

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas
Frank R. Addy, Jr., Circuit Court Judge
2013-002319

In the Matter of the Estate of Marion M. Kay

Edward D. Sullivan, as Personal Representative
of the Estate of Marion M. Kay, Appellant/
Cross-Respondent

v.

Martha Brown and Mary Moses, Respondents/
Cross-Appellants

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SC Court of Appeals

PROPOSED RECORD ON APPEAL

Respondents/Cross-Appellants propose that the appellate record contain the following:

The PR's letter to the Respondents inviting them to request a hearing on his accountings
Grice Transcript (pp. 41- 43, 56-57, 72-73, 82, 85-87, 93, 104-105, 114, 118-122, 137,

142-146, 155, 166, 168-169, 174-176, 216)

Shorb Transcript (pp. 8, 16-18, 59-60, 62, 64-65, 67, 80, 85)

All exhibits from trial, incl. PR's accountings, inventories and appraisements and the

Collins & Lacy time sheets

All orders under appeal

Summary of Position of Defendants Moses and Brown

All post-trial motions and responses (Motion to Alter, Amend or Rehear; Request for

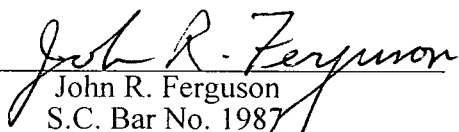
Attorney's Fee by Counsel for Appellants Moses and Brown, PR's Response to

Request for Attorney's Fee by Counsel for Appellants Moses and Brown,

Ferguson letters to Judge Addy dated 8/13/13 re attorney fee issue)

Brown and Moses' Revised Grounds for Appeal
Brief of Appellants [now Cross-Appellants] Moses and Brown
PR's Response to Brief of Appellants Moses and Brown
Documents from heirs (Presby. Home, B. Heard, M. Orias) accepting PR's terms for
settlement
PR's Grounds for Appeal without attachments (Court of Common Pleas)
Response to PR's Grounds for Appeal (Court of Common Pleas)
Revised Return to Motion to Re-Open Record
Response of Appellants Moses and Brown to Return to Motion
Addendum to Response of Appellants [Moses and Brown]
PR's Response to Appellants Brown and Moses' Motion to Alter, Amend or Rehear
Reply to PR's Response to Motion to Alter, Amend or Rehear
Reply to Addendum to Response to Appellants Moses and Brown
Ferguson letter to Judge Addy dated 7/31/13 re PR's Reply to Addendum
Any briefs or memoranda filed with Courts below by Respondents/Cross-Appellants
Return to Petition to Distribute Estate Proceeds

COX, FERGUSON & WHAM, LLC
Attorneys for the Respondents/Cross-Appellants

By: 
John R. Ferguson
S.C. Bar No. 1987
107 E. Laurens St.- P.O. Box 286
Laurens, S.C. 29360
(864) 984-2126

March 20, 2014

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Edward D. Sullivan, as Personal Representative
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Cross-Respondent

v.

Martha Brown and Mary Moses, Respondent/
Cross-Appellant

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox
Ferguson & Wham, LLC and that on the 20 day of March, 2014
she served the Proposed Record on Appeal and Initial Brief of
Respondents/ Cross-Appellants herein by depositing a copy of
them in the United States Mail, postage prepaid and addressed
to:

Daryl G. Hawkins, Esq.
Attorney at Law
P.O. Box 11906
Columbia, SC 29211.

March 20, 2014

Janet D. Walsby

COX, FERGUSON & WHAM

ATTORNEYS AT LAW
107 E. Laurens St.
P.O. Box 286
LAURENS, SOUTH CAROLINA 29360-0286

W. REID COX, JR.
JOHN R. FERGUSON
ALLEN M. WHAM

PHONE: (864) 984-2126
FAX: (864) 984-7372
E-MAIL: jferg@backroads.net

March 20, 2014

Office of the Clerk of Court
S.C. Court of Appeals
1015 Sumter St.
Columbia, SC 29201

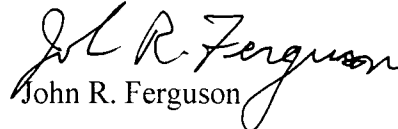
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Re: Sullivan v. Brown et al., 2013-002319

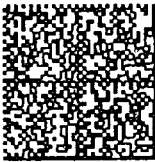
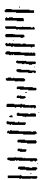
Gentlemen:


With this letter you will find enclosed an original Proposed Record on Appeal, an original Proposed Record on Appeal and a Certificate of Service for the above-referenced case plus one copy of each. Please file the originals and return clocked copies to me in the enclosed envelope. Thank you for your help.

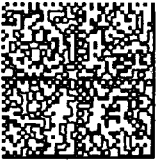
Sincerely,



John R. Ferguson

JRF/wp
Encl.
CC: Daryl G. Hawkins, Esq.



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COX, FERGUSON & WHAM, LLC
 ATTORNEYS AT LAW
 107 E. LAURENS ST. - PO BOX 286
 LAURENS, SC 29360

TO:

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