show that the Death Certificates,, 2000 DOT, title cloud and the letters from the attorney, admitting a lack of research and also on the Title to Real Estate, stated by attorney that there was no title search performed by his Law office.

8. These documents are vital to the merits of this appeal. They conclusively demonstrates that the underlying ~~2024~~ 2025 order drafted by Respondent's counsel, inaccurately reflects the Master-in-Equity actual findings and ignores critical evidence proving non-descendant status.

Crucially, Appellant's mother was the granddaughter of the actual owner of the subject property, establishing a direct, lawful line familial descent.

Despite this, Appellants were completely left in the dark for 28 years, 1996-

2024 , maintaining continuous public ownership on file with the Assessor's ,tax Office, 1996 and the Clerk of Court's Office 2006. Appellants were never contacted, notified or served by anyone regarding any changes to the title during this entire 28 year period., only discovering the improper transfer when the annual tax statement failed to arrive at my address. When inquired is when I found that my name had been replaced. The relevant Death Certificates and the DOT title cloud records are essential to prove this lineage and show that Respondent counsel improperly used a Probate Court transfer to divert heirs property to a non-descendant. To dismiss this appeal now would permanently legitimize a severe violation of due process and a deprivation of family property. .

IV. Any Alleged Binding Defect is a harmless Technical Oversight and Does Not Warrant Dismissal.

9. Respondent asserts that the copy of Record on Appeal served upon them was not bound in compliance with Rue 210(a). Appellant acting pro se, filed a perfectly bound copy in white directly with the Clerk of the Appellant Court in strict compliance with the rules.

10. To the extent that the copy mailed to Respondent lacked a heavy tape binding on its spine under Rule 267(d) such an oversight is a minor, harmless technical

defect. Respondent received the complete, identical, unredacted and timely contents of the Record on Appeal on September 17, 2026. Respondent has suffered zero harm.

11 South Carolina Electronic Filing (SCEF), and the South Carolina Rules of Appellant Procedure , (SCACR) an Attorney cannot use e-filing to submit an appeal or other documents without the appellant's authorization.

CONCLUSION

Appellant did comply with all requirements of the Appellant Court Rules, to include filing in a timely matter and mailing of the proof of service , Therefore with all of the evidence presented, the Motion to dismiss this Appeal in its entirety and in the Alternative, that the Court should strike the Appellant's Record on Appeal and require the Appellant to re-file her Record on Appeal should be denied.

Respectfully Submitted:
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Columbia, South Carolina
October 12, 2026

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CELESTINE PARKER_____PRO SE ATTORNEY
APPELLANTS

LORETT BLACK_____APPELLANTS

VALARIE McCRAY_____--RESPONDENT

PROOF OF SERVICE

The undersigned Pro Se Attorney do hereby certifies that a true copy of the Appellant's Return to Respondent's Motion to Dismiss served upon counsel of record by mailing a copy in an envelope properly address with postage prepaid on October 12, 2026 to Charles Brooks, Attorney.

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(UP TO 25 ITEMS)

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PURCHASE DETAILS

Product	Qty	Unit Price	Price
Mailer 10.5x16	1	$3.19	$3.19
USPS Grnd Advtg	1		$11.30
Sumter, SC 29151 Weight: 2 lb 3.70 oz Estimated Delivery Date Mon 09/21/2026 Tracking #: 9534 6103 2372 6260 7582 18			
Insurance Up to $100.00 included			$0.00
Total			$11.30
Grand Total:			$14.49

Exhibit A