

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM MCCORMICK COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Case No. 2011-CP-35-00034

Samuel L. McPherson, as Presiding Elder of the Abbeville-Greenwood District of the  
African Methodist Episcopal (A.M.E.) Church.....Appellant-Respondent,

v.

Henry Banks, Mary Robinson, Delois Phillips, Naomi Mattison, and Frank  
Mattison .....Respondents-Appellants

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

Appellant-Respondent proposes the following be included in the Record on Appeal:

1. Summons, Complaint, Verification and Affidavit
2. Motion For Temporary Restraining Order
3. Motion For Temporary Injunction
4. Answer and Counterclaim
5. Defendants' Motion to Dismiss
6. Plaintiff's Response to Defendants Motion To Dismiss
7. Plaintiff's Amended Response to Defendants Motion To Dismiss
8. Plaintiff's Second Amended Response to Defendants Motion To Dismiss
9. Reply
10. Order
11. Rule To Show Cause
12. Order
13. Motion To Strike
14. Motion For More Definite Statement
15. Motion To Dismiss
16. Amended Motion To Dismiss
17. Motion To Grant Summary Judgment
18. Amended Motion to Grant Summary Judgment
19. Defendants' Opposition to Plaintiff's Motion
20. Order
21. Motion To Alter Or Amend

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22. Defendants' Response To Motion To Alter Or Amend
23. Order
24. Motion To Take Deposition Pending Appeal
25. Defendants' Objection To Deposition
26. Motion To Alter Or Amend
27. Order
28. Order
29. Affidavit of Henry Banks
30. Affidavit of Naomi Mattison
31. Affidavit of Frank Mattison
32. Affidavit of Mary Robinson
33. Affidavit of Delois Phillips
34. Affidavit of Delois Phillips
35. Affidavit of Naomi Mattison
36. Affidavit of Mamie Banks
37. Affidavit of Henry Banks
38. Deed- Rockford Church
39. Deed- Hillard Dunlap
40. Deed- Trustees of Colored Community
41. Deed -Town of Mount Carmel
42. Special Referee Order
43. Deed -Trustees For Rockford A.M.E.
44. Deed -Rockford Church
45. Deed- Trustees in Trust for A.M.E.
46. Deed-Trustees Rockford A.M.E.
47. Deed-Rockford Church
48. Insurance Packet
49. Transcripts Proceeding
  - a. Temporary Hearing
  - b. Rule To Show Cause
  - c. Motion For Summary Judgment
50. Depositions
  - a. Henry Banks (3-end)
  - b. Delois Phillips (1-end)
  - c. Mary Robinson (1-end)
  - d. Frank Mattison (1-end )
  - e. Frank Mattison (1-end)
51. First Citizens Bank records
  - a. 27 checks
52. Photographs of Rockford A.M.E. Church
53. Church Financial Records, statements, deposits, and cancel checks
54. Book of Discipline of the A.M.E. Church, Inc. (pgs. 53-59, 127-131)

I certify that this designation contains no matter which is irrelevant to this appeal.

April 22, 2014

A handwritten signature in black ink, appearing to read "Randall Williams", written over a horizontal line.

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Frank R. Addy, Jr., Circuit Court Judge

Case No. 2013-002236

Samuel L. McPherson, as Presiding Elder of the Abbeville-Greenwood District of the  
African Methodist Episcopal (A.M.E.) Church.....Appellant-Respondent,

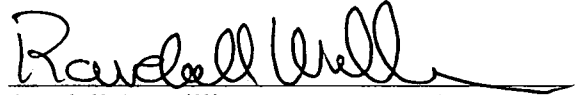
v.

Henry Banks, Mary Robinson, Delois Phillips, Naomi Mattison, and Frank  
Mattison .....Respondents-Appellants

**CERTIFICATE OF COUNSEL**

The undersigned certified that this Initial Brief complies with Rule 209 (c) SCACR.

April 22, 2014



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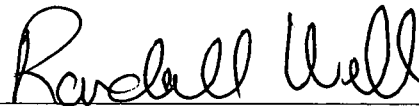
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**PROOF OF SERVICE**

I certify that I have served the Initial Brief, Designation of Matter To Be Included In The  
Record on Appeal, Certification of Counsel and Proof of Service on Henry Banks, Mary Robinson,  
Delois Phillips, Naomi Mattison, and Frank Mattison by Hand Delivery and U.S. Postal Service on  
April 22, 2014, addressed to their attorney of record, Marvin Watson at 333 Main Street, P.O. Box  
799, Greenwood, South Carolina, 29648.

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