

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Lee County
Court of Common Pleas

Haigh Porter, Special Referee

—————
Case No. 2010-CP-31-195
—————

Cecil L. Josey, Jr.,	v.	Respondent,
Stanley D. Josey, Courtney Gamble, Spencer Josey, Elizabeth Ann Geddings, Cecil L. Josey, Jr. as Trustee of the Josey Family Trust,		Defendants,
Of Whom Stanley D. Josey is the		Appellant,
And of whom Courtney Gamble, Spencer Josey, Elizabeth Ann Geddings, Cecil L. Josey, Jr. as Trustee of the Josey Family Trust, are		Respondents.

**RETURN TO PETITION FOR WRIT OF SUPERSEDEAS
ON BEHALF OF RESPONDENTS COURTNEY GAMBLE,
SPENCER JOSEY, ELIZABETH ANN GEDDINGS, AND
CECIL L. JOSEY, JR., AS TRUSTEE OF THE JOSEY FAMILY TRUST**

Daniel W. Stacy, Jr.
Oxner & Stacy, P.A.
90 Wall Street, Unit B
Pawleys Island, SC 29585
(843) 235-6747 // 843-235-6650 FAX

Deborah Harrison Sheffield
Law Office of Deborah Harrison Sheffield, P.A.
117 Brook Valley Road
Columbia, South Carolina 29224
(803) 419-7837 // (803) 419-3519 FAX
**Attorneys for Respondents Courtney Gamble,
Spencer Josey, Elizabeth Ann Geddings, and Cecil
L. Josey, Jr., as Trustee of the Josey Family Trust**

INTRODUCTION

This is a partition action involving jointly owned property in Lee County, which includes a note and mortgage, three parcels of real property (Britton Farm, a fertilizer plant, and a 32-acre tract), and a vast quantify of personal property consisting of vintage automobiles along with parts and tools in the buildings/sheds on the 32 acres. The property is jointly owned by members of the family of the late C. Wofford Josey, Wofford gave the property to his sons, Stanley and Cecil, as tenants in common with equal shares. Cecil is now deceased and his 50% is held by the Josey Family Trust which holds 46% and his four children: Cecil L. Josey, Jr., Spencer Josey, Courtney Gamble, and Elizabeth Ann Geddings, with 1 % each. (Collectively referred to as "Cecil's Heirs"). Cecil L. Josey, Jr. (known and referred to as "Rainey") initiated this action by petitioning for partition.

The Special Referee ordered partition in kind and gave Stanley the note and mortgage, Britton Farm, the Fertilizer Plant, all the antique cars and a portion of the parts and tools while Cecil's Heirs received the 32 acres and the rest of the parts and tools. The Special Referee gave Stanley 180 days to remove his personal property from the 32 acres, but due to hostility between the parties and harassment by Stanley, the Special Referee limited Stanley's access and required him to give advance notice of when he would be on the 32 acres. The Order includes the specific prohibition that: "Stanley shall not enter the property except on those dates and times designated for removal of the items of personal property." [APP. 48; Amended Order, p. 6.]

Stanley filed a notice of appeal with the Court of Appeals and made a motion in the trial court for a stay pending appeal. Rainey Josey also made a motion in the trial

court to amend the order, seeking to further limit Stanley's access to the 32 acres because he had been causing trouble, but he was not even removing any of the personal property item. The Special Referee denied both motions, but in his order, he did clarify the intent of his partition order: "The only purpose for this Defendant, Stanley D. Josey, to enter upon the 32 acres was for the removal of personal property awarded to him. His access to this property awarded to the remaining properties should be limited to such removal of personal property. ... (I)ntent of the Order was for Mr. Stanley Josey to have the right to remove items of personal property as designated at specific times and the only purpose for him going on the 32 acres subject to this partition suit was for the removal of his personal property awarded him pursuant to the above referenced Orders." [APP. 77; Order, filed March 31, 2012, pp. 2-3.]

This matter is currently before the Court on Stanley's Petition for a Writ of Supersedeas seeking this Court's permission to leave his personal property in the buildings on the 32 acres and to allow him daily access to that property during the pendency of this appeal. These Respondents respectfully request that the Court deny the petition because, as the Special Referee could well see, the record shows a history and pattern of behavior by Stanley that ranges from physical assault and destruction of property to harassment and intimidation. If Stanley wants his property, he needs to get it and go, but there is no good reason that Cecil's Heirs should have to endure his constant daily presence on the 32 acres.

PROCEDURAL BACKGROUND

As required by S.C. Code Ann. § 15-61-25, Rainey gave all the Defendants notice, pursuant to, of their right of first refusal to purchase the interests in the property

in his complaint. [APP. 1; Complaint.] By his answer, Stanley asked the Court to equitably divide the personal property and the Britton Farms and the Fertilizer Plant, but he invoked his right of first refusal and gave notice that he wanted to purchase the 32 acres. [APP. 8; Answer and Counterclaim, filed October 20, 2010.] By counterclaim, Stanley also sought a declaratory and injunctive relief giving him an easement for ingress and egress to the 32 acres over an asphalt driveway on Rainey's home.¹

The Trust and Spencer, Courtney, and Elizabeth Ann (hereinafter, "the Trust Defendants"), also gave notice that they were invoking their right of first refusal to purchase the 32 acres (§18). [APP. 27; Answer & Reply, filed March 8, 2011.]

The matter was referred to the Honorable Haigh Porter, as Special Referee, who conducted a trial on the merits, and thereafter, issued his ordering partition in kind of all the property. The Special Referee declined to grant any of the non-petitioning parties the right to purchase, determined that a public sale would create chaos, and held that the assets could be divided fairly and equitably. As noted above, the Special Referee gave Stanley the note and mortgage, Britton Farm, the Fertilizer Plant, all the eight vintage automobiles and a specified portion of the parts and tools, and he gave Cecil's Heirs the 32 acres and the rest of the parts and tools. [APP. 30; Order, filed July 7, 2011.]

The Special Referee gave Stanley 180 days to remove his personal property from the 32 acres and provided specific requirements regarding the logistics of the removal, including: "Stanley shall not enter the property except on those dates and times designated for removal of the items of personal property." [APP. 35; Order, p. 6.]

¹ Stanley later filed an amended answer, counterclaim and cross-claim, asserting additional causes of action for false imprisonment, malicious prosecution, and abuse of process founded on allegations that the Plaintiff and Co-Defendants had filed warrants against him for malicious injury to property and trespass. [APP. 15.]

On July 14, 2011, Stanley served a Rule 59 motion for a new trial, and on July 19, 2011, he filed an “Addendum” to supplement his Rule 59 motion. [APP. 39, 41; Motion, Addendum] The Special Referee denied the motion, and issued an amended order that restated his findings and conclusion virtually verbatim with no substantive changes other than the consequence that Stanley’s 180-day removal period restarted. [APP. 43; Amended Order, filed August 9, 2011.]

FACTUAL BACKGROUND

Family History and Property Acquisitions

When Wofford Josey died on November 4, 1998, he left considerable properties to his sons, Cecil and Stanley, including the properties at issue in this partition action:

1. Note and Mortgage due Josey Marital Trust with outstanding principal and accumulated payments with an appraised value of \$19,376;
2. Britton Farm consisting of 30 acres of wooded upland in southeast Lee County appraised at \$38,000²;
3. A fertilizer plant consisting of 4.6 acres on Harris Street in Bishopville appraised at \$30,000³;
4. 32.98 acres appraised at \$65,960 (\$2,000 per acre) with nine (9) buildings/sheds separately appraised at \$61,000⁴;
5. Vintage Automobiles, including⁵

²[APP. 383; Plaintiff’s Ex. 1.] These valuations are not challenged by Stanley on appeal.

³[APP. 400; Plaintiff’s Ex. 2.]

⁴[APP. 406; Plaintiff’s Ex. 3.] The plant is not currently operational.

⁵ Stanley he does not challenge the valuations on appeal.

a 1922 Velie appraised at \$20,000,
a 1926 Essix appraised at \$2,500
a 1966 Ford appraised at \$1,500,
a 1924 Nash appraised at \$2,500,
a 1919 Model T. Truck appraised at \$2,500,
a 1960 MGA appraised at \$2,5000,
a 1928 Studebaker appraised at \$2,500, and
a 1922 Jewett appraised at \$3,500; and

6. Parts and Tools appraised at \$45,900.⁶ [See APP. 51; Plaintiff's Ex. 30, attached to Order.]

Cecil had given his 50% share to a trust he created ("Josey Family Trust"); his four children – Rainey, Spencer, Elizabeth Ann, and Courtney are the beneficiaries. [APP. 125; Tr. 47.] The Trust has conveyed 1% to each of the four children. [APP. 125; Tr. 47.]

The Special Referee stated that "[t]he real bone of contention is whether the 32.8 acre parcel should be partitioned, allotted or sold." [APP. 32; Order, p. 3.] The 32 acres, which is located in Lee County on Elliott Highway, abuts a parcel of 8.4 acres, which is personally owned by Rainey Josey as his residence. This parcel had been part of a larger parcel that Stanley and Cecil inherited from Wofford, but Stanley and the

⁶ Rainey and Spencer prepared the appraisal of the parts and tools. [APP. 49; Plaintiff's Ex. 28.] Stanley did not introduce any appraisals to challenge the valuations; and he does not challenge the valuations on appeal.

Trust sold it to Rainey in 2001⁷. [APP. 108-09; Tr. 29-30.] The 32 acres also abuts a tract of 3.5 acres that Wofford gave to Cecil in 1994, where Cecil raised his children and where their mother live. Cecil deeded this tract to the Josey Family Trust in 2001. [APP. 105-06, 111, 129; Tr. 27-28, 32, 51.]

