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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

RECEIVED
MAY 21 2015
SC Court of Appeals

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 DEWISEES 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

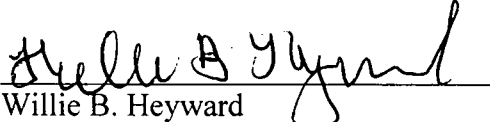
MOTION REQUESTING PERMISSION TO FILE SECOND AMENDED
NOTICE OF APPEAL

1. Appellant received notice of the Order being appealed on January 22, 2015 and not January 22, 2013 as reflected in the Notice of Appeal filed

with the Court on February 23, 2015 and the Amended Notice of Appeal filed with the Court on February 24, 2015.

2. Through a Scriver's error it indicates that the Order was received by the Appellant on January 22, 2013. This is dated before the judgment was rendered.
3. Appellant has served a copy of this Second Amended Notice of Appeal upon Respondent on May 4, 2015 as indicated in the certificate of service.
4. Appellant asserts that this Second Amended Notice of Appeal to correct an obvious scrivener's error and does not prejudice the Respondent's ability to defend this appeal.

May 4 2015


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

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

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

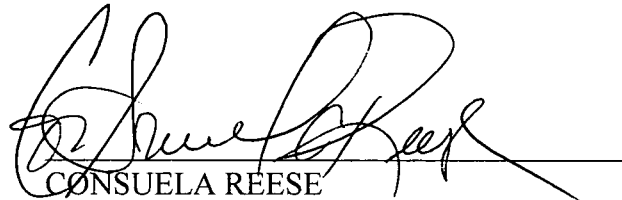
address, and by depositing said envelope and contents in the United States Mail in Charleston,
South Carolina.

DOCUMENTS:

**SECOND AMENDED NOTICE OF APPEAL
MOTION REQUESTING PERMISSION TO FILE NOTICE OF APPEAL
OUTSIDE OF THE FILING DEADLINES
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

May 4, 2015

RECEIVED
MAY 21 2015
SC Court of Appeals

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

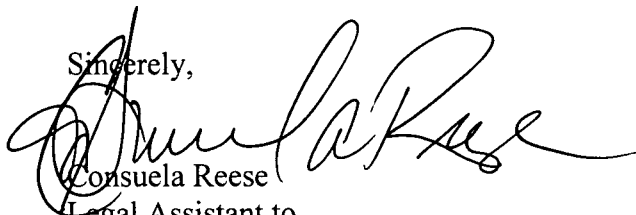
Dear Sir/Madam:

Enclosed please find the original and one copy of the Second Amended Notice of Appeal; original and six copies of Motion to Serve Second Amended Notice of Appeal, and Certificate of Service in the above-referenced matter. I am also including a \$25.00 check for the motion fee. 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 Appellants

Enclosures

Edward M. Brown
PO Box 20261
Charleston, SC 29413