

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

The Honorable Marvin H. Dukes, III, Master in Equity and Special Circuit Court Judge

Court of Appeals Case No. 2012-213578/
Beaufort Case No. 09-CP-07-2608

Lucille Patricia Smith, Respondent

v.

The Heirs at Law of Benjamin Days a/k/a Ben Deas a/k/a Daise, the Heirs at Law of Samuel Daise, the Heirs at Law of Anna Daise, the Heirs at Law of Manny Daise, the Heirs at Law of Georgie Daise, the Heirs at Law of Marie Daise Middleton, the Heirs at Law of Rose Middleton, the Heirs at Law of Charlie Middleton, the Heirs at Law of W.H. Deas, Howard Chaplin, Harriet Chaplin and all other persons unknown, having or claiming any rights, title or interest in or lien upon the real property described in the Complaint herein, being designated collectively as JOHN DOE or SARAH ROE, including all minors, persons in the Armed Forces, and insane persons and all other persons under any other disability who might have or claim to have any right, title, estate or interest in or lien upon the real property described in the Complaint herein
of whom Hoard Chaplin and Harriet Chaplin are Appellants

CERTIFICATE OF COUNSEL

The undersigned counsel hereby certifies that her Final Brief complies with Rule 211(b), SCACR.

EVERSOLE LAW FIRM, P.C.

By: 

Alysoun M. Eversole
1509 King Street
Beaufort, SC 29902
Telephone (843)379-3333
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Attorney for Respondent Lucille Patricia Smith

January 21, 2014

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SC Court of Appeals

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of whom Hoard Chaplin and Harriet Chaplin are Appellants

**CERTIFICATE OF SERVICE BY MAIL OF
RESPONDENT'S FINAL BRIEF**

The undersigned attorney for the Respondent hereby certifies that on the 21st day of January, 2014, she served by first class mail, postage prepaid, three (3) true and correct copies of Respondent's Final Brief, corrected pursuant to letter from Court of Appeals dated January 15, 2014, to Bruce R. Hoffman, Esquire, Law Office of Bruce R. Hoffman, LLC, 574 Sea Island Parkway, St. Helena Island, SC 29920, attorney for Appellant.

Beaufort, SC

21st day of January 2014


Sarah J. Crews
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SC Court of Appeals

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January 21, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Lucille Patricia Smith, Respondent v. Howard Chaplin, et al, Appellants
Court of Appeals Case No.: 2012-213578

Dear Ms. Kitchings:

Enclosed for filing please find the original and fifteen (15) copies of Respondent's Final Brief, corrected pursuant to letter dated January 15, 2014, a copy of which I have attached hereto, and the original Certificate of Service. Thank you.

Sincerely,



Sarah J. Crews, Asst to
Alysoun M. Eversole

Enclosures

cc: Bruce R. Hoffman, Esq.
Lucille Patricia Smith

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SC Court of Appeals



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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January 15, 2014

Ms. Alysoun M. Eversole
1509 King St.
Beaufort SC 29902

Re: Lucille Smith v. The Heirs at Law of Benjamin Days
Appellate Case No. 2012-213578

Dear Counsel:

Upon reviewing your respondent's final brief, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The caption/title does not comply with Rule 267(a), SCACR. Specifically, the caption must not be abbreviated.
- The document is not accompanied by the required certificate of counsel.
- Pursuant to Rule 267(a), SCACR, only the name of the counsel submitting the brief shall appear on the cover.

Very truly yours,

Handwritten signature of Jenny A. Kitchings in cursive script.
CLERK

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cc: Bruce Robert Hoffman, Esquire

JAN 22 2014

SC Court of Appeals