

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. 2013-002236

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MAY 27 2014

SC Court of Appeals

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

vs.

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

RESPONDENTS-APPELLANTS' DESIGNATION OF
ADDITIONAL MATTERS TO BE INCLUDED
IN THE RECORD ON APPEAL

Respondents-Appellants Henry Banks, Mary Robinson, Delois Phillips, Naomi Mattison, and Frank Mattison ("Respondents-Appellants") respectfully request that in addition to the Appellant-Respondent's Designation of Matter to Be Included in the Record on Appeal, the following be included in the Record on Appeal.

Respondents-Appellants recognize that on October 30, 2013, the Clerk of the South Carolina Court of Appeals anticipated receiving one Record on Appeal. For

that reason, the following additional designations should be included as supplements to Appellant-Respondent's Designation of Matter to Be Included in the Record on Appeal:

1. Plaintiff's Answers to Defendants' Interrogatories
2. Plaintiff's Responses to Defendants' Requests for Production of Documents
3. Plaintiff's Motion to Dismiss and Plaintiff's Memorandum of Law in Support of Motion to Dismiss
4. Affidavit of Twyler R. Johnson
5. July 20, 2010 Deed
6. December 21, 1998 Deed
7. February 3, 1914 Deed

Because Appellant-Respondent's Designation of Matter to Be Included in the Record on Appeal does not include dates or material information necessary to properly identify the documents designated, Respondents-Appellants respectfully request that they be permitted to supplement the Record on Appeal, if necessary, once the currently designated matters are properly identified.

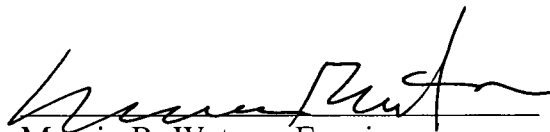
Respondents-Appellants certify that this designation contains only matters material to this appeal and cross-appeal.

Dated: May 22, 2014

Respectfully submitted,

WATSON LAW FIRM, P.A.

By:



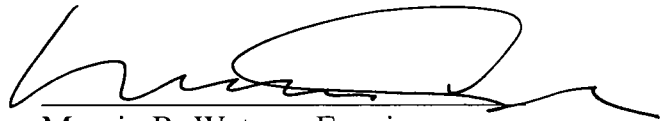
Marvin R. Watson, Esquire
333 Main Street
Post Office Drawer 799
Greenwood, SC 29648
Telephone: (864) 229-2569
Facsimile: (864) 229-1819

Attorney for Respondents-Appellants

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SC Court of Appeals

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Respondents-Appellants' Designation of Additional Matters to Be Included in the Record on Appeal to be mailed, first-class postage prepaid, to Randall R. Williams, Esquire, 110 Riley Avenue, Post Office Box 3461, Greenwood, South Carolina 29648-3461, on this 22 day of May 2014.



Marvin R. Watson, Esquire

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SC Court of Appeals

EXHIBIT C



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
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October 30, 2013

Mr. Randall Rosel Williams
110 Riley Avenue
Post Office 3461
Greenwood SC 29648-3461

Mr. Marvin R. Watson
PO Drawer 799
Greenwood SC 29648

Re: Samuel L. McPherson v. Henry Banks
Appellate Case No. 2013-002236

Dear Counsel:

This Court has received multiple notices of appeal in this matter. These appeals will be consolidated for consideration by the Court under the South Carolina Appellate Court Rules (SCACR), and we anticipate receiving one record on appeal. The times for perfecting this appeal will run from the service of the last notice of appeal.

In light of this consolidation, the title of this case is amended as follows:

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.

Very truly yours,

V. Claire Allen, Deputy

CLERK

Attorneys and Counselors at Law

Watson Law Firm

333 Main Street
P.O. Drawer 799
Greenwood, South Carolina 29648

Marvin R. Watson
Thomas P. Austin
Velvet B. Davis

May 22, 2014

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CERTIFIED MAIL - FAX

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MAY 27 2014

SC Court of Appeals

Ms. Amelia Smith
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: 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. Case No: 2013-002236

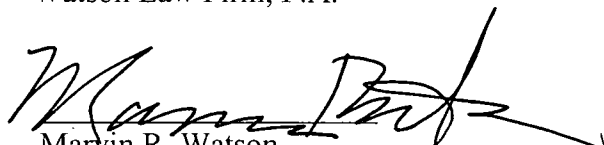
Dear Ms. Smith,

Pursuant to our telephone conversations I am enclosing the following;

1. Respondents-Appellants' Motion For Leave To File Initial Appellate Brief Of Respondents - Appellants Out Of Time.
2. Certificate Of Service
3. Exhibit A
4. Initial Appellate Brief Of Respondents-Appellants
5. Statement Of Issues On Respondents-Appellants' Appeal
6. Argument
7. Conclusion
8. Certificate of Service
9. Exhibit B
- 10 Respondents-Appellants' Designation Of Additional Matters To Be Included In The Record On Appeal.
11. Certificate Of Service
12. Exhibit C
13. The South Carolina Court of Appeals - Letter dated October 30. 2013

I am sorry that we misunderstood the letter dated October 30, 2013, which we thought totally consolidated both Appeals in this case. Also enclosed is our check for twenty five dollars to the SC Court of Appeals. Upon receipt of this letter if you have any questions please contact my office.

Watson Law Firm, P.A.



Marvin R. Watson

Enclosures:

cc: Mr. Randall Williams
Clients