

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

MAY 21 2015

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

Case No.: 2013-CP-10-6560  
Appellate Case No.: 2015-000586

Jerome Harris ..... Respondent,

v.

Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, 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 person 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,.....Appellants

RETURN TO RESPONDENT'S MOTION TO DISMISS APPEAL

The Appellant responding to the Motion of Respondent's to dismiss the Appellant's appeal, responds as follows:

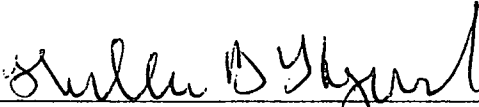
1. The Appellant filed a Notice of Appeal with the South Carolina Court of Appeals on April 3, 2015 along with the required filing fee, certificate of service and a copy of the letter requesting transcripts. The receipt of this correspondence was confirmed in a letter from the Court dated March 20, 2015 and included an assigned appellant case number. A letter of correction from the Court of Appeals, dated March 23, 2015, was received by the Appellant. (**Exhibit 1**)
2. The letter of correction stated that Appellant's correspondence filing did not contain the Notice of Appeal and that the Appellant was filing an Amended Notice of Appeal. The Court also stated that if an Amended Notice of Appeal was served on the Respondent then the Amended Notice of Appeal must be filed with the Court. The Court indicated that a motion to file the Notice of Appeal out of time was required because none had been received from the Appellant.
3. A second letter of correction, dated the same day, March 23, 2015, indicated that the letter ordering the transcript identified judge Nicolson as the presiding judge in the matter when then proof of service and the Order shows that this matter was decided by Judge Scarborough.
4. Both letters of correction gave Appellant ten (10) days to correct the deficiency. Appellant sent the Court a copy of the cover letter and enclosures filing the Notice of Appeal, along with filing fee, certificate of service and a copy of the letter requesting transcripts, dated April 3, 2015, which was received by the Court on April 21, 2015. (**Exhibit 2**)
5. Appellant filed the Amended Notice of Appeal on February 23, 2015 after serving Respondent with the Notice of Appeal and the Amended Notice of Appeal via

United States Mail and by FAX on February 23, 2015 and February 24, 2015 respectively. (Emphasis added) (**Exhibit 3A and 3B**)

6. The correspondence dated April 3, 2015 filed with the Court the requested corrections per the corrective letter concerning the lack of a Notice of Appeal proving proof the Appellant had served Respondent with both the Notice of Appeal and the Amended Notice of Appeal in a timely manner. (**Exhibit 2**)
7. The Appellant requested the transcripts the hearing, upon which the Order being appealed is based from the court reporter who transcribed the January 16, 2015 hearing. The court reporter was Christine A. Smith, the court reporter for Judge Scarborough. (**Exhibit 4**)
8. Appellant believes that he has perfected the filing of the Notice of Appeal and the Amended Notice of Appeal and corrected the required deficiencies as noted by the Court's prior correspondence.
9. Appellant is also enclosing a Motion to file the Notice of Appeal out of time should the Court find any errors in the filing.
10. Appellant received notice of the Order being appealed on January 22, 2015 and not January 22, 2013 as reflected in the Notice of Appeal and the Amended Notice of Appeal. Through a Sriver's error it indicates that the Order was received by the Appellant before the judgment was rendered.
11. Appellant has served a copy of a Second Amended Notice of Appeal upon respondent and filed same with the Court of Appeals to properly reflect the date the order was received. (**Exhibit 5**)
12. Appellant asks that the appeal be allowed to go forward and that any deficiencies

in the filing notices have been corrected.

May 4, 2015

  
\_\_\_\_\_  
Willie B. Heyward  
27 Gamecock Ave., Suite 200  
Charleston, SC 29407  
(843) 225-8754  
Attorney for Appellants

Edward M. Brown, Esquire  
PO Box 20261  
Charleston, SC 29413  
Attorney for Respondent



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1015 SUMTER STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

March 23, 2015

Mr. Willie Bruce Heyward, Esquire  
27 Gamecock Ave., Ste. 200  
Charleston SC 29407

Re: Jerome Harris v. Judy Pinckney Singleton  
Appellate Case No. 2015-000586

Dear Counsel:

Upon reviewing your correspondence received March 9, 2015, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and must be corrected within ten (10) days of the date of this letter or the appeal will be dismissed:

- The correspondence received March 9, 2015, does not include the notice of appeal.
- The signature block on your cover letter shows that you represent Ernest McKnight, a party that is not included in the caption used on the proof of service.
- The proof of service received on March 9, 2015, indicates that you are serving and filing an amended notice of appeal. However, this Court has not received a notice of appeal from you. A motion to allow the late filing of the notice of appeal will have to be made.
- If you have served and filed an amended notice of appeal on the respondent, then you must file a copy of the amended notice with this Court.

