

FILED

2014 MAY 29 PM 12:48

CASE #
2013 - CP - 70 - 6500

5/24/2014

Why we are ^{JULIE ARMSTRONG} ~~appealing~~ ^{CLERK OF} because MR: Jerome C Harris is not the legitimate Heir of Simeon B Pinckney now Hi BY Grandfather Ellis Jackson Pinckney AKA Because the property is still listed under Simeon's name it never probated out of His name and in to original Heir's and MR Jerome C Harris needs to show proof that He is one of the Pinckney Heir's which he is claiming to be and He never lived on that land since He was a child He grew up in Trenton New Jersey and as a true Pinckney I feel as though if He is claiming to be a Pinckney why should he walk away with our land if we all are family that why he needs to bring proof because we went all out to prove who we are as Heir's so why shouldn't the Court make Him show proof before walking away with our property, showing proof would settle the dispute so our family can move 1st like Birth Certificate, ②[#] Ellis Birth Certificate and Date on it prove who His grand father Real Father like Census record and bring some kind of proof or documents and His mother being Real Pinckney of Simeon B Pinckney grand daughter

EXHIBIT

1

CASE #

2013-CP-10-0560

Because the true pinckney Heins just
wants to know the truth the whole truth
nothing but the truth and we also want
to be separated from the Harris and the
Scott, and the Brisbane and the Wilders
and the Pirolean, because the family have
had enough of the Buck and forth with
people who is claiming to Simeon pinckney
Heins and their not so the Judge can
Decided Rightfully who the Heins are
Be some of our family was left in the
Dark about what way going on in the
family I would appreciate very much if
you could look in for the people let
Mr Harris bring the true to the court

Thank you very much

Sincerely

Mr: Gordon L. Ladson / York La
and family

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
CASE NUMBER: 2013-CP-10-6560

JEROME C. HARRIS,)
)
Plaintiff,)
)
vs.)

Judy Pinckney Singleton, Gordon Ladson,)
Charlene Wilson, Andrew Lee, Dorothy Pinckney,)
Priscilla Johnson, Sandra Pinckney Rahim,)
Anthony Pinckney, Alexis Lee, Timothy Lee, and)
Ronald Lee,)
The Estate of Eloise Pinckney Harris, John Doe,)
Jane Doe, Richard Roe, and Mary Roe, who are)
fictitious names representing all unknown persons)
and the heirs at law or devisees of the following)
deceased persons known as Simeon B. Pinckney,)
Isabella Pinckney, Alex Pinckney, Mary Pinckney,)
Samuel James Pinckney, Rebecca Riley Pinckney,)
James H. Pinckney, William Brown, Sarah)
Pinckney, Julia H. Pinckney, Laura Riley Pinckney)
Heyward, Herbert Pinckney, Ellis Pinckney,)
Jannie Gathers, Robert Seabrook, Annie Haley)
Pinckney, Lillian Pinckney Seabrook, Simeon B.)
Pinckney, Jr., Matthew G. Pinckney, Mary Riley,)
John Riley, Richard Riley, Daniel McLeod,)
Isadora A. Pinckney, Hattie Pinckney (wife of Ellis)
Pinckney), Josiah Pinckney, Annie Pinckney, Julius)
Pinckney, Sr., Eloise Pinckney Harris, Jerome)
Harris, Sr., Dorothy Lee, Josiah W. Pinckney,)
Beatrice Pinckney, Julius Pinckney, Jr. a/k/a Julia)
Pinckney, Hattie Pinckney (daughter of Josiah Pinckney),)
Elizabeth Lee, John Lee and all other persons known)
or unknown, claiming any right, title, estate,)
interest, or lien upon the real estate tracts described)
in the Complaint herein,)

Defendants.)

SUPPLEMENTAL PROCEEDING

FILED
2014 DEC 22 PM 12:55
JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

1. Comes now the Plaintiff, by and through undersigned counsel, complaining of the Defendants, alleges and says unto this Honorable Court the following:

2. That this action was initially brought by the Plaintiff on November 5, 2013.

3. That the subject matter of this action was to clear the title of the property

described as follows:

ALL that lot, piece or parcel of land, lying and being situated on James Island, South Carolina, with the improvements thereon and containing ten (10) acres more or less on the South side of Fort Johnson Road, James Island, Charleston County, South Carolina.

BEING the same premises conveyed to Isadora A. Pinckney and Eloise Pinckney Harris, by Will of Ellis Pinckney, and filed in the Probate Court of Charleston County in Book 76-415 on June 17, 1976.

FURTHER being the same premises conveyed to Eloise Pinckney Harris by Will of Isadora A. Pinckney and filed in the Probate Court of Charleston County in Book 80-580.

T.M.S. #454-03-00-001

also

ALL that piece and parcel of land, lying and being situated on James Island, South Carolina, beginning at a point on the South side of Fort Johnson Road, thence in an easterly direction for 25' to a point, thence in a southerly direction for 378.16' to a point, thence in a southwesterly direction for 128.25' to a point, thence in an westerly direction for 86.01' to a point, thence in a northerly direction for 153.53' to a point, thence in an easterly direction for 120' to a point, thence in a northerly direction for 300' to a point,

Said property bound on the East by the lands of Judy Chadwick Pinckney and Charlotte B. Flint, on the South by marsh land and on the West by the lands of the residual Estate of Eloise E. Harris and on the North by Fort Johnson Road.

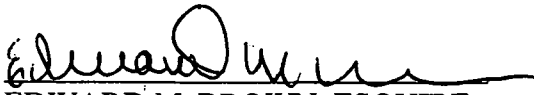
Said property further described as set out on a plat recorded in Plat Book 00, Page 553 in the Charleston County R.M.C. Office on October 13, 2000; said property constituting .6794 acres and designated as Lot A on said plat.

Being the same property conveyed to the Plaintiff, Jerome C. Harris by deed of Distribution dated November 8, 2011 and recorded in the RMC Office Book 0219, Page 408.

4. That in the original action, none of the Defendants answered except for Gordon Ladson.
5. That all of those Defendants were deemed in default by way of Court Order issued on February 6, 2014, said Order executed by the Honorable Stephanie P. McDonald.
6. That the Plaintiff filed a Motion for Summary Judgment and said Motion was heard before this Court on April 17, 2014.
7. That this Court ruled that the Plaintiff was entitled to summary judgment as a matter of law.
8. That that Final Order and Decree was filed with the Clerk of Court of Common Pleas on May 9, 2014.
9. That subsequent thereto, on May 29, the Defendant, Gordon Ladson, filed a document, in artfully drawn, with the Clerk of Court for Charleston County.
10. That Plaintiff is informed and believes that the crux of this document cannot be an appeal of this Court's Final Order in this matter executed May 8, 2014.
11. That no Notice of Appeal was filed with the South Carolina Supreme Court pursuant to Rule 201 et seq. of the South Carolina Rules of Court.
12. That more than thirty (30) days has elapsed since the issuing of this Court Order dated May 8, 2014.
13. That the filing of a document, see **Exhibit 1** attached hereto, that stated in part "*... we are appealing ...*" with the Clerk of Court of Common Pleas for Charleston County, does not constitute a Notice of Appeal in accordance with the South Carolina Rules of Appellate Procedure.

WHEREFORE, Plaintiff prays that this document be stricken or in the alternative, that the Court issue an Order mandating that the Defendant, Gordon Ladson, appeal was not timely filed with the South Carolina Supreme Court.

And for such other relief as this Court may deem just, equitable and proper.

BY: 
EDWARD M. BROWN, ESQUIRE
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Charleston, South Carolina

Dated: December 19, 2014