As identified in the appraisal, the nine (9) buildings and sheds on the 32 acres consist of: 40 x 80 woodsided shed/enclosure with a tin roof; 26 x 41 covered shed with a tin roof; 36 x 41 enclosed with a shed; 27 x 60 workshop with concrete floor and aluminum roof; 21 x 101 car storage with 10 door metal frame; 40 x 60 workshop with steel frame; 32 x 90 enclosed with rear shed CCB/Wood; 36x 60 Hoover building; and a two-story cabin 2150+ square feet. [APP. 406; Plaintiff's Ex. 3.] In addition to the jointly-owned vintage automobiles listed above, the nine buildings contain year's worth of car parts and equipment. Rainey and Spencer compiled a list of various big items (valued at more than \$500) and grouped other items based on type and location. [APP. 49; Plaintiff's Ex. 28.] Upon visiting the property and viewing the buildings, the Special Referee reported that he was "awestruck" by the great quantity and the magnitude of any attempt to appraise them by item.⁸

There was also a family partnership, Stoney Run Farms, which Wofford had created, and while that partnership is not part of the partition action, certain facts regarding those properties and the dissolution of the partnership are relevant to Stanley's

⁷ Wofford bought the property in 1954 and built a home several years later which Stanley and Cecil called home until they were grown and gone. [APP. 214; Tr. 136.]

⁸ The parties also stored their own personal property in the buildings on the 32 acres. For example, each of these Respondents has their own vintage automobiles stored there. [See App. 50; Plaintiff's Ex. 29 – listing personal items.]

claims of unfairness. The partners were Wofford, his sons Stanley and Cecil, and his grandchildren/Cecil's four children.⁹ [APP. 102; Tr. 24.] In 2010, the Stoney Run partnership was dissolved and the assets were distributed. As part of that dissolution, Stanley received 181 acres, which abuts his home¹⁰ along with @ 1000 acres of farmland, timberland, and bottomland. [APP. 117-22; Tr. 38-43.]

Stanley claims that the 32 acres "is the base of the Josey family's farming operation." [Petition, p. 2.] However, the record will show that Wofford Josey had stopped farming long before his death, and simply rented land to others who actually farmed. Stanley avers in his affidavit that he operates a 1,500 acre farm and he needs to store his heavy farming equipment in the building and sheds, and complains that he is having to store his equipment on his own property exposed to the weather. However, according to Stanley' own trial testimony, had not worked on the farm since many years ago and he retired 13 years ago when his father Wofford died, and he has been living off the income he receives from renting the farmland. [APP. 221, 303-06; Tr. 143, 225-28.]

Family Dissension and Escalation to Physical Assault, Injury to Property and Law Enforcement Involvement

The troubles between Stanley and Cecil's heir started in 2006 over the fact that Stanley would not help with the upkeep on the jointly owned properties. [APP. 141-42; Tr. 63-64.] For the next several years, they went about getting the properties appraised and trying to divide the properties. Then in 2009, things took an ugly turn when Stanley

⁹Stanley does not have any children.

¹⁰ Wofford deeded the land to Stanley for his home on the same day he deeded the 3.5 acres to Cecil. [APP. 220; Tr.142]

and his wife trespassed into Rainey's office on his privately owned land and Stanley assaulted Rainey.¹¹ [APP. 145; Tr. 67.]

The problems continued into 2010, with Stanley turning on radios at the cabin at full volume and leaving them on day and night. Although Stanley claims that his purpose was to scare the squirrels away,¹² the noise was a big problem to Rainey and their mother because the cabin was so close to Rainey's house (90 yards) and their mother's house (60 yards). Whatever his motivation, Stanley's actions showed complete lack of respect for Cecil's family right to live in peace and quiet. At first, Rainey would unplug the radios, but Stanley would come right back and plug them in, so Rainey finally just turned the electricity to the cabin off. [APP. 154-56; Tr. 76-78.]

Another problem was the fact that Stanley started trespassing on Rainey's property to use the asphalt driveway.¹³ The paved portion of the driveway runs from the road to Rainey's carport and then becomes a little dirt road that goes over to the cabin on the 32 acres. [APP. 216; Tr. 138.] When the troubles escalated, Stanley began driving fast up and down his driveway so Rainey issued a no trespassing notice to Stanley to stay off his land and the tract owned by the Trust where their mother lives. [APP. 216; Tr. 79-80, Plaintiff's Ex. 26.]

Stanley claims that he retained an easement across that driveway when he sold the property to Rainey in 2001: "I didn't think when Rainey bought that property that

¹¹ Stanley and his wife both admitted in their trial testimony that Stanley grabbed Rainey by the collar. [APP. 299, 340-41; Tr. 221:23-25; 262-63.]

¹² [APP. 266-69; Tr. 188-191.]

¹³ Prior to the troubles, Stanley mostly had been using the north access to the buildings on a dirt road shared with their neighbor.¹³ [APP. 214-17; Tr. 136-39.]

that easement would go away. I thought once an easement, always an easement is the way I thought things worked. Just because you buy a piece of property where a man's been going up and down it for fifty (50) years, that doesn't cut him off from going in and out of it." [APP. 286-87, 325; Tr. 208:20 – 209:1; Tr. 247:1-14.]. Although Stanley asserted a counterclaim to determine his right to an easement over the driveway, he had not pursued the issue on appeal.

Because his home abuts the 32 acres, Rainey and his family suffered most from Stanley behavior. For example, even after Rainey issued the no trespass notice, Stanley would drive his truck right up to the property line at night and just shine his headlights at the house, which disturbed Rainey's children sleeping. [APP. 159-60; Tr. 81-82.] Then, in August 2010, Stanley disassembled part of the children's tree house and destroyed azaleas in Rainey's own yard, and Rainey called the police and had Stanley charged with malicious injury to personal property and trespassing. [APP. 161-62; Tr. 83-84.] At one point, Rainey recorded Stanley yelling profanity, cussing and threatening, and a Lee County Magistrate who issued a mutual restraining order.¹⁴ [APP. 183, 202-03; Tr. 105, 124-25.]

However, these Defendants were also affected by Stanley's harassment. For example, Stanley would park his boat or stack materials in the buildings purposefully to block access by the other co-owners. [APP. 164-65; Tr. 86-87.] Stanley also trespassed on property held by the Josey Family Trust.¹⁵ Their mother, who lives on Trust property,

¹⁴ A previous effort to obtain a restraining order had been denied because Rainey did not have sufficient evidence. [APP. 182, 201-02; Tr. 104, 123-24.]

¹⁵ A courtesy summons was issued to Stanley for trespassing (to hunt) in October 2010.¹⁵ [APP. 163; Tr. 85.]

testified to an incident in the summer of 2010 when Stanley had a fit of temper and was raising and shaking what appeared to be pipe; while Stanley was not trespassing, she was afraid for her safety and Rainey's family safety.¹⁶ [APP. 243-44; Tr. 165-66.] Spencer and Courtney each testified how they also have been affected. Courtney no longer uses the cabin for family outings, as she once did, because she wants to avoid the trouble. [APP. 350; Tr. 272.] Spencer has an antique automobile that he is working on, and Stanley has dismantled some of the parts and scattered them around in different buildings. [APP. 365-68; Tr. 287-290.]

The Record Clerk from the Lee County Sheriff's office testified that they had eight (8) incident reports of calls to the property in one year (4/30/10 – 4/10/11). [APP. 413, 272; Plaintiff's Ex. 4 – Incident Reports; Tr. 194.]

Continuing Post-trial Harassment by Stanley

Stanley's harassment continued after the trial. During the 180 days following entry of the order directing him to remove his personal property from the 32 acres, Stanley's attorney notified Rainey's attorney that Stanley would be on the property for days and weeks at a time: July 20-22, July 27-29, August 3-6, August 9-12, August 16-19, August 23-26, August 30-31, all of September 2011. [APP. 62; Affidavit of Rainey Josey, Ex. 2 – attorney letters.] However, Stanley removed very little if any of his property. Instead, Stanley was recorded making lewd, obscene and vulgar gestures towards the security cameras installed by Spencer. In addition, Stanley tried to claim the right to use the cabin for day and weeks at a time in the fall and winter of 2011 for his

¹⁶ Stanley admitted that he was frustrated that Rainey was taking a picture/video of him, and took a rubber hose and beat on a metal table in one of the buildings. [APP. 299; Tr. 221.]

exclusive use, even though the order only gave him access to the 32 acres for the sole purpose of removing his personal property. [APP. 75; Affidavit of Spencer Josey, dated October 10, 2011; Tr. 249.]

When the Special Referee denied Stanley's request for a stay, he made it very clear that Stanley was only allowed on the 32 acres for the sole purpose of removing his property during that 180-day period. However, Stanley's harassment did not end.

The attached affidavit of Rainey Josey shows that in November 2011, frightened Rainey's children with his shouting & cursing and the Sheriff's Department was called to the property yet again. [Ex. A; Affidavit of Rainey Josey.] Stanley has not returned to the 32 acres since November 2011.

Stanley did ask to retrieve his boat (which was never part of the joint property),¹⁷ and an arrangement was made, through the attorneys, for Rainey to pull the boat out of the shed and park it on the north access road adjacent to the asphalt driveway where Stanley retrieved it. Thereafter, Stanley has made repeated requests through counsel for access to return his boat to the 32 acres; however, Rainey has refused to allow Stanley to use the 32 acres as his personal boat storage. [Ex. A; Affidavit of Rainey Josey.]

DISCUSSION

Rule 241(a), SCACR

As a general rule, the filing of the Notice of Appeal would automatically stay the order on appeal. Rule 241(a), SCACR. However, the Special Referee's order falls within exceptions to the general rule found in Rule 241(b), namely, the division and

¹⁷ Stanley's boat had been stored at his home until this disagreement started. Then, sometime in 2010, he began parking it on the 32 acres adjacent to Rainey's house. [Ex. A; Affidavit of Rainey Josey.]

delivery of the cars and parts/tools falls with the exception in Rule 241(b)(2), and the division of the parcels of real property falls within the exception in Rule 241(b)(4). : In addition, the restriction on Stanley access to the 32 acres is in the nature of an injunction or restraining order that falls within the exception of Rule 241(b)(8).

