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MAR 17 2016
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court Appeals

APPEAL FROM THE CHARLESTON COUNTY
COURT OF COMMON PLEAS

J. C. Nicholson, Jr., Circuit Court Judge
Stephanie P. McDonald, Circuit Court Judge at Trial
Case No. 2012-CP-10-3421

Mamie F. Nichols,

Plaintiff-Appellant,

v.

Albert Napoleon Thompson, Jr.,
Al Thaddeus Thompson,
Titus Sherod Thompson, and Asia Rachal Thompson,

Defendants-Respondents.

MOTION TO SUBSTITUTE PARTIES

PRECIOUS FELDER
1800 Peachtree St., Suite 809
Atlanta, GA 30309
(404) 478-7207
Attorney for Appellant (Pro-Hac Vice)
State Bar Number 648264

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DECLARATION FOR MOTION TO SUBSTITUTE PARTIES

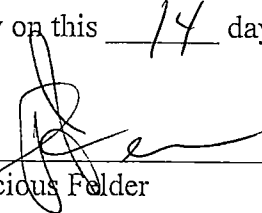
PRECIOUS FELDER declares that the following statements are true under the penalties
of perjury:

1. I am the attorney for the Appellant-Plaintiff, Mamie F. Nichols, and hereby gives notice that she has now died and her daughter Emily Nichols Felder asks to be substituted as the named appellant pursuant to Rule 265 (b).
2. Background: The complaint in this case was filed on May 25, 2012, in the Ninth Circuit Charleston County Court of Common Pleas to set aside a deed prepared by an individual who was no longer an attorney.
3. Ultimately, the plaintiff's directed verdict and judgment notwithstanding the verdict was denied by the circuit court.
4. The Appellant-Plaintiff, Mamie Nichols, timely filed this appeal on August 17, 2015.
5. Mamie Nichols died on February 4, 2016. At that time, this appeal was still pending.

6. After the death of Mamie Nichols, the Probate Court of Fulton County of the State of Georgia duly appointed on March 9, 2016 Emily Nichols Felder as the Executor of Decedent's Last Will and Testament.

Wherefore, Emily Nichols Felder, Executor of the Estate of Mamie Nichols now moves this court for an order substituting her as the appellant in this appeal in the place of Mamie Nichols, so she can continue with this appeal.

Declared to be true under the penalties of perjury on this 14 day of March, 2016.



Precious Felder
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(404) 478-7207
Attorney for Appellant (Pro Hac Vice)
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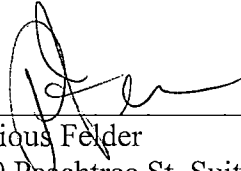
Albert Napoleon Thompson, Jr.,
Al Thaddeus Thompson,
Titus Sherod Thompson, and
Rachal Thompson,

Defendants.

CERTIFICATE OF SERVICE

I certify that I have served on this date the Motion to Substitute Parties and Declaration for Motion to Substitute Parties on Albert Napoleon Thompson, Jr., Al Thaddeus Thompson, Titus Sherod Thompson and Asia Rachal Thompson by depositing a copy of it in the United States Mail to their attorney of record, Demal I. Mattson, Jr. 804 St. Dennis Drive, Charleston, SC 29407.

March 14, 2016



Precious Felder
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Attorney for Plaintiff-Appellant