

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Honorable Mikell R. Scarborough, Master-in-Equity

Case No. 2010-CP-10-8732

Lashanda Ravenel and Henry Lee Ravenel, II.....Petitioners,

v.

Equivest Financial, LLC.....Respondent.

v.

Mary M. Scarborough, Delinquent Tax Collector for Charleston County; AAA Plumbing, LLC; Pep Boys, Manny, Moe and Jack; Monogram Credit Card Bank of Georgia; Discover Bank; SC Federal Credit Union; Alabama Credit Corp., d/b/a Preferred Teachers Association.....Cross-Defendants.

Supreme Court Case No. 2014-000320

**PETITIONERS' REPLY TO RESPONDENT'S RETURN TO
MOTION TO TAKE JUDICIAL NOTICE**

Petitioners, for their reply to Respondent's return to motion to take judicial notice allege:

Respondent alleges the Court of Appeals made no finding concerning who owns the property today, but only found the deed to Petitioners was ineffective.

If the deed was ineffective, as the Court of Appeals ruled and Respondent agrees, title must be vested somewhere at all times. The deed being ineffective, title remains in the name of Mrs. Ravenel. "The fee had to be in someone." *Des Champs v. Mims*, 148 S.C. 52, 145 S.E. 623 (1928).

Respondent states, “[t]he content of the Record on Appeal is closed and cannot be supplemented with information about proceedings taking place after the appeal concludes ...”

The content of the Record on Appeal is not closed for Petitioners have made a request to supplement the Record on Appeal pursuant to SCACR Rule 212.

Respondent states the Petition to Take Judicial Notice of certain proceedings are immaterial to the Petition for a Writ of Certiorari, which is inaccurate. Until such time as the Supreme Court rules, the Circuit Court does not have jurisdiction to entertain a new lawsuit involving the same subject matter which is before the Supreme Court.

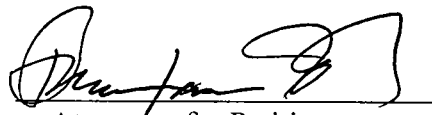
In addition, the principle of judicial economy is involved.

Respectfully submitted,

Barry I. Baker
One Carriage Lane, Bldg. H
Charleston, South Carolina 29407
(843) 766-9007

-and-

Benjamin Goldberg
One Carriage Lane, Bldg. H
Charleston, SC 29407
(843) 769-4595

By: 
Attorneys for Petitioners

March ^{4th}, 2014

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
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Honorable Mikell R. Scarborough, Master-in-Equity

Lashanda Ravenel and Henry Lee Ravenel, II.....Petitioners,

v.

Equivest Financial, LLC.....Respondent.

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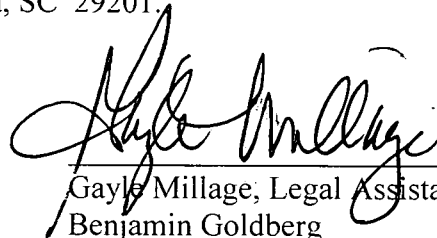
Mary M. Scarborough, Delinquent Tax Collector for Charleston County; AAA Plumbing, LLC; Pep Boys, Manny, Moe and Jack; Monogram Credit Card Bank of Georgia; Discover Bank; SC Federal Credit Union; Alabama Credit Corp., d/b/a Preferred Teachers Association.....Cross-Defendants.

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PROOF OF SERVICE

I certify that I have served Petitioners' Reply to Respondent's Return to Motion to Take Judicial Notice, on Equivest Financial, LLC by sending a copy of it, postage prepaid, via the United States Postal Service, on March 4, 2014, addressed to its attorneys of record, S.R. Anderson, Esquire, Law Office of Steven R. Anderson, 2008 Marion Street, Suite J, Columbia, SC 29201 and James B. Richardson, Jr., Esquire, Law Office of James B. Richardson, Jr., 1229 Lincoln Street, Columbia, SC 29201.

March 4, 2014



Gayle Millage, Legal Assistant to
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March 4, 2014

The Honorable Daniel E. Shearouse
Clerk of Court, South Carolina Supreme Court
Supreme Court Building
PO Box 11330
Columbia, South Carolina 29211

Re: Lashanda Ravenel and Henry Lee Ravenel, II v. Equivest Financial, LLC
Case No. 2014-000320


Dear Mr. Shearouse:

Enclosed for filing in the captioned matter are an original and six (6) copies of Petitioners' Reply to Respondent's Return to Motion to Take Judicial Notice along with Proof of Service of same.

Thank you for your courtesies in this matter, and should you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,



Benjamin Goldberg
Enclosures

cc: S.R. Anderson, Esquire (w/enclosures)
James B. Richardson, Esquire (w/enclosures)
Barry I. Baker, Esquire (w/enclosures)

BG/gm

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