Rule 241(c)(2) provides that when presented with a petition for a supersedeas, the Court should consider whether such an order is “necessary to preserve jurisdiction of the appeal or to prevent a contested issue from becoming moot “ In this appeal, Stanley does not challenge the Special Referee’s decision to award him Britton Farms and the Fertilizer Plant or the personal property he was awarded; rather, Stanley is challenging the award of 32 acres to Cecil’s Heirs. He wants to buy the 32 acres with the nine buildings or have it divided so that he can maintain his personal property in some, if not all, of the buildings.

At this point, the Respondents have not moved to compel Stanley to remove his property. However, they have not allowed him on the property since the 180 days expired. In this petition, Stanley is asking the Court to allow him to leave his property on the 32 acres and he is also asking for regular/daily access (30 hours per week between 7 am-7pm) to his personal property on the 32 acres during the pendency of this appeal.

These Respondents respectfully submit that the type of order that Stanley Josey is seeking is not necessary to preserve jurisdiction of the appeal or to prevent a contested issue from becoming moot. Stanley’s complaints about the he cannot afford to move and store his property and his insistence that he needs access to maintain his cars and store his farm equipment do not affect jurisdiction or threaten to moot any issue raised on

appeal. On the other hand, Stanley's past conduct proves that he should not be allowed such regular access to the 32 acres.

A. The Issues Not Preserved for Appeal

First, the Respondents would point out that Stanley has not raised any issue on appeal challenging the Special Referee's ruling and order restricting his use of the 32 acres or the timetable for removal of his property. Second, Respondents maintain that Stanley has not preserved his challenge to the unfairness of giving him part of the personal property and making him move it and store it elsewhere. The merits of this issue are fully presented in the Respondents' Initial Brief, which is submitted herewith; however, for the purposes of this Return, Respondents would ask the Court to note that Stanley did not offer any evidentiary basis for his argument about his moving and storage expenses and he did not ask the Special Referee to make any adjustment in the division to factor in his expenses.

The Court will see that Stanley's argument of "unfairness" at trial was he is entitled to, and deserves, the 32 acres, or at least half of it, because he is the sole surviving son [App. 292-93, 294, 317-18; Tr. 214:24 – 215:7; Tr.216:3-12; Tr. 239:25 – 240:11.] The Court will also see that that Stanley did not raise any issue in his Rule 59 motion about the fairness of the partition or about his moving and storage expenses. And, while Stanley did attempt to raise the issue of his expenses during his oral argument at the motion hearing, it was untimely and lacked any evidentiary basis because Stanley never proffered even an estimate of his anticipated expenses.. [APP. 443; 8.2.11 Tr. 11.]

B. Stanley Does Not Need Access to the 32 Acres.

Stanley avers his in Affidavit submitted with his Petition that he needs access to the 32 acres during the pendency of this appeal because his antique cars need preventative maintenance. Specifically, he avers that he needs to check and maintain the air pressure in the tires and polish the metal components on the cars at least weekly, and that he needs to have regular/daily access (30 hours per week between 7 am-7pm). However, Stanley's current "urgent" need to take care of his cars and the amount of time he supposed needs (30 hours a week between 7am -7pm) is rebutted by the evidence.

The evidence at trial shows that Stanley went almost a year without having access to the buildings and his antique cars. (App. 279; Tr. 201.) Since trial, Stanley has not been on the 32 acres since November 2011, and although the Special Referee issued his order denying him a stay in March 2012, he has waited for five month to file the Petition before the Court. During the post-trial time period in which Stanley had been granted 180 days of access to remove his personal property, surveillance showed that he rarely spent more than an hour. For example, in July 2011, Stanley was on the property from Wednesday 7/20 to Friday 7/22, and Wednesday 7/27 – Friday 7/29 for periods of 15 minutes, 20 minutes, 30 minutes, 45 minutes. Another example is during September 2011, when Stanley was on the property everyday from Monday 9/12 to Sunday 9/18 for periods of 40 minutes, 3 minutes, 1 hour, 15 minutes, 33 minutes, 3 minutes, 4 minutes. (App. 62; Affidavit of Rainey Josey, Ex. 2.) These examples tend to show that Stanley does not need access to the 32 acres for 30 hours a week, and the amounts of time tend to dispute the believably that Stanley was actually working on his antique cars during his

daily visits. Rather, they tend to show that Stanley was using his court-granted access just to harass the Respondents.

Stanley also complains that his boat is being damaged because Rainey will not let him return it to storage in one of the buildings. However, the evidence from Rainey Josey's affidavit establishes that Stanley historically had stored his boat at his own home, and he did not even begin storing his boat in one of the buildings on the 32 acres until the family dissension escalated in 2010.

C. Stanley's Ability to Pay his Moving and Storage Expenses

Stanley claims that moving his property will require "substantial expenditure" and that he has no ability to store the property, and he claims that "he cannot afford to move it from the only place it has ever been stored." (Petition, p. 4.) However, Stanley's claims regarding the expenses are unsubstantiated and his claim that he cannot afford to pay those expenses is contradicted in the record a trial and as supplemented with this Return.

The evidence adduced at trial shows that Stanley is a man of considerable assets. Stanley has received \$87,000 in property in this partition by the award to him of the note and mortgage, Britton Farm, and the Fertilizer Plant. In addition he has the home his father gave him, the property he received when the Stoney Run Farms family partnership was dissolved. As evidenced by the title search submitted herewith and attached as Exhibit B, the County land and tax records show that land Wofford gave Stanley in is valued for tax purposes (2011) at \$117,680. In addition, the properties he received from the Stoney Run Farms dissolution are valued (as of 2011) collectively at \$1,615,295, all of which is debt free.

Finally, Stanley's claim that he lacks the financial resources to move and store his personal property is rebutted by his own testimony at the trial that he had arranged to obtain \$3.4 million overnight when he wanted to buy Cecil's children out of Stoney Run and all the joint property. [APP. 277; Tr. 199:18-23.]

D. The History of Stanley's Disruptive and Harassing Conduct

While Stanley has claimed that he can live peaceably with the Respondents and he has promised that will "strictly abide" by any terms of access set by the Court, the evidence of record proves, as the Special Referee found it "pretty obvious" that the parties do not get along, and it is not in their best interest to own this property together or adjacent to each other. [APP. 184; Tr. 106:21-23; Tr. 304:8-12.] The undisputed evidence shows that the Sheriff's Department has been called out to Rainey's property on nine occasions and Stanley is facing criminal charges for malicious injury to property and trespassing.

The Special Referee anticipated there would be problems during Stanley's removal of his personal property and he urged the parties "to keep cool heads and remain civil." [APP. 48; Amended Order, p. 5.] However, Stanley ignored his advice, which the Respondent submit show that allowing Stanley access to the 32 acres for 30 hours a week will inevitably lead to more problems.

E. The Driveway on Rainey's Property

As described above that there are two access points to the 32 acres, an asphalt driveway across Rainey's land and a dirt Road shared with the neighbor. The Special Referee directed that Stanley was to use the dirt road when removing his personal property, and now Stanley is asking this Court to let him use Rainey's driveway to access

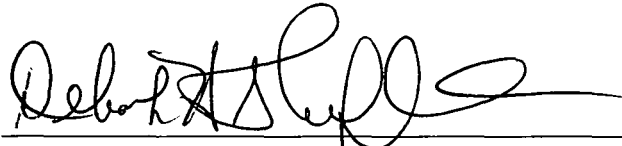
the 32 acres during the pendency of this appeal, arguing that: “There is no principled reason why Stanley should be barred from continuing such use during the pendency of this appeal.” [Petition, p. 7.] The primary legal reason that Stanley should not be given access to the driveway is because the driveway is on Rainey’s land, and Stanley did not retain any legal easement to continue to use it after he sold his ½ interest to Rainey in 2001. The other, equally important reason, is that Stanley has used that driveway to harass Rainey’s family. Further, there is no evidence that Stanley could not use the dirt road, if necessary, to access the 32 acres. While the dirt road is partially owned by a neighbor, Stanley testified that the Josey family has been using it for years and he has not offered any evidence that the neighbor has made any effort to keep him off or restrict his use of that road in recent time. [APP. 302-03; Tr. 224-25.]

CONCLUSION

WHEREFORE, based on the foregoing, the Respondents respectfully request that this Court deny the Petition for Supersedeas. In the alternative, if the Court determines that Stanley Josey should be allowed access to the 32 acres pending appeal, Respondent would request that the matter be referred back to the Special Referee to determine the specific terms and conditions of any such access.

Respectfully submitted,

Daniel W. Stacy, Jr.
Oxner & Stacy, P.A.
90 Wall Street, Unit B
Pawleys Island, SC 29585
(843) 235-6747 // 843-235-6650 FAX



Deborah Harrison Sheffield
Law Office of Deborah Harrison Sheffield, P.A.
117 Brook Valley Road
Columbia, South Carolina 29224
(803) 419-7837 // (803) 419-3519 FAX

**Attorneys for Respondents Courtney Gamble,
Spencer Josey, Elizabeth Ann Geddings , and Cecil
L. Josey, Jr., as Trustee of the Josey Family Trust**

October 1, 2012

Certificate of Service

I certify that on this 1st day of October, 2012, a copy of the foregoing **Return** of Respondents Courtney Gamble, Spencer Josey, Elizabeth Ann Geddings , and Cecil L. Josey, Jr., as Trustee of the Josey Family Trust along with the **attached exhibits** and the separate **Appendix** were served on Appellant and co-Respondent Cecil L. Josey, Jr. by depositing said copy in the U.S. Mail, with sufficient first class postage, addressed to his Counsel of Record of as listed below:

John S. Nichols
Blake A. Hewitt
Bluestein, Nichols, Thompson & Delgado, LLC
P. O. Box 7965
Columbia, SC 29202

Patrick M. Killen
28 N. Main Street
Sumter, SC 29150

S. Bryan Doby
Jennings & Jennings
P.O. Box 106
Bishopville, SC 29010



Deborah H. Sheffield

EXHIBIT A

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Cecil L. Josey, Jr.)
Respondent)
)
versus) AFFIDAVIT OF CECIL L.
) JOSEY, JR.
)
Stanley D. Josey, Courtney Gamble)
Spencer Josey, Elizabeth Ann)
Geddings, Cecil L. Josey, Jr. as)
Trustee of the Josey Family Trust,)
)
Defendants.)
)
Of whom Stanley D. Josey is the,)
)
Appellant,)
)
And Courtney Gamble, Spencer Josey,)
Elizabeth Ann Geddings, and Cecil)
L. Josey, Jr., as Trustee of the)
Josey Family Trust are,)
)
Respondents.)

