

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

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Oct 28 2026
SC Court of Appeals

Appellate Case No. 2026-001949

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas, Case No. 2022-CP-10-5370

The Honorable Mikell R. Scarborough, Master-in-Equity

JOHN JAMES GEIGES, JR. and SUELY GEIGES, Appellants,

v.

JALORIE J. ROBINSON, Respondent.

**DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

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Counsel for Appellants

Pursuant to Rule 209, SCACR, Appellants designate the following materials presented to the Master-in-Equity for inclusion in the Record on Appeal. The designated items bear directly upon the historical deeds and plats, the location of the disputed boundary, the Master's findings and later identified uncertainty, the requests for further surveying, and the preservation and disposition of the issues raised on appeal.

I. PLEADINGS, ORDERS, AND POST-TRIAL FILINGS

1. Summons and Complaint, filed November 21, 2022, in its entirety, including exhibits filed with the pleading concerning the ownership and boundary claims.
2. Defendant Jalorie Robinson's affidavit, filed July 7, 2023, to the extent it sets out her response to the pleaded boundary and title allegations and the historical property claim.
3. Master-in-Equity's Order on Resolution of Property Line Dispute, filed September 25, 2025, in its entirety.
4. Appellants' Motion for Reconsideration, filed October 6, 2025, in its entirety.
5. Appellants' Memorandum in Support of Motion to Reconsider, filed December 4, 2025, in its entirety, with the exhibits actually presented to the Master.
6. Appellants' Status Report and Request for Appointment of Neutral Surveyor, filed August 5, 2026, in its entirety.
7. Order/Electronic Form 4 denying reconsideration, filed August 5, 2026, in its entirety.
8. Notice of Appeal filed August 13, 2026, its proof of service, the corrected notice submitted August 28, 2026, and proof of service of the corrected notice, solely insofar as material to appellate jurisdiction and the identification of orders appealed.

II. TRANSCRIPTS OF PROCEEDINGS

9. September 23, 2025 nonjury trial transcript: original court-reporter pages 3–52 and 56–64, encompassing the parties’ presentation, surveying testimony, original grants and plats, admission of the disputed boundary exhibits, and the court’s examination of the historic line. The reporter’s page numbering is to be retained.

10. December 10, 2025 Rule 59(e) hearing transcript: original court-reporter pages 3–36 and 38–40, encompassing the reconsideration arguments, discussion of the original line and approximately fifty-foot rear segment, the Master’s stated understanding of the order, the conditional proposal for third-party surveying, and the directives for site inspection.

11. August 5, 2026 proceeding transcript: original court-reporter pages 3–22, encompassing the unsuccessful site consultation, renewed request for neutral surveying, statements concerning monuments and the absence of agreement, arguments concerning Lot A, refusal to receive further testimony, and denial of reconsideration.

III. EXHIBITS ADMITTED AT THE SEPTEMBER 23, 2025 TRIAL

12. Plaintiffs’ Exhibit 1: 2005 Kennerty Surveying subdivision plat (Plat Book EK, Page 53), depicting Lot 4 and associated boundary features.

13. Plaintiffs’ Exhibit 2: GEL Engineering survey of neighboring land, including the line measurements, monument references, and annotations discussed by the surveying witness.

14. Plaintiffs’ Exhibit 3: 1952 W.L. Gaillard/Abbott Middleton subdivision plat (Plat Book H, Page 90).

15. Plaintiffs’ Exhibit 4: 1962 Kenyon Millard/Lake Ackerman plat (Plat Book Y78, Page 274), depicting Lot A and the rear-line configuration.

16. Plaintiffs' Exhibit 5: deed conveying the subject property to the Geiges, admitted at trial.
17. Plaintiffs' Exhibit 6: Robinson's Master's Deed, admitted at trial.
18. Defendant's Exhibit 1: Atlas Surveying exhibit depicting Robinson's claimed boundary and the area of overlap.
19. Defendant's Exhibit 2: 1952 deed from G. Abbott Middleton, Jr. to Walter Myers.
20. Defendant's Exhibit 3: Charleston County property record/GIS materials concerning Robinson's parcel.

For the trial exhibits, Appellants designate the versions admitted in evidence, including markings or annotations reflected in those versions. The original trial exhibit numbers control; the descriptions above should be checked against the official reporter's exhibit inventory when compiling the Record on Appeal. The designated post-trial exhibits are limited to materials actually presented to the Master.

The signature below constitutes the certification required by Rule 209(c), SCACR, that no matter irrelevant to this appeal has been included in this Designation.

Respectfully submitted,

WHITSITT LAW FIRM, LLC

s/ Michael A. Whitsitt
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Dated: October 28, 2026

CERTIFICATE OF SERVICE

I certify that on October 28, 2026, I served a true and correct copy of Appellants' Designation of Matter to Be Included in the Record on Appeal upon Respondent Jalerie J. Robinson, appearing pro se, by depositing it in the United States Mail, first-class postage prepaid, addressed to Jalerie J. Robinson, 5 Hamilton Street, Goose Creek, South Carolina 29445.

s/ Michael A. Whitsitt

Michael A. Whitsitt

Date: October 28, 2026

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