

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Marvin H. Dukes, III

Case No. 2014-CP-07-1732

RECEIVED

MAR 02 2016

SC Court of Appeals

Marilyn W. Bunn, a person *non compos mentis* by and through her guardian,
Denise Suddes, and Margaret Bunn Lochmandy.....Respondents,

v.

Douglas S. Delaney, as Trustee and in his individual capacity, Alan Wilson,
the South Carolina Attorney General, Sacred Heart-Griffin High School,
St. Joseph's Home, Quincy University, Notre Dame, The Lawrenceville
School, All Saints Catholic Church, and Habitat for Humanity c/o All
Saints Catholic Church.....Defendants,

Of Whom Douglas S. Delaney is the.....Appellant.

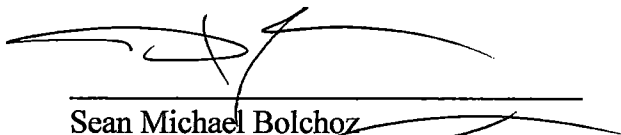
**DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Appellant proposes the following be included in the
Record on Appeal:

1. Order Denying Injunctive Relief, dated August 16, 2014
2. Affidavit of Douglas S. Delaney, dated August 4, 2014

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

February 29, 2016



Sean Michael Bolchoz
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Attorney for Appellant

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School, All Saints Catholic Church, and Habitat for Humanity c/o All
Saints Catholic Church.....Defendants,

Of Whom Douglas S. Delaney is the.....Appellant.

PROOF OF SERVICE

I certify that I have served Respondents with the Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal, by depositing a copy of same in the United States Mail, postage prepaid on February 29, 2016, addressed to their attorney of record, Robert E. Sumner, Esquire at Moore & Van Allen, PLLC, Post Office Box 22828, Charleston, South Carolina 29413.

February 29, 2016



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February 29, 2016

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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

MAR 02 2016
SC Court of Appeals

RE: In Re: John M. Bunn and Marilyn W. Bunn Charitable Remainder Trust Under Agreement Dated December 16, 1993; Marilyn W. Bunn, et al. v. Douglas S. Delaney, et al.
Case No. 2014-CP-07-1732
Appellate Case No. 2015-001813

Dear Ms. Kitchings:

Please find enclosed the original and one copy each of the Appellant's Initial Reply Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service for the above-captioned case. I would appreciate it if you would file the originals and return the clocked-copies to me via the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving copies of the aforesaid documents upon all counsel of record, pursuant to the applicable South Carolina Appellate Court rules.

If you have any questions, please do not hesitate to contact me.

With kind, personal regards, I am

Sincerely,

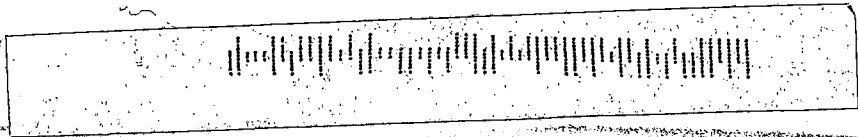
BOLCHOZ LAW FIRM, PA

Sean Michael Bolchoz
SENDER'S E-MAIL ADDRESS:
SBOLCHOZ@BOLCHOZLAW.COM

SMB/ifo
Enclosures

cc: Robert E. Sumner, Esquire (w/encl.)
Douglas S. Delaney, Esquire (via email only to doug@delaneylawfirm.com)

H:\D to G Clients\Delaney - 2716\John & Marilyn W. Bunn CRT - 11\Appeal\Correspondence - Misc\Kitchings ltr - initial reply brief - designation of matter.wpd



CHARLESTON SC 294
MON 29 FEB 2016 AM

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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