EXHIBIT  
1

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Edward McKinley Brown, Esquire

**Heirs Property  
Law Center, LLC**

27 Gamecock Ave., Suite 200  
Charleston, SC 29407

April 3, 2015

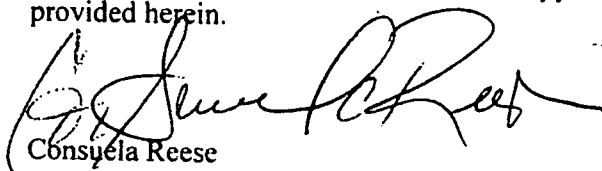
Court of Appeals  
1015 Sumter St.  
P. O. Box 11629  
Columbia, S.C. 29211

**Re: Jerome Harris vs. Judy Pinckney Singleton, et al.**  
**Case No.: 2013-CP-10-6560**

Dear Sir/Madam:

Enclosed please find a copy of the Notice of Appeal, Certificate of Service and request for transcript in the above referenced matter. Also enclosed is the filing fee in the amount of \$100.00 and a copy of the order(s) being challenged in this Appeal.

Please file same and return the clocked copy to me in the self-addressed, stamped envelope provided herein.

  
Consuela Reese  
Legal Assist to  
Willie B. Heyward  
Attorney for Appellant, Gordon Ladson

Enclosures

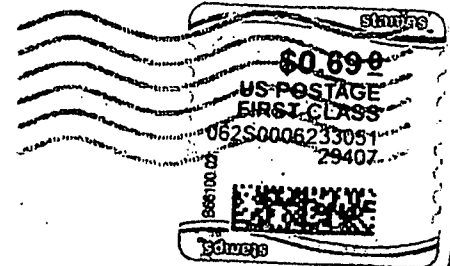
cc: Edward M. Brown, Esq.  
PO Box 20261  
Charleston, SC 29403

**RECEIVED**  
APR 21 2015  
SC Court of Appeals

EXHIBIT 2

The Heirs Property Law Center, LLC  
27 Gamecock Avenue  
Suite 200  
Charleston, SC 29407

CHARLESTON SC 294  
17 APR 2015 PM 1 L



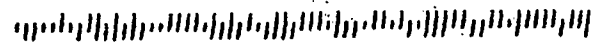
**RECEIVED**

APR 21 2015

SC Court of Appeals

Court of Appeals  
1015 Sumter St.  
PO Box 11629  
Columbia, SC 29211

29211+1629



STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )

IN THE COURT OF COMMONS )  
 )  
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 Jonson, Sandra Pinckney )  
Rahim, Anthony Pinckney, Alexis Lee, Timothy )  
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 person 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. )  
 )

**RECEIVED**

APR 21 2015

**SC Court of Appeals**

**CERTIFICATE OF SERVICE**

BY \_\_\_\_\_

JULIE J. ARMSTRONG  
CLERK OF COURT

2015 FEB 24 PM 2:48

**FILED**

The undersigned hereby certifies that she is the Legal Assistant for Attorney Willie B.

Heyward, Heirs Property Law Center, LLC for the above-named Plaintiffs and that she is a  
person of such age and discretion as to be competent to serve papers.

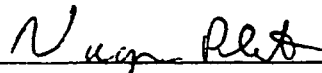
That on February 23, 2015, she served a copy of the following document(s) in the above-entitled case by faxing and placing said copy in a post-paid envelope addressed to the person hereinafter named, at the place, address and fax number stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail in Charleston, South Carolina.

