



## SUMPTER LAW OFFICE

ZIPPORAH SUMPTER  
ATTORNEY AT LAW

March 25, 2015

South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

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MAR 26 2015

**SC Court of Appeals**

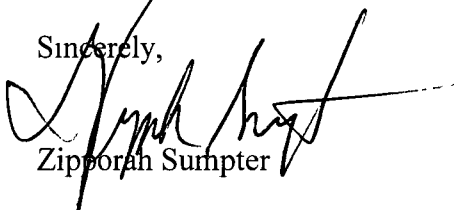
**RE: In the Matter of Annie Mae McDonald  
Appellate Case No. 2015-000527**

Dear Madam:

Upon advice from your office this letter is in response to the March 17, 2015, letter I received from this Court regarding the Notice of Appeal filed by Valarie A. Webster and Charles E. Webster, Jr. hereinafter the Appellants. I represented the Appellant's in the lower court. Sometime within the last few weeks the Appellant's filed with this Court a Notice of Appeal. I was unaware that such notice was being filed, as they did not consult with me prior to doing so. I did not learn of the filing until I received your March 17, 2015 letter.

I am writing this letter because I have a Motion to Reconsider pending before the lower court. I filed this Motion on March 2, 2015 (see attached Motion). I am seeking guidance from this Court on exactly how I should proceed. Do I proceed with the Motion to Reconsider or not. My handling of the appeal is not certain at this point but I am of the opinion that I should make the Court aware of the status of what is happening at the lower level. Your guidance in this matter is greatly appreciated. Thank you.

Sincerely,



Zipporah Sumpster

cc: Valarie A. Webster & Charles E. Webster, Jr.  
Lawrence Keitt, Esquire  
The Honorable James B. Jackson Jr.

Enclosure

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF ORANGEBURG )  
 )  
 FRANKLIN D THOMAS )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 VALARIE WEBSTER and CHARLES )  
 WEBSTER, JR. )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 FIRST JUDICIAL CIRCUIT  
 CASE NO <sup>2014</sup>~~2013~~-CP-38-~~012~~596  
 MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET

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**SC Court of Appeals**

Plaintiff's Attorney. Zipporah Sumpter, Bar No 12855 Address P.O. Box 732, Orangeburg, SC 29116 Phone: (803) 536-1895 Fax _____ E-mail _____ Other: _____	Defendant's Attorney Lawrence Keitt, Bar No _____ Address P.O. Box 811, Orangeburg, SC 29116 Phone: (803) 531-2379 Fax _____ E-mail _____ Other: _____
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MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)  
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)  
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

**SECTION I: Hearing Information**

Nature of Motion \_\_\_\_\_  
 Estimated Time Needed \_\_\_\_\_ Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**

Written motion attached  
 Form Motion/Order  
 I hereby move for relief or action by the court as set forth in the attached proposed order.

Signature of Attorney for  Plaintiff /  Defendant \_\_\_\_\_ Date submitted 3/2/15

FILED FOR RECALL  
 WINNIE A. STEWART  
 CLERK OF COURT  
 ORANGEBURG, SC  
 2015 MAR -2 PM 4:03

**SECTION III: Motion Fee**

PAID - AMOUNT. \$ 25.00  
 EXEMPT (check reason)

Rule to Show Cause in Child or Spousal Support  
 Domestic Abuse or Abuse and Neglect  
 Indigent Status  State Agency v Indigent Party  
 Sexually Violent Predator Act  Post-Conviction Relief  
 Motion for Stay in Bankruptcy  
 Motion for Publication  Motion for Execution (Rule 69, SCRPC)  
 Proposed order submitted at request of the court; or,  
 reduced to writing from motion made in open court per judge's instructions  
 Name of Court Reporter: \_\_\_\_\_  
 Other \_\_\_\_\_

**JUDGE'S SECTION**

Motion Fee to be paid upon filing of the attached order  
 Other.

JUDGE CODE \_\_\_\_\_  
 Date: \_\_\_\_\_

**CLERK'S VERIFICATION**

Collected by: \_\_\_\_\_ Date Filed \_\_\_\_\_  
 MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_

STATE OF SOUTH CAROLINA )

COUNTY OF ORANGEBURG )

FRANKLIN D. THOMAS )

Plaintiff, )

vs. )

VALARIE WEBSTER, and )  
CHARLES WEBSTER, JR. )  
Defendant. )

IN THE MASTER IN  
EQUITY COURT  
FOR THE FIRST  
JUDICIAL COURT

Docket No. <sup>2014 CP 596</sup> 2013-ES-38-0421

DEFENDANTS'  
MOTION FOR  
RECONSIDERATION

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MAR 26 2015  
**SC Court of Appeals**

FILED FOR RECORDED  
MINNIFAN CLARK  
CLERK OF COURT  
ORANGEBURG CO. SC

2015 MAR -2 PM 4:08

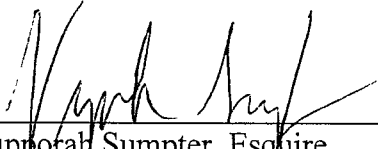
Now comes Valarie Webster and Charles Webster, Jr., Defendants in the above captioned case, through their attorney Zipporah Sumpter, requesting that this court reconsider its February 11, 2015 Order. This motion is made pursuant to South Carolina Civil Rules of Procedure 59(e) and is based on the following:

**1. THE LANGUAGE OF PARAGRAPH 2, PAGE 4, OF THE COURT'S ORDER FAVORS THE PLAINTIFF AND IS NOT NEUTRAL IN TONE.**

The language of paragraph 2, page 4 of the Court's Order is misleading and favors the Plaintiff over the Defendants. The language fails to be reflective of all testimony presented in this particular area. The Defendants' submit that the same finding in paragraph 2, page 4, could be achieved using neutral language which is subjective to neither party. Defendants' submit the following language for the Court's consideration:

"Based upon testimony presented at trial, this Court finds that when the home in New York was refinanced Plaintiff's income was used to secure the refinancing. This Court further finds that Plaintiff's income was subsequently used to pay the mortgage on the New York home."

Wherefore, your Defendants pray that this court reconsider its February 11, 2015 decision based upon the aforementioned suggested change.



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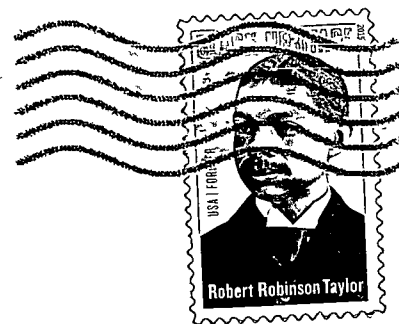
Zipporah Sumpter, Esquire  
Attorney for Defendants  
P O. Box 732  
Orangeburg, SC 29116

Orangeburg, South Carolina  
March 2, 2015

SUMPTER LAW OFFICE  
P.O. Box 732  
Orangeburg, South Carolina 29116

COLUMBIA SC 290

25 MAR 2015 1PM 4 IL



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