PERSONALLY appeared before me, Cecil L. Josey, Jr., who being duly sworn, deposes and says: that to my knowledge, the last time Stanley Josey was present on the property adjacent to my home unsupervised was on Monday, November 7, 2011. That on November 7, 2011, my children, ages 9, 12 and 14, had the day off from school and were at our home while my wife and I were at work. I received a call at work from my 14 year old daughter who was upset and told me that she had been outside by herself when Stanley Josey parked his truck on the 32 acres

approximately 30 yards from my property and he began shouting & cursing in the direction of my home. My daughter became so frightened she locked herself in the house with her two brothers and then called me. I instructed my daughter to get the restraining order out, and I told her that I would call the police immediately. I called the Sheriff's Department and they sent out a deputy to my home on November 7, 2011, but Stanley had already left before I got home and before the Deputy arrived. (See attached incident report). Affiant further states that upon information and belief, that shortly after the incident on November 7, 2011, my attorney spoke with Stanley Josey's attorney, Blake Hewitt, about Stanley's out of control behavior; and thereafter Stanley has not been back on the 32 acres unsupervised.

Affiant would further state that his father, Cecil Josey, and his grandfather, Wofford Josey, quit farming in about 1973 and began cash renting most of the land at that time. To the best of my recollection, by 1973, Stanley had already left the farming operation and gone to work for an outside employer. When my father quit farming, he began an antique car restoration business, and a few years later Stanley came to work for my father. Stanley worked for my father until my father died in 2001.

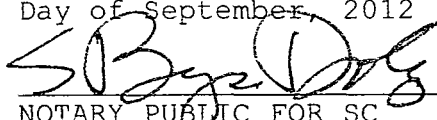
Affiant would further state that to his knowledge, Stanley Josey does not actively farm anything more than wildlife food plots for hunting and a garden. He does cash rent about 577 acres of cropland to a farmer/producer, M. T. Simpson Farms. The farm equipment, owned by Stanley which has been stored on the 32 acres is more than 30 years old and has historically been stored outside, not inside any buildings.

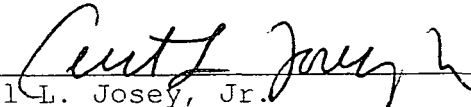
Affiant states that to the best of his knowledge, Stanley's boat was always stored at his home until this disagreement began toward the later part of 2008. Then, sometime in 2010, Stanley began parking it on the 32 acres adjacent to my home. At one point he stored it in building 7, Cecil's main shop. He then began storing his boat in building 6, the farm shop, intentionally blocking access to my personal farm equipment I had stored in this building. In the spring of 2012, Stanley asked to come get his boat. By communication between our attorneys, I agreed to pull the boat out of the shed and park it on the north access road adjacent to the driveway to my home at a specific time. I, along with another individual, moved the boat at the designated time, and Stanley picked it up a few minutes later. Stanley has, through his attorney, asked to return the boat to the 32 acre property, however, we have refused.

The current location and status of all the antique cars are just as they have been for the last few years. They are all in reasonably safe buildings. Some of Stanley's cars are stored in the same buildings with my cars, my brother's cars and my two sister's cars.

By tax records and by personal observation, Stanley has 2 storage facilities located around his home as shown on the attached aerial depiction. The building to the southwest of his home has been in place for an extended period of time. The building directly north of his home was built in 2010 and according to the building permit, was constructed as a pole storage building.

SWORN to before me this 26th
Day of September, 2012

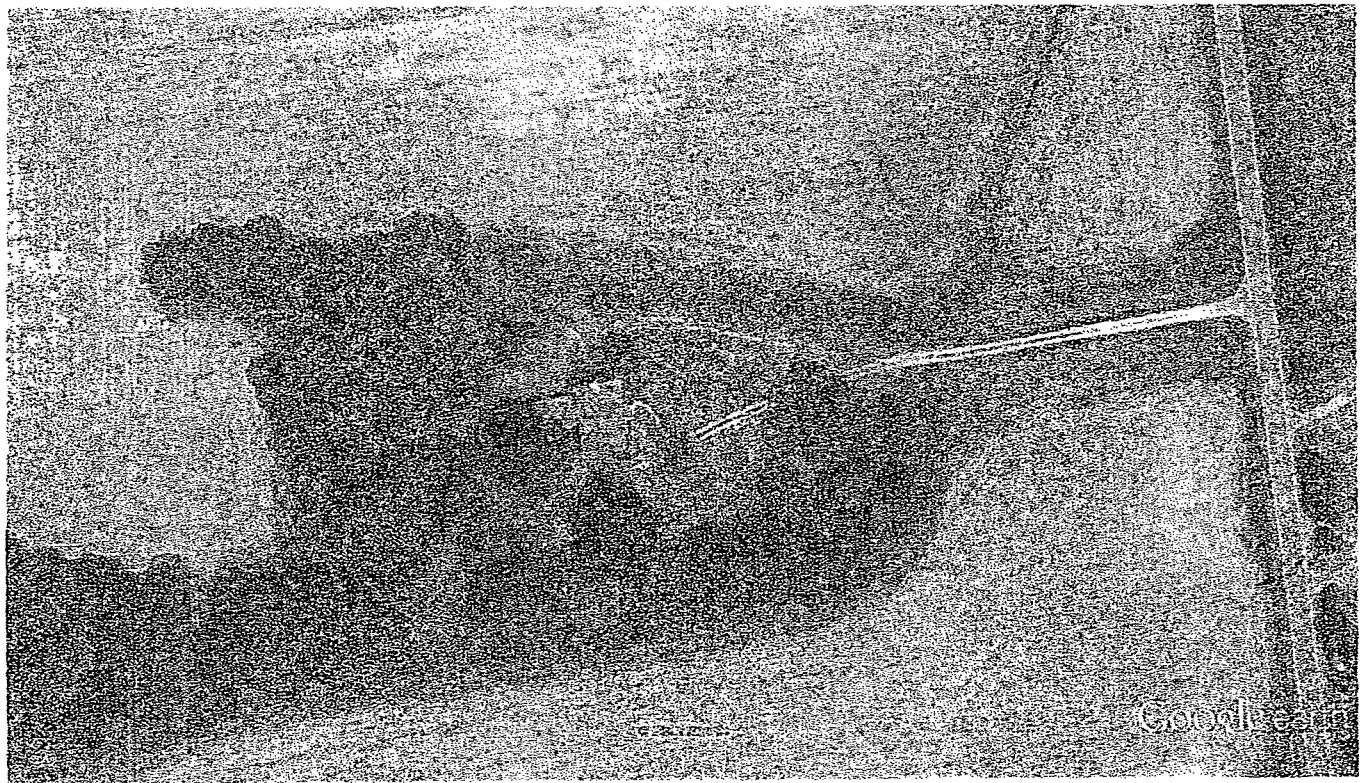
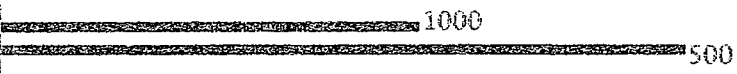

NOTARY PUBLIC FOR SC (LS)
My Commission expires 11/18/17


Cecil L. Josey, Jr.



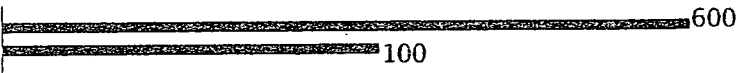
Google earth

feet
meters



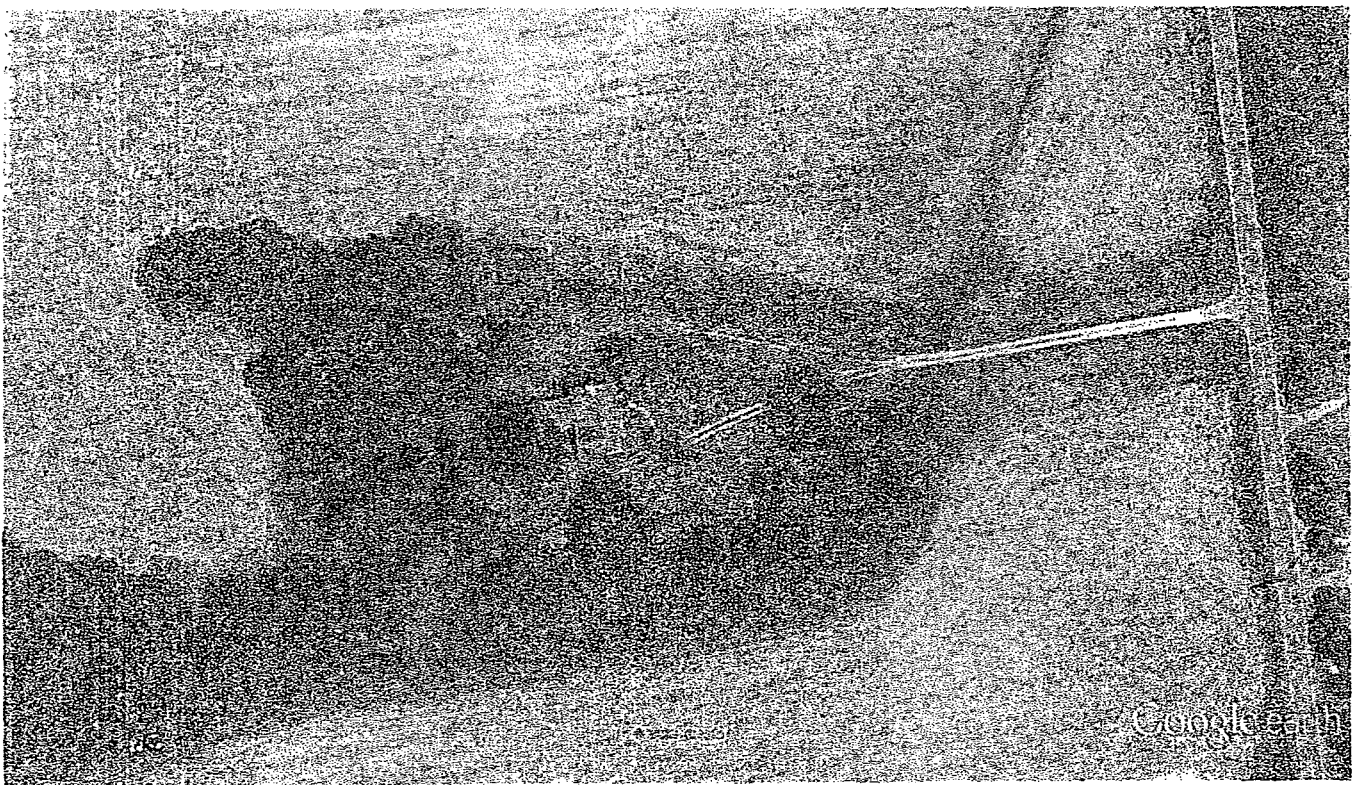
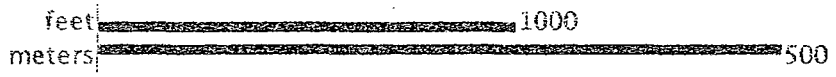
Google earth