**DOCUMENTS:**

**NOTICE OF APPEAL  
CERTIFICATE OF SERVICE**

**ADDRESSEE(s)**

Edward M. Brown, Esq.  
P.O. Box 20261  
Charleston, SC 29403



---

Virginia Plitnik  
Office Assistant  
Heirs Property Law Center, LLC

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

Case No.: 2013-CP-10-6560

FILED  
2015 FEB 24 PM 2:48  
JULIE J. ARMSTRONG  
CLERK OF COURT

Jerome Harris

Respondent,

v.

Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, 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 person 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,

Appellants

NOTICE OF APPEAL

RECEIVED

APR 21 2015

SC Court of Appeals

Gordon Ladson appeals the order of the Mikell R. Scarborough, Master in Equity for Charleston County dated January 16, 2015 Appellant received written notice of entry of this order on January 22, 2013.

**Heirs Property  
Law Center, LLC**

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27 Gamecock Ave., Suite 200  
Charleston, SC 29407

---

February 23, 2015

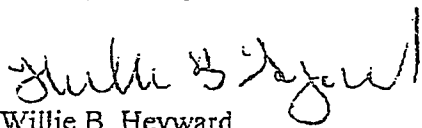
Clerk of Court / Common Pleas  
County of Charleston  
100 Broad Street  
Charleston, S.C. 29401

**Re: Jerome Harris vs. Judy Pinckney, et. al.  
Case No.: 2013-CP-10-6560**

Dear Sir/Madam:

Enclosed please find the original and a copy of the Notice of Appeal in the above-referenced case. Please file same and return the clocked copy to me in the self-addressed, stamped envelope provided herein.

Thank you for your kind attention to this matter.

  
Willie B. Heyward  
Attorney

Enclosure as stated

cc: Attorney Edward M. Brown Via FAX (843) 559-9226 and US Mail  
P.O. Box 20261  
Charleston, SC 29413

**EXHIBIT 3A**

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

---

Case No.: 2013-CP-10-6560

---

Jerome Harris

Respondent,

v.

Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, 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 person 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,

Appellants

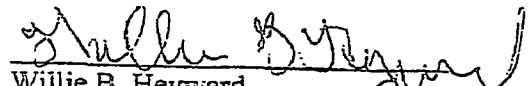
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NOTICE OF APPEAL

---

Gordon Ladson appeals the order of the Mikell R. Scarborough, Master in Equity for Charleston County dated January 16, 2015 Appellant received written notice of entry of this order on Monday, January 22, 2013.

February 23, 2015

  
Willie B. Heyward  
27 Gamecock Ave., Ste. 200  
Charleston, SC 29407  
(843) 225-8754  
Attorney for Appellant, Gordon Ladson

Other Counsel of Record:  
Edward M. Brown  
PO Box 20261  
Charleston, SC 29413

STATE OF SOUT CAROLINA )  
 )  
COUNTY OF CHARLESTON )

IN THE COURT OF COMMON S )  
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 Jonson, Sandra Pinckney )  
Rahim, Anthony Pinckney, Alexis Lee, Timothy )  
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 person 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, )  
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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, )

CERTIFICATE OF SERVICE

Defendants. )  
 )  
 )

The undersigned hereby certifies that she is the Legal Assistant for Attorney Willie B. Heyward, Heirs Property Law Center, LLC for the above-named Plaintiffs and that she is a person of such age and discretion as to be competent to serve papers.


That on February 23, 2015, she served a copy of the following document(s) in the above-entitled case by placing said copy in a post-paid envelope addressed to the person hereinafter named, at the place, address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail in Charleston, South Carolina.

DOCUMENTS:

NOTICE OF APPEAL  
CERTIFICATE OF SERVICE

ADDRESSEE(s)

Edward M. Brown, Esq.  
146 Spring Street  
Charleston, SC 29403

  
\_\_\_\_\_  
VIRGINIA PLITNIK  
Legal Assistant  
Heirs Property Law Center LLC

**THE HEIRS PROPERTY LAW CENTER, LLC**  
27 Gamecock Ave., Suite 200  
Charleston, South Carolina 29407  
Telephone (843) 225-8754  
Fax (843) 225-8765

**FAX COVER SHEET**

To: EDWARD BROWN

From: HEIRS PROPERTY LAW CENTER, LLC  
ATTORNEY WILLIE B. HEYWARD, ESQ.

