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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

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SEP 14 2015

Case No. 2015-000342

SC Court of Appeals

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.

**NOTICE OF SEPARATE FILING PURSUANT TO RULE 210(f) OF THE SOUTH  
CAROLINA APPELLATE COURT RULES**

COMES NOW, the Appellants, by and through their undersigned attorney, and pursuant to Rule 210(f) of the South Carolina Appellate Court Rules, and respectfully state as follows:

1. According to Rule 210(f) of the South Carolina Appellate Court Rules,

[p]hotographs, plats and diagrams, and other paper exhibits shall be inserted in the Record on Appeal where they can reasonably be reduced or drawn to a size which permits them to be printed and

inserted in the Record on Appeal, without folding more than one time. Where they are larger, or do not reasonably lend themselves to accurate reproduction, they need not be included in the Record on Appeal, but shall be filed separately.

2. Defendants' Exhibits #3 and #4, attached hereto, were entered into evidence before the Honorable Marvin H. Dukes III, Master in Equity, during trial on July 29, 2013.
3. The above-mentioned exhibits are too large to be inserted into the Record on Appeal, submission of which is forthcoming to this Court. Furthermore, the exhibits cannot be accurately reproduced and reduced.
4. The attached exhibits were identified in the Designation of Matter filed with this Court on July 13, 2015.

Therefore, the Appellants, pursuant to Rule 210(f) of the South Carolina Appellate Court Rules, respectfully submit the attached exhibits and request that they be considered as part of the record on appeal.

  
\_\_\_\_\_  
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*Attorney for Appellants*

September 9, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Master in Equity

The Honorable Marvin H. Dukes III, Master in Equity

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Case No. 2015-000342

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v.


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**CERTIFICATE OF SERVICE**

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The undersigned attorney hereby certifies that a true copy of the Record on Appeal and Notice of Separate Filing Pursuant to Rule 210(f) of the South Carolina Appellate Court Rules 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 9<sup>th</sup> day of September, 2015.

  
\_\_\_\_\_  
Amy K. Raffaldt, Esq.  
Attorney for Appellants

# THE MACE FIRM

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SEP 14 2015

SC Court of Appeals

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South Carolina Court of Appeals  
Attn: Jenny Abbott Kitchings, Clerk of Court  
P.O. Box 11629  
Columbia, SC 29211

September 9, 2015

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

Dear Ms. Kitchings:

Please find enclosed the Notice of Separate Filing Pursuant to Rule 210(f) of the South Carolina Appellate Court Rules together with my Certificate of Service certifying service of the Record on Appeal and Notice of Separate Filing on Respondents' counsel, George H. O'Kelley, Jr.

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

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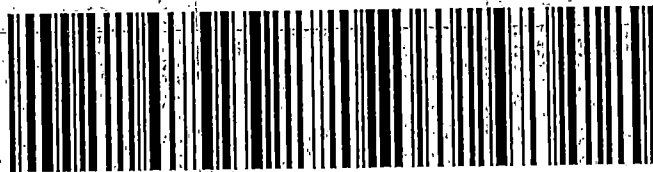
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