feet
meters





Google earth

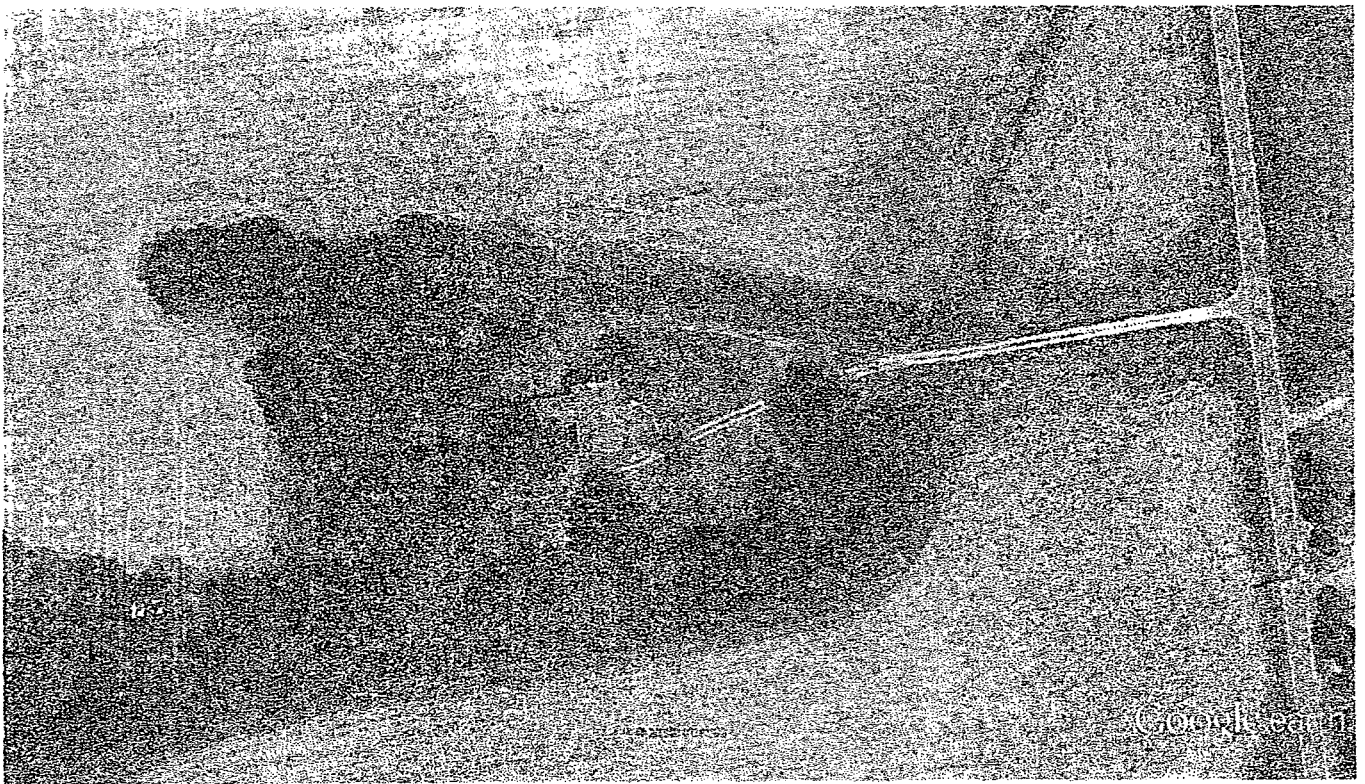
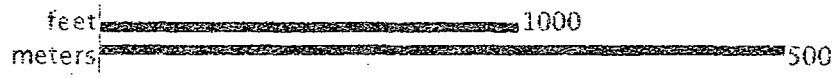


Google earth





Google earth

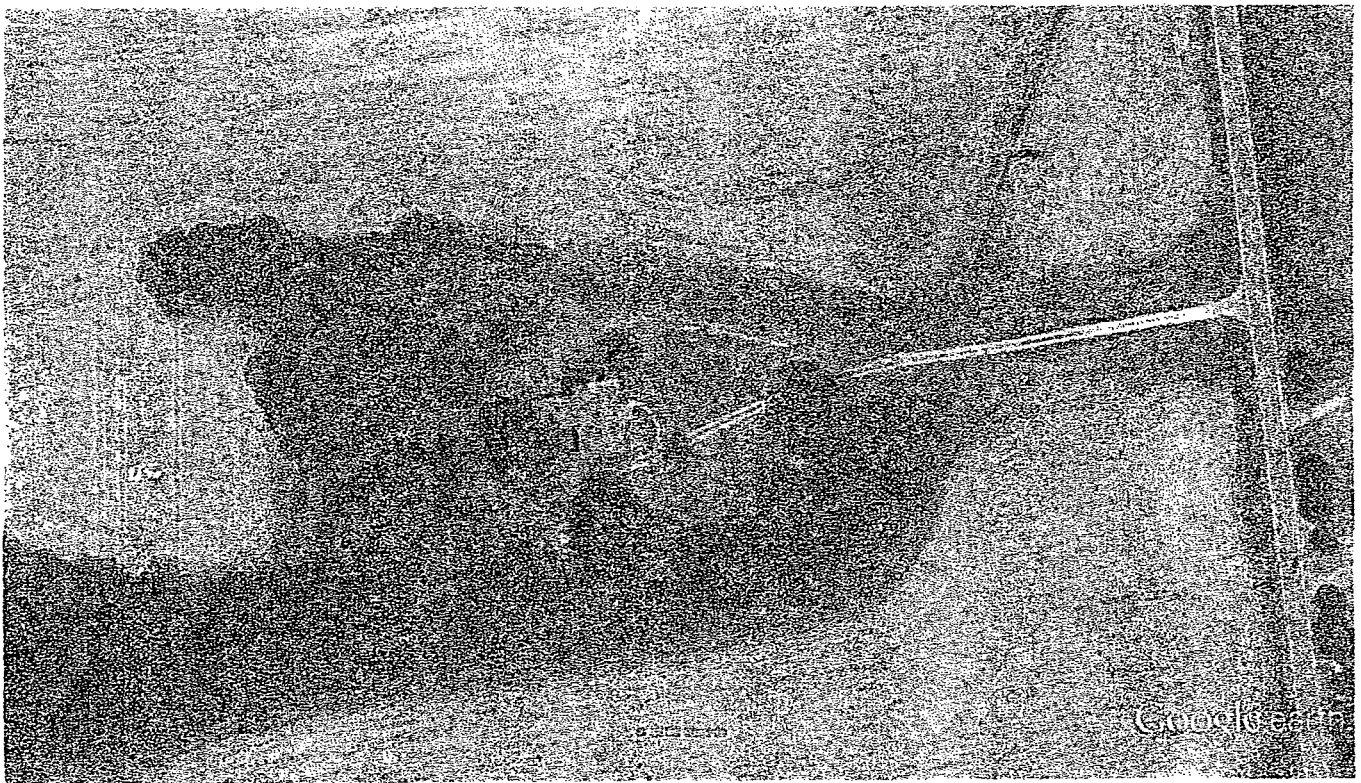


Google earth





Google earth



Google earth



AGENCY I.D.
SC0310000

INCIDENT REPORT
Lee County Sheriff Department

CASE NUMBER
11-03-0089

NCIC
INQ. ENTD.

EVENT	INCIDENT TYPE	COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
	1. 13C - INTIMIDATION	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	20(Residence/Home)		<input type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Ins <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.
	2.	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			

COPY

INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)				ZIP CODE	WEAPON TYPE
3542 ELLIOTT HWY, BISHOPVILLE, SC				29010-	
INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK
03/21/2011	19:15		03/21/2011	20:55	DISP. DATE 03/21/2011 DISP. TIME 20:55 TIME ARRIVED 21:27 DEPART. TIME 21:50
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE
SAME AS VICTIM		#1	#2	#3	J S O U

VICTIM NO. 1	VICTIM'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE	EMPLOYER PHONE
	JOSEY, SHAND WINGFIELD		#1	#2	#3	J S O U	U	F	40	N	(803) 453-5837
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ECT.						

SUBJECT NO. 1	NAME (LAST, FIRST, MIDDLE)		RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT	WEIGHT	HAIR	EYES
	JOSEY, STANLEY		W	M	59	N	05/22/1951	6'01"	198	BRO - Bro	
	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ECT.										
	ADDRESS		CITY		STATE	ZIP CODE	LOCATION NO.				

