

# BEARD LAW OFFICES

1000 JOHNNIE DODDS BOULEVARD, SUITE 103-321

MOUNT PLEASANT, SOUTH CAROLINA 29464

T. ALEXANDER BEARD

ATTORNEY AT LAW

PHONE (843) 216-0331

FAX (843) 884-7950

E-MAIL: [abeard@beardlawoffices.com](mailto:abeard@beardlawoffices.com)

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January 27, 2015

The Honorable Daniel E. Shearouse  
Clerk, S.C. Supreme Court  
Post Office Box 11330  
Columbia, SC 29211-1330

**RECEIVED**

JAN 29 2015

Re: Supplemental Authorities  
Errol Washington v. Alice R. Stewart  
Appellate Case No. 2012-213171  
Lower Court Case No. 2009-CP-10-02846

**S.C. SUPREME COURT**

Dear Mr. Shearouse:

Petitioner supplements authorities in his Brief of Petitioner and Reply Brief of Petitioner pursuant to Rule 208 (b)(7), SCRAP. Two issues in the pending case granting summary judgment are (1) constructive knowledge/notice and actual knowledge of a bank in aiding and abetting a breach of a personal representative's fiduciary duty and (2) inferences.

The September 2014 case of *Major v. City of Hartsville*, 410 S.C. 1, 763 S.E.2d 348 (2014) addresses these questions and states:

Constructive notice is a legal inference, which substitutes for actual knowledge. (citing *Strother v. Lexington Cnty. Recreation Comm'n*, 332 S.C. 54, 504 S.E.2d 117 (1998) ("Actual notice may be shown by direct evidence or inferred from factual circumstances."))

The Honorable Daniel E. Shearouse

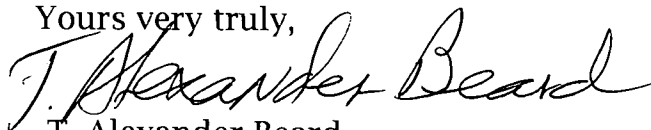
January 27, 2015

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By copy of this letter to all counsel of record, I am serving them with copies of the Supplemental Authorities.

Yours very truly,



T. Alexander Beard

cc: Edward P. Guerard, Jr., Esq.  
Trudy H. Robertson, Esq.  
Robert E. Sumner, IV, Esq.

T. Alexander Beard, Esq.  
1000 Johnnie Dodds Blvd.  
Suite 103-321  
Mt. Pleasant, SC 29464

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