

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

**RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL OF APPELLANT-RESPONDENT**

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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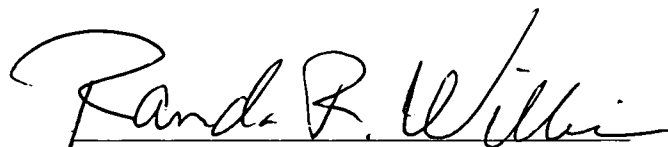
AUG 20 2014

**SC Court of Appeals**

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. Motion For Summary Judgment (Pgs. 13-16, 28-29)
  - b. Motion For Reconsideration (Pgs. 4-end)
50. Depositions
  - a. Henry Banks (Pg. 8 lns. 13-25 thru Pg. 29 lns. 1-24; Pg. 37 thru Pg. 42)
  - b. Delois Phillips (Pg. 6 thru Pg. 21 lns. 1-11)
  - c. Mary Robinson (Pg. 6 lns. 16-25 thru Pg. 16 lns. 1-22; Pg. 18 lns. 20-25 thru Pg. 19)
  - d. Frank Mattison (Pg. 4 lns. 10-25 thru Pg. 12 lns. 1-5)
  - e. Naomi Mattison (Pg.7 thru Pg.18 lns. 1-16; Pg. 23 lns. 21-25 thru Pg. 25 lns.1-20)
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.

August 18, 2014

A handwritten signature in black ink, reading "Randall R. Williams". The signature is written in a cursive style with a large initial "R" and a long horizontal stroke at the end.

Randall R. Williams  
Post Office Box 3461  
Greenwood, South Carolina 29646  
(864) 227-9156

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

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

**RESPONDENT'S CERTIFICATE OF COUNSEL OF  
APPELLANT-RESPONDENT**

The undersigned counsel hereby certifies that the **Respondent's Designation of Matter To Be Included On The Record Of Appeal of Appellant-Respondent** complies with Rule 209 (b) SCACR.

August 18, 2014



Randall R. Williams  
Post Office Box 3461  
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(864) 227-9156  
**Attorney for Appellant-Respondent**

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**SC Court of Appeals**

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

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

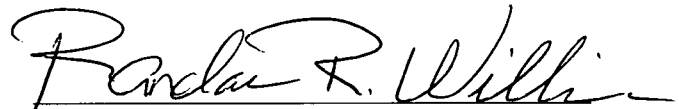
v.

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

**PROOF OF SERVICE**

I certify that I have served the **Respondent's Designation of Matter To Be Included In The Record On Appeal of Appellant-Respondent and Respondent's Certification of Counsel of Appellant-Respondent** on Henry Banks, Mary Robinson, Delois Phillips, Naomi Mattison, and Frank Mattison by U.S. Postal Service on August 18, 2014, addressed to their attorney of record, Marvin Watson at P.O. Box 799, Greenwood, South Carolina, 29648.

August 18, 2014



Randall R. Williams  
Post Office Box 3461  
Greenwood, South Carolina 29646  
(864) 227-9156  
**Attorney for Appellant-Respondent**

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**SC Court of Appeals**



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29211  
1015 SUMTER STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
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August 08, 2014

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

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

Dear Counsel:

Upon reviewing your respondent's initial brief of appellant-respondent, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The initial brief is not accompanied by a designation of matter to be included in the record on appeal.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Marvin R. Watson, Esquire  
William T. Toal, Esquire  
I.S. Leevy Johnson, Esquire

**RANDALL ROSEL WILLIAMS**  
**ATTORNEY AT LAW**



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[randall.williams@randallwilliamsllaw.com](mailto:randall.williams@randallwilliamsllaw.com)

August 18, 2014

The Honorable Jenny Kitchings  
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. Kitchings:

Enclosed please find an original **Respondent's Designation of Matter to be Included  
On The Record On Appeal of Appellant-Respondent, Certificate of Counsel and Proof of  
Service** in the above referenced matter. Please file the originals and return clocked copies in the  
enclosed envelope.

I remain,

Sincerely,

A handwritten signature in black ink that reads "Randall R. Williams" with a horizontal line extending to the right.

Randall R. Williams, Esquire  
RRW/mre

Enclosure(s)

cc: Marvin Watson, Esquire  
William T. Toal, Esquire  
I.S. Leevy Johnson, Esquire

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**SC Court of Appeals**