R/O RESPONDED TO INCIDENT LOCATION IN REFERENCE TO SUSPECT STANLEY JOSEY LURKING IN THE AREA OF VICTIM/COMPLAINANT SHAND JOSEY'S RESIDENCE. MR JOSEY WAS GONE FROM THE AREA PRIOR TO R/O'S ARRIVAL. MRS JOSEY DID HAVE IN HER POSSESSION A COPY OF CONDITIONS ISSUED BY A LEE COUNTY MAGISTRATE THAT WAS ADDED TO A PENDING COURTESY SUMMONS. THE CONDITIONS PERTAINED TO ANY DIRECT/INDIRECT CONTACT WITH HER OR HER IMMEDIATE FAMILY BY STANLEY JOSEY (SEE ATTACHED). COMPLAINANT WAS VISIBLY DISTURBED AT THE TIME R/O MADE CONTACT WITH HER AT HER RESIDENCE. MRS JOSEY STATED THAT AT APPROXIMATELY 1915 HRS STANLEY JOSEY ARRIVED AT A CABIN ON THE PROPERTY. SHE STATED THAT AT APPROXIMATELY 1950 HRS SHE NOTICED A DIESEL TRUCK ACROSS THE POND IDLING WITH NO LIGHTS ON. SHE STATED THAT AT APPROXIMATELY 2006 HRS SHE BEGAN TO FEAR FOR HER SAFETY AND DECIDED TO CALL HER HUSBAND WHO WAS AWAY FROM THE RESIDENCE AT THE TIME. MRS JOSEY STATED SHE BECAME AFRAID TO THE POINT WHERE SHE TURNED OFF ALL THE INTERIOR AND EXTERIOR LIGHTS TO THE RESIDENCE BECAUSE SHE FELT HE COULD PROBABLY SEE HER FROM HIS VANTAGE POINT. AT APPROXIMATELY 2025 HRS MR

JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY	JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY
---	--

TYPE (GROUP)		TOTAL VALUE
STOLEN		
DAMAGED		
BURNED		
RECOVERED		
SEIZED		
COUNTERFEIT		

STALKING/HARASSMENT
2401
16-03-1120

ADMINISTRATIVE	SUBJECT IDENTIFIED	SUBJECT LOCATED	<input checked="" type="checkbox"/> ACTIVE <input type="checkbox"/>	<input type="checkbox"/> EX-CLEAR UNDER 18	
	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> UNFOUNDED	<input type="checkbox"/> EX-CLEAR 18 AND OVER	
	REASON FOR EXCEPTIONAL CLEARANCE: 1. <input type="checkbox"/> OFFENDER DEATH 2. <input type="checkbox"/> NO PROSECUTION 3. <input type="checkbox"/> EX-TION 5. <input type="checkbox"/> JUVENILE - NO CUSTODY				
REPORTING OFFICER(S)	DATE	UNIT NUMBER	APPROVING OFFICER	DATE	UNIT NUMBER
4255 - Lt. Fletcher L. Williams	03/21/2011	4255	103 - Major Dellinger, J.D.	03/23/2011	103

FOLLOW-UP INVESTIGATION OFFICER
 YES NO

AGENCY I.D.
SC0310000

SUPPLEMENTAL INCIDENT REPORT
Lee County Sheriff Department

CASE NUMBER
11-03-0089

NCIC
INQ. ENT.D.

ORIGINAL REPORT SUPPLEMENTAL REPORT ADDITIONAL VICTIMS ADDITIONAL STOLEN PROPERTY
 MODIFIES ORIGINAL CASE STATUS CHANGE ADDITIONAL OFFENDERS ADDITIONAL RECOVERED PROPERTY

PAGE 2 of 2 PAGES

VICT./SUBJ. I.D. OVERFLOW

COMPLAINANT NAME (LAST, FIRST, MIDDLE) VICTIM RELATIONSHIP TO SUBJECT RESIDENT RACE SEX AGE D.O.B. ETH
 VICTIM # _____ #1 #2 #3 J S O U
 SUBJECT # _____ HEIGHT WEIGHT HAIR EYES FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ECT.
 RUNAWAY ADDRESS STATE ZIP CODE LOCATION NO. HOME PHONE EMPLOYER PHONE
 WANTED **CDV** D E D E
 WARRANT VICTIM NO. VISIBLE INJURY: NO YES COMPLAINT OF NON-VISIBLE INJURIES VICTIM USING ALCOHOL: NO YES UNK TWO-MAN VEHICLE DETECTIVE/SPLASMT ALONE
 ARREST EXPLAIN NO YES DRUGS: NO YES UNK ONE-MAN VEHICLE OTHER ASSISTED
 JAIL SUBJECT NO. USING ALCOHOL: NO YES USING DRUGS: NO YES TYPE: UNK
 SUMMONS SUBJECT NO. USING ALCOHOL: NO YES USING DRUGS: NO YES TYPE: UNK

VICT./SUBJ. I.D. OVERFLOW

COMPLAINANT NAME (LAST, FIRST, MIDDLE) VICTIM RELATIONSHIP TO SUBJECT RESIDENT RACE SEX AGE D.O.B. ETH
 VICTIM # _____ #1 #2 #3 J S O U
 SUBJECT # _____ HEIGHT WEIGHT HAIR EYES FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ECT.
 RUNAWAY ADDRESS CITY STATE ZIP CODE LOCATION NO. HOME PHONE EMPLOYER PHONE
 WANTED VICTIM NO. VISIBLE INJURY: NO YES COMPLAINT OF NON-VISIBLE INJURIES VICTIM USING ALCOHOL: NO YES UNK TWO-MAN VEHICLE DETECTIVE/SPLASMT ALONE
 ARREST EXPLAIN NO YES DRUGS: NO YES UNK ONE-MAN VEHICLE OTHER ASSISTED
 JAIL SUBJECT NO. USING ALCOHOL: NO YES UNK USING DRUGS: NO YES TYPE: UNK
 SUMMONS SUBJECT NO. USING ALCOHOL: NO YES UNK USING DRUGS: NO YES TYPE: UNK

NARRATIVE

JOSEY WAS IDLING ON THE OTHER DIRT ROAD PARALLEL TO THE DIRT ROAD ACROSS THE POND, ACCORDING TO COMPLAINANT. SHE STATED HE LEFT TOWARDS HIS RESIDENCE LOCATED AT 5108 ELLIOTT HWY AT APPROXIMATELY 2035 HRS. MRS JOSEY WAS OBVIOUSLY CONCERNED ABOUT MR JOSEY'S BEHAVIOR AND ACTIONS AND WAS ADVISED AN INTIMIDATION REPORT WOULD BE FILED. SHE WAS ADVISED OF HER RIGHTS AND RESPONSIBILITIES AND ISSUED VICTIM FORM NO. 010577.

VEH./GUN/JECT

STATUS TYPE VIN AND/OR LICENSE NO. BOAT HULL NO. AND/OR REG. NO.
 STOLEN VEHICLE
 RECOVERED GUN SERIAL AND/OR OWNER APPLIED NO. STATE
 FOUND BOAT YEAR OF REGISTRATION YEAR OF EXPIRATION YEAR MAKE TYPE
 TOWED LICENSE PLATE MODEL STYLE COLOR BRAND NAME CALIBER
 SUSPECT SECURITIES/BONDS, STOCKS NIC NO. DENOMINATION ISSUER SECURITIES DATE
 VICTIM ARTICLE MISCELLANEOUS

PROPERTY EST.

TYPE (GROUP)	STOLEN	DAMAGED	BURNED	RECOVERED	SEIZED	COUNTERFEIT	TOTAL VALUE

ADMINISTRATIVE

SUBJECT IDENTIFIED SUBJECT LOCATED ACTIVE ADM. CLOSED ARRESTED UNDER 18 EX-CLEAR UNDER 18
 YES NO YES NO UNFOUNDED ARRESTED 18 AND OVER EX-CLEAR 18 AND OVER

REASON FOR EXCEPTIONAL CLEARANCE: 1. OFFENDER DEATH 2. NO PROSECUTION 3. EXTRADITION DENIED 4. VICTIM DECLINES COOPERATION 5. JUVENILE - NO CUSTODY

REPORTING OFFICER(S)	DATE	UNIT NUMBER	APPROVING OFFICER	DATE	UNIT NUMBER
4255 - Lt. Fletcher L. Williams	03/21/2011	4255	103 - Major Dellinger, J.D.	03/23/2011	103
			FOLLOW-UP INVESTIGATION OFFICER		
			<input type="checkbox"/> YES <input type="checkbox"/> NO		

EXHIBIT B

**CAROLINA PROFESSIONAL
TITLE SERVICES, INC.**

45 SOUTH GUIGNARD DRIVE
SUMTER, SOUTH CAROLINA 29150
(803)775-8283 FAX (803)775-8077
EMAIL: cptsinc@sc.rr.com

SEPTEMBER 12, 2012

DANIEL W. STACY, JR.
OXNER & STACEY, P. A.
90 WALL STREET, UNIT B
PAWLEYS ISLAND, SC 29585

RE: STANLEY D. JOSEY AND DENISE JOSEY

CAROLINA PROFESSIONAL TITLE SERVICE, INC., DOES HEREBY SUBMIT THE FOLLOWING REPORT ON THE ABOVE REFERENCES. CAROLINA REPRESENTS THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE BASED UPON AN EXAMINATION OF THE RECORDS OF LEE COUNTY.

ALL DETAILED INFORMATION LISTED ON ATTACHED TABLES.


