

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Master in Equity

The Honorable Marvin H. Dukes III, Master in Equity

Case No. 2015-000342

Maxine Taylor, Respondent

v.

Heirs of William Taylor, Heirs of E. Washington, Heirs of Phoebe Taylor, Heirs of Albertha Goodwine, and all persons unknown designated as a class; Richard Roe, and Beaufort County, SC, a body politic, Defendants,

Of whom Heirs of William Taylor, Heirs of E. Washington, Heirs of Phoebe Taylor, and Heirs of Albertha Goodwine are the Appellants.

Stanley Taylor, Joe A. Taylor and Martha T. Brown, Respondents,

v.

Heirs of William Taylor, Heirs of E. Washington, Heirs of Phoebe Taylor, Heirs of James Joseph Taylor, Heirs of Josephine Taylor and Georgia Champion, Appellants.

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Appellant proposes the following be included in the Record on Appeal:

1. Orders, Judgments and Decrees
 - a. Final Order of Marvin H. Dukes, III, Master in Equity for Beaufort County, dated February 9, 2015 and filed February 20, 2015.

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2. Pleadings
 - a. Plaintiffs' Complaints filed June 14, 2011 and June 19, 2012.
 - b. Defendants' Answers filed November 17, 2011 and July 20, 2012.
 - c. Defendants' Amended Answers filed June 20, 2013.
3. Transcripts:
 - a. Transcript of July 29, 2013 hearing, pages 1-273
 - b. Transcript of April 8, 2014 hearing, pages 1-119
4. Exhibits

July 29, 2012 Hearing:

- a. Plaintiffs' Exhibit #6, Tax Map, 1954, revised 1965
- b. Plaintiffs' Exhibit #8, Deed, one/sixth acres from Phoebe Taylor to James Taylor
- c. Plaintiffs' Exhibit #9, Tax Deed, Deed Book 909, page 1390
- d. Plaintiffs' Exhibit #10, Tax Deed, Deed Book 1110, page 17
- e. Plaintiffs' Exhibit #11, Deed, 4 acres from Josephine Taylor to Phoebe Taylor
- f. Plaintiffs' Exhibit #15, Judd Plat
- g. Defendants' Exhibit #2, Property Card
- h. Defendants' Exhibit #3, Sketch
- i. Defendants' Exhibit #4, Depiction of Lot 9

April 8, 2014 Hearing:

- a. Defendants' Exhibit #1, Tax Map, 1954, revised 1965
- b. Defendants' Exhibit #2, Property Record Card
- c. Defendants' Exhibit #3, Property Record Card
- d. Defendants' Exhibit #4, Tax Record
- e. Defendants' Exhibit #5, Tax Map, 1954
- f. Defendants' Exhibit #6, Ariel Photograph
- g. Defendants' Exhibit #7, Ariel Photograph
- h. Defendants' Exhibit #8, Tax Map
- i. Defendants' Exhibit #9, Aerial Map with Overlay
- j. Defendants' Exhibit #10, Photograph
- k. Defendants' Exhibit #11, Photograph
- l. Defendants' Exhibit #12, Photograph
- m. Defendants' Exhibit #13, Photograph
- n. Defendants' Exhibit #14, Photograph
- o. Defendants' Exhibit #15, Photograph
- p. Defendants' Exhibit #16, Tax Sale Files

5. Other Materials and Documents
 - a. Post-Trial Brief of Plaintiffs submitted April 30, 2014.
 - b. Post-Hearing Brief of Defendants submitted May 14, 2014.

I certify that this designation contains no matter which is irrelevant to this appeal.



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July 9, 2015

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Master in Equity

The Honorable Marvin H. Dukes III, Master in Equity

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Stanley Taylor, Joe A. Taylor and Martha T. Brown, Respondents,

v.

Heirs of William Taylor, Heirs of E. Washington, Heirs of Phoebe Taylor, Heirs of James Joseph Taylor, Heirs of Josephine Taylor and Georgia Champion, Appellants.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Initial Brief of Appellants and Designation of Matter in the above-referenced case has been served upon George H. O'Kelley, Jr., Esq. at P.O. Box 1072, Beaufort, SC 29901 on this 9th day of July, 2015.



Amy K. Raffaldt, Esq.
Attorney for Appellants

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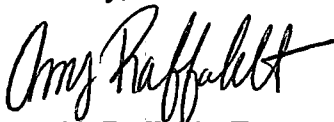
RE: Maxine Taylor v. Heirs of William Taylor, et al.
Appellate Case No.: 2015-000342

Dear Ms. Kitchings:

Please find enclosed the Initial Brief of Appellants and the Designation of Matter to be Included in the Record on Appeal together with my Certificate of Service regarding the above-referenced matter.

Thank you for your assistance in this matter. If you should need any additional information, please do not hesitate to contact me.

Sincerely,



Amy K. Raffaldt, Esq.
AKR/yt
Enclosures

cc: George H. O'Kelley, Jr., Esq.

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