YOUR FAX NO: 843-559-9226  
YOUR PHONE NO:

NO. OF PAGES: 4 + COVER

Re: APPEAL FROM CHARLESTON COUNTY  
JEROME HARRIS

OUR FAX NO.: (843) 225-8765

OUR PHONE NO: (843)-225-8754

REPLY TO: Consuela Reese

DATE

TIME:

**THANK YOU!**

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS ATTORNEY/CLIENT PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE.

EXHIBIT 3B

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

---

Case No.: 2013-CP-10-6560

---

Jerome Harris ..... Respondent,

v.

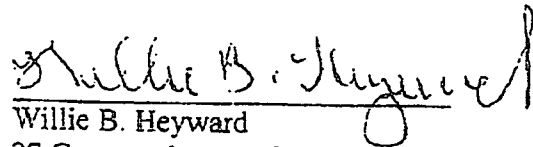
Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, Sandra Pinckney Rahim, Anthony Pinckney, Alexis Lee, Timothy Lee, and Ronald Lee, The Estate of Eloise Pinckney Harris, John Doe, Jane Doe, Richard Roe, and Mary Roe, who are fictitious names representing all unknown persons and the heirs at law or devisees of the following Deceased person 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 ..... Appellants

---

AMENDED NOTICE OF APPEAL

---

Gordon Ladson appeals the order of the Mikell R. Scarborough, Master in Equity for Charleston County dated January 16, 2015 Appellant received written notice of entry of this order on Thursday, January 22,2013.



Willie B. Heyward  
27 Gamecock Ave., Ste. 200  
Charleston, SC 29407  
(843) 225-8754  
Attorney for Appellant, Ernest McKnight

Other Counsel of Record:  
Edward M. Brown  
PO Box 20261  
Charleston, SC 29413

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

Case No.: 2013-CP-10-6560

Jerome Harris ..... Respondent.

v.

Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, 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 person 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, .....Appellants

PROOF OF SERVICE

The undersigned hereby certifies that she is the Legal Assistant for Attorney Willie B. Heyward, Heirs Property Law Center, LLC for the above-named Plaintiffs and that she is a person of such age and discretion as to be competent to serve papers.

That on February 24, 2015, she served a copy of the following document(s) in the above-entitled case by faxing and placing said copy in a post-paid envelope addressed to the person hereinafter named, at the place, address and fax number stated below, which is the last known

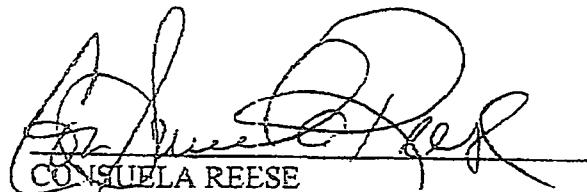
address, and by depositing said envelope and contents in the United States Mail in Charleston,  
South Carolina.

DOCUMENTS:

AMENDED NOTICE OF APPEAL  
CERTIFICATE OF SERVICE

ADDRESSEE(s):

Edward M. Brown  
146 Spring Street  
Charleston, SC 29403  
Fax: 843-559-9226



CONSUELA REESE  
Legal Assistant  
Heirs Property Law Center

**Heirs Property  
Law Center, LLC**

27 Gamecock Ave., Suite 200  
Charleston, SC 29407

March 6, 2015

Christine Smith  
Court Reporter  
Master-in-Equity  
100 Broad St., Ste 201  
Charleston, SC 29401

**Re: Jerome Harris vs. Gordon Ladson  
Case No.: 2013-CP-10-6560**

Dear: Ms. Singletary:

On January 16, 2015, the above-referenced case was tried before the Honorable Mikell R. Scarborough, Master-in-Equity, Charleston County. My records indicate that you were the court reporter for this hearing.

I request that you provide me with a transcript of the proceedings. Please transcribe the entire record.

I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Thank you for your kind attention to this matter

Consuela Reese  
Legal Assistant to  
Willie B. Heyward  
Attorney for Appellant

cc: Edward M. Brown, Esq  
PO Box 20261  
Charleston, SC 29403

S.C. Court Administration  
1015 Sumter Street  
Columbia, SC 29201

EXHIBIT  
4

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

Case No.: 2013-CP-10-6560

Jerome Harris ..... Respondent,

v.


Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, 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 person 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 ..... Appellants

SECOND AMENDED NOTICE OF APPEAL

Gordon Ladson appeals the order of the Mikell R. Scarborough, Master in Equity for Charleston County dated January 16, 2015 Appellant received written notice of entry of this order on Thursday, January 22, 2015.

*Exhibit 5*

May 4, 2015

  
Willie B. Heyward  
27 Gamecock Ave., Ste. 200  
Charleston, SC 29407  
(843) 225-8754  
Attorney for Appellants

Other Counsel of Record:  
Edward M. Brown  
PO Box 20261  
Charleston, SC 29413

**Heirs Property  
Law Center, LLC**

27 Gamecock Ave., Suite 200  
Charleston, SC 29407

**RECEIVED**

MAY 21 2015

SC Court of Appeals

May 4, 2015

Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
P.O. Box 11629  
Columbia, SC 29211

**Re: Jerome Harris vs. Judy Pinckney Singleton, et al.**  
**Case No.: 2013-CP-10-6560**  
**Appellant Case No: 2015-000586**

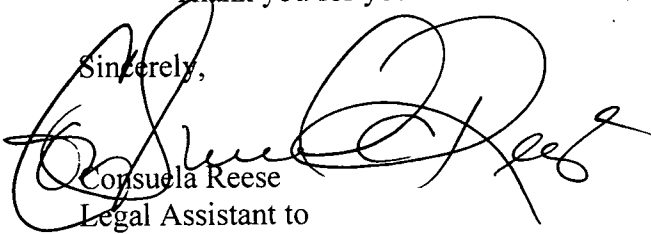
Dear Sir/Madam:

Enclosed please find the original and six copies of the **RETURN TO RESPONDENT'S MOTION TO DISMISS APPEAL** and **CERTIFICATE OF SERVICE** in the above-referenced matter. Please file same and return the clocked copy to me in the self-addressed, stamped envelope provided herein.

By copy of this letter, I am serving the Second Amended Notice of Appeal, Motion to Serve Second Amended Notice of Appeal, and Certificate of Service to Respondent's attorney, Edward M. Brown, as stated below.

Thank you for your consideration in this matter.

Sincerely,

  
Consuela Reese  
Legal Assistant to  
Willie B. Heyward  
Attorney for Gordon Ladson

Enclosures

Edward M. Brown  
PO Box 20261  
Charleston, SC 29413

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

MAY 21 2015

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Mikell R. Scarborough  
Master-in-Equity

Case No.: 2013-CP-10-6560  
Appellate Case No.: 2015-000586

Jerome Harris ..... Respondent,

v.

Judy Pinckney Singleton, Gordon Ladson, Charlene Wilson, Andrew Lee, Dorothy Pinckney, Priscilla Jonson, 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 person 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, .....Appellants

PROOF OF SERVICE

The undersigned hereby certifies that she is the Legal Assistant for Attorney Willie B. Heyward, Heirs Property Law Center, LLC for the above-named Plaintiffs and that she is a person of such age and discretion as to be competent to serve papers.

That on May 4, 2015, she served a copy of the following document(s) in the above-entitled case by faxing and placing said copy in a post-paid envelope addressed to the person hereinafter named, at the place, address and fax number stated below, which is the last known

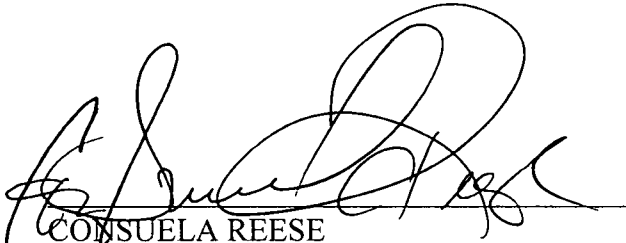
address, and by depositing said envelope and contents in the United States Mail in Charleston,  
South Carolina.

DOCUMENTS:

**RETURN TO RESPONDENT'S MOTION TO DISMISS APPEAL  
CERTIFICATE OF SERVICE**

ADDRESSEE(s):

Edward M. Brown  
146 Spring Street  
Charleston, SC 29403  
Fax: 843-559-9226

  
CONSUELA REESE  
Legal Assistant  
Heirs Property Law Center