1. TAX ROLLS - CURRENT YEAR:	(2011)
2. DEEDS IN:	(-2-)
3. DEEDS OUT:	(-0-)
4. TAX LIENS:	STATE (-0-)
	FEDERAL (-0-)
5. MORTGAGES:	(-0-)
6. FINANCING STATEMENTS:	(-0-)
7. LIS PENDENS:	(-1-)
8. JUDGMENTS:	(-1-)
9. MECHANICS LIENS:	(-0-)
10. BUSINESS INVENTORY LIST	(-0-)

THIS REPORT IS PREPARED AT THE REQUEST AND UNDER THE DIRECTION OF THE ATTORNEY/LAW FIRM NOTED HEREIN PURSUANT TO SPECIFIC INSTRUCTIONS FROM SUCH ATTORNEY/LAW FIRM AND UNDER THEIR SPECIFIC DIRECTION AS TO THE MANNER IN WHICH THE SEARCH OF THE RELEVANT RECORDS WAS PERFORMED AND THE MATERIAL REPORTED HEREIN IS SOLELY FOR THE USE OF THE NAMED ATTORNEY. THE RESULTANT REPORT SHOULD, THEREFORE, NOT BE CONSIDERED AS AN OPINION ON TITLE OR AS TO ANY OTHER MATTER. CAROLINA PROFESSIONAL TITLE SERVICES, INC. HAS REPORTED THE MATTERS REQUESTED IN THE MANNER REQUESTED FOR THE PURPOSE OF THE DETERMINATION BY THE RECIPIENT AS TO THE LEGAL STATE OF THE TITLE INVOLVED. AS A RESULT, THE USE OF THIS REPORT OR THE MATERIAL CONTAINED HEREIN BY ANY OTHER PARTY IS STRICTLY PROHIBITED. THIS REPORT IS THE PROPERTY AND WORK PRODUCT OF THE NAMED ATTORNEY AND FOR HIS/HER SOLE USE

THE RIGHTS AND LIABILITIES OF THE PARTIES INVOLVED IN THIS REPORT ARE SUBJECT TO AND LIMITED BY THE AGREEMENTS OF THE PARTIES UNDER WHICH THE SEARCH WAS CONDUCTED.

CAROLINA PROFESSIONAL TITLE SERVICES, INC.

BY:



Denise C. Pavkov

DCP:amb INVOICE# 1141-7

Enclosures: statement

**ASSET CHECK – TAX ROLL
CURRENT YEAR: 2011
LEE COUNTY
STANLEY D. JOSEY AND DENISE JOSEY**

TAX AMOUNT/ PENALTY	ASSESSED VALUE	%	PAID/NOT PAID	DEED VOLUME/PAGE	PARCEL NUMBER	DESCRIPTION
\$98.71	310	6	PAID	V: D28 P: 16	TM# 059-00-00-163-000	1.50 ACRES
\$2,475.79	8100	4	PAID	V: D268 P: 16	TM# 067-00-00-038-000	137.73 ACRES
\$348.29	1140	4	PAID	V: D268 P: 16	TM# 072-00-00-042-000	177.32 ACRES
\$818.00	4710	4	PAID	V: J6 P: 129	TM# 072-00-00-078-000	3.68 ACRES

**ASSET CHECK - DEEDS IN
LEE COUNTY
STANLEY D. JOSEY AND DENISE JOSEY**

GRANTEE	GRANTOR	DATED/RECORDED	VOLUME/PAGE	CONSIDERATION	DESCRIPTION
STANLEY JOSEY	STONEY RUN FARMS, LIMITED PARTNERSHIP, BY CECIL L. JOSEY, JR. GENERAL PARTNER AND AS DULY ELECTED REPRESENTATIVE BY A MAJORITY INTEREST IN THE PARTNERSHIP	D: 09-22-2010 R: 09-23-2010	V: D268 P: 16	\$5.00	1. 1,200 ACRES (+/-), LESS HOWEVER 64 ACRES (+/-) AND 97 ACRES (+/-) = TM# 072-00-00-042 2. 181 ACRES (+/-) = TM# 072-00-00-042 3. 1.5 ACRES (+/-) = TM# 059-00-00-163
STANLEY D. JOSEY	C. W. JOSEY, JR.	D: 03-08-1994 R: 03-14-1994	V: J6 P: 129	\$5.00 + L&A	3.68 ACRES - PLAT B1-17 TM# PT.072-00-00-042

**ASSET CHECK – LIS PENDENS
LEE COUNTY
STANLEY D. JOSEY AND DENISE JOSEY**

NUMBER	PLAINTIFF	DEFENDANT	RECORDED DATE
LP#2010-LP-31-442	CECIL L. JOSEY, JR.	STANLEY D. JOSEY, COURTNEY GAMBLE, SPENCER JOSEY, ELIZABETH ANN GEDDINGS, CECIL L. JOSEY, JR. AS TRUSTEE OF THE JOSEY FAMILY TRUST	09-30-2010

**ASSET CHECK – JUDGMENTS
LEE COUNTY
STANLEY D. JOSEY AND DENISE JOSEY**

NUMBER	PLAINTIFF	DEFENDANT	RECORDED DATE	CAUSE
2010-CP-31-195	CECIL L. JOSEY, JR.	STANLEY D. JOSEY, COURTNEY GAMBLE, SPENCER JOSEY, ELIZABETH ANN GEDDINGS, CECIL L. JOSEY, JR. AS TRUSTEE OF THE JOSEY FAMILY TRUST	07-07-2011	PARTITION

ATTORNEY: Dan Stacy

RE: Jascy

DATE: 9-11-12

CLIENT COPIES ATTACHED

DEEDS: 0268-16 J6-129

PLATS: 61-17

MORTGAGES: _____

JUDGMENTS: 2010-CP-31-195

LIS PENDENS: _____

FINANCING STATEMENTS: _____

STATE TAX LIENS: _____

FEDERAL TAX LIENS: _____

EASEMENTS: _____

RESTRICTIVE COVENANTS: _____

ESTATES: _____

OTHER DOCUMENTS: tax bills, assessor's card

I hereby certify that the within Deed has been this 24th day of Sept. AD 2010 Recorded in Book 2028 Of Deeds, Page 10 For Stanley Josey Auditor County

1307 BK00268 PG16

000001307
RECORDED 09/23/2010 12:09:05PM
BK:00268 Ps:00016 Pages:4
Fee:10.00 State:0.00
COUNTY:0.00 Except:-----
James I. Davis, Clerk of Court
Lee County, SC

State of South Carolina,

County of Lee

Know All Men By These

Presents, That

Stoney Run Farms, Limited Partnership, by Cecil L. Josey, Jr., General Partner and as duly elected representative by a majority interest in the partnership

in the State aforesaid, in consideration of the sum of Five and no/100 (\$5.00) Dollars to it in hand paid at and before the sealing of these presents, by STANLEY JOSEY

in the State aforesaid, (the receipt whereof is hereby acknowledged) has granted, bargained, sold and released, and by these Presents does grant, bargain, sell and release, unto the said Stanley Josey, his heirs and assigns, forever, the following described property:

PARCEL NO. 1: All that certain piece, parcel or tract of land containing One Thousand Two Hundred (1,200) acres, more or less, situate, lying and being in the Mt. Clio Township, Lee County, State of South Carolina, situate on both sides of State Road S-31-44, South Carolina Highway 527, State Road S-31-53; and State Road S-31-278, and being bounded and described as follows: NORTH by lands said to belong to Lee County Memorial Hospital, by lands of Herman Felix and by lands of Ruby B. Windham; NORTHEAST by a branch which separates this land from lands of the heirs of Woster Law, EAST by a branch which separates this tract

CU

of land from land said to belong to R. E. Fountain, Jr. and by lands of Katie B. Mayes, and by land said to belong to Barbara A. Hill and by State Road S-31-53, by lands of Jack Player, by lands said to belong to Lawrence Lowery and by land said to belong to Charles Ingram Lumber Company; South by lands of Charles Ingram Lumber Company, by lands of Inez Mack, and by lands of Hattie Lowery, et al, and by State Road S-31-44 and by South Carolina Highway 527; WEST by lands of C. W. Josey, Jr., lands of Ema Lee Atkinson and possibly lands of Kirkley.

LESS, HOWEVER, approximately sixty-four (64) acres, more or less being irregular in shape and being bounded as follows: North by lands of Windham; East by lands of Laws, Chaplin and Tolson; and WEST by Tram Road, S-31-53.

LESS, HOWEVER, ninety-seven (97) acres, more or less fronting on the eastern side of SC Highway 527 and being bounded as described: South by Wells Church Road, S-31-34; West by lands of Satterfield and Richardson; and North by lands of McElveen. Tax Map No. 067-00-00-038

PARCEL NO. 2: All that certain piece, parcel or tract of land, with improvements thereon, situate, lying and being in the County of Lee, State of South Carolina, containing One Hundred eighty-one (181) acres, more or less, being known as the Home Place of the late C. S. Brown, and being bounded and described as follows: on the North and east by lands of the Estate of W. W. Player; on the South by lands of S. M. Rhodes, and on the West by the Black River Swamp.

Tax Map No. 072-00-00-042

PARCEL NO. 3: All that certain piece, parcel or lot of land containing one and one half (1 1/2) acres, more or less, situate, lying and being in Riverside School District, in St. Charles, County of Lee; State of South Carolina and being bounded and described as follows, to wit: on the North by lands of the Estate of T. E. Cooper; on the East by lands of the Estate of T. E. Cooper; on the South by the Estate of T. E. Cooper; and on the West by the Bishopville-St. Charles Public road.

Tax Map No. 059-0-00-0163

The above described parcels being a portion of the lands conveyed to the grantor and grantee herein by deed recorded in Deed Book G-6 at page 267 with a corrective deed recorded in Deed Book I-6 at page 67 in the office of the Clerk of Court for Lee County, SC.

Grantee's address: 5108 Elliott Hwy., Lynchburg, SC 29080

TOGETHER with all and singular, the rights, ~~members, hereditaments and~~ ^{1507 BKD0268 FG17} appurtenances to the said premises belonging or in anywise incident or appertaining.

TO HAVE AND TO HOLD all and singular the said premises before mentioned unto the said Stanley Josey, his Heirs and Assigns forever.

