

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

RESPONDENT'S FINAL BRIEF

EVERSOLE LAW FIRM, P.C.
BY: ALYSOUN M. EVERSOLE,
Attorney for Respondent Lucille Patricia Smith
1509 King Street
Beaufort, SC 29902
(843) 379-3333

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
Facsimile (843)379-5558
Attorney for Respondent Lucille Patricia Smith

January 21, 2014

RECEIVED

JAN 22 2014

SC Court of Appeals

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 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
EVERSOLE LAW FIRM, P.C.
1509 King Street
Beaufort, SC 29902
(843) 379-3333

RECEIVED

JAN 22 2014

SC Court of Appeals

Alysoun M. Eversole
Attorney at Law
EVERSOLE LAW FIRM, P.C.
1509 King Street
Beaufort, SC 29902

Phone: (843)379-3333

aeversole@eversolelaw.com

Facsimile: (843)379-5558

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

RECEIVED

JAN 22 2014

SC Court of Appeals