And the said Stoney Run Farms, Limited Partnership, by Cecil L. Josey, Jr.,

CCJ

as General Partner and as duly elected representative by a majority interest in the partnership, does hereby bind itself and its successors, to warrant and forever defend all and singular the said premises unto the said Stanley Josey, his heirs and assigns, against itself and its successors and against every person whomsoever lawfully claiming or to claim the same, or any part thereof.

IN WITNESS WHEREOF Stoney Run Farms, Limited Partnership has caused these presents to be executed in its name by Cecil L. Josey, Jr., its General Partner and as duly elected representative by a majority interest in the partnership, and its corporate seal to be hereto affixed this 20th day of Sept in the year of our Lord, two thousand and ten, and in the two hundred and thirty-fifth year of the Sovereignty and Independence of the United States of America.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF

Charles H. Arrant
Witness
SPV
Witness

Stoney Run Farms, Limited Partnership
By Cecil L. Josey, Jr.
Cecil L. Josey, Jr. as General Partner and as duly elected Representative by a majority Interest in the Partnership

STATE OF SOUTH CAROLINA.
LEE COUNTY.

1307 BKD0268 PG18

I, Charles H. Arrant, a Notary Public for South Carolina, do hereby certify that the Grantor, Stoney Run Farms, Limited Partnership by Cecil L. Josey, Jr., its General Partner and duly elected representative by a majority interest in the Partnership, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my Hand and Official Seal, this 20th day of September, 2010.

Charles H. Arrant (LS)
NOTARY PUBLIC FOR S. C.
My Commission expires 3-31-2018

STATE OF SOUTH CAROLINA
COUNTY OF Lee

AFFIDAVIT

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this Affidavit and I understand such information.
2. The property being transferred is located at _____ bearing Lee
County Tax Map Number 067-038, 072-042 was transferred by Harvey Lee
Hanna Limited Partnership Stadley
Jewery on 9/22/10
3. Check one of the following: The Deed is
 - (a) _____ subject to the deed recording fee as a transfer for consideration paid or to be paid in money's worth.
 - (b) _____ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
 - (c) exempt from the deed recording fee because (See information section of affidavit)
transfer from family partnership to a partner
(If exempt, please skip items 4, 5, and 6 of this affidavit)
4. Check one of the following if either item 3(a) or item 3(b) above has been checked (See information section of this Affidavit):
 - (a) _____ The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of _____.
 - (b) _____ The fee is computed on the fair market value of the realty which is _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is _____.
5. Check Yes _____ or No to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "Yes," the amount of the outstanding balance of this lien or encumbrance is: _____.
6. The Deed recording fee is computed as follows:
 - (a) Place the amount listed in item 4 above here: _____
 - (b) Place the amount listed in item 5 above here: _____
(if no amount is listed, place zero here.)
 - (c) Subtract Line 6(b) from Line 6(a) and place result here: _____
7. The deed recording fee due is based on the amount listed on Line 6(c) above and the deed recording fee due is: 0.00
8. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transactions: _____
9. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

Sworn to before me this 22nd
day of Sept 2010
Charles W. Cerny
Notary Public for 3-31-2010

Cecil L. Jusey Jr.
Responsible Person Connected with the Transaction
Cecil L. Jusey Jr.
Print or Type Name Here

3897-A

STATE OF SOUTH CAROLINA

KNOW ALL MEN BY THESE PRESENTS, that C. W. Josey, Jr., of the State aforesaid, for and in consideration of the sum of five and no/100 (\$5.00) Dollars and other valuable consideration, to me/us in hand paid at and before the sealing of these presents by Stanley D. Josey, grantee(s), in the State aforesaid (the receipt whereof is hereby acknowledged), have granted, bargained, sold and released, unto the said grantee(s), his/her/their heirs, successors and assigns, to wit:

SEE EXHIBIT A ATTACHED HERETO AND MADE A PART HEREOF.

Derivation: Carlton S. Brown, rec. Jan. 21, 1964, Vol. Z-1 p. 28-A.

This conveyance is subject to all visible and recorded easements, covenants and rights-of-way affecting said property.

Together with all and singular the rights, members, hereditaments and appurtenances to the said premises belonging or in anywise appertaining.

TO HAVE AND TO HOLD, all and singular the said premises before mentioned unto the said grantee(s), his/her/their/its heirs, successors and assigns, forever.

And I do hereby bind my heirs and successors, executors and administrators to warrant and forever defend all and singular the said premises unto the said grantee(s), his/her/their/its heirs, successors and assigns against me and my heirs, successors and all other persons whomsoever lawfully claiming or to claim the same or any part thereof.

WITNESS my hand and seal this 8 day of March, 1994, in the two hundred eighteenth year of sovereignty and independence of the United States of America.

Signed, sealed and delivered in the presence of:

mbn

C. W. Josey, Jr.
C. W. Josey, Jr.

Kimberly S. Hudson

7

STATE OF South Carolina)
COUNTY OF Sumter)

PERSONALLY appeared before me the undersigned witness, who being sworn says that s(he) saw the within named grantors sign and seal as his/her/their act and deed, deliver the within written deed; and that s(he) with the other deponent witnessed the execution thereof.

Sworn to before me this 8
day of March 1998

McBride

Kimberly S. Hudson

Notary Public for SC
My Commission Expires: 5/17/97

GRANTEE'S ADDRESS:
Mr. Stanley D. Josey
Rt 2.
Lynchburg SC

RETURN TO:
Richard L. Booth
P.O. Box 2756
Sumter, SC 29151

True Consideration: Love & Affection (not for publication)

NO TITLE EXAMINATION OR CERTIFICATION CONDUCTED BY RICHARD L. BOOTH

EXHIBIT A

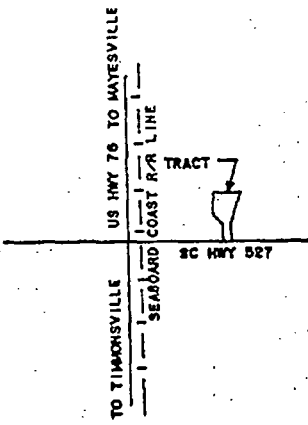
All that piece, parcel or tract of land, together with any improvements thereon, lying, being and situate in Lee County, State of South Carolina, being more particularly shown and designated as 3.68 acres as on a plat of Julian B. Allen, RLS, dated January 5, 1994, recorded in the Office of the RMC for Lee County in Plat Book 81 at page 17. The said lot has such boundaries, metes, courses and distances as are shown on said plat which are incorporated herein in accordance with the provision of Section 30-5-250 of the Code of Laws of South Carolina, 1976, as amended. Tax Map Number 072-00-00-042 (part).

I hereby certify that the within paper was filed for record in my office on this _____ day of _____, 19____, and was immediately indexed upon the proper indexes and duly recorded in Book _____ Page _____ Clerk of Court, Common Pleas and General Sessions Lee County, SC

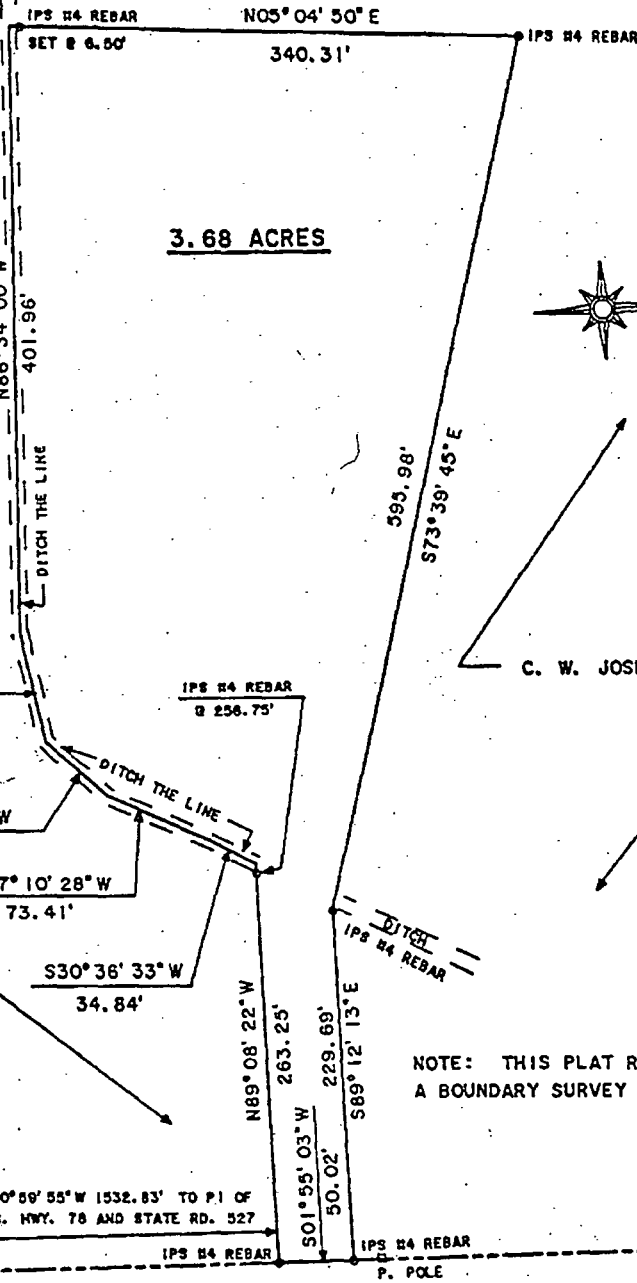
I hereby certify that the within deed has been recorded in Book _____ Page _____ of Book Page _____ and duly recorded in Book _____ Page _____ Auditor Lee County

I hereby certify that the within Deed has been
this... 14th... day of March...
A.D. 1994... Recorded in Book... 21...
of Deeds, Page... 501...
... Cecil F. Stinson... Auditor
For... Lee... County

I hereby certify that the within paper was
filed for record in my office at 9:00 A. M.
o'clock on the 14th day of March 1994
and was immediately entered upon the
proper indexes and duly recorded in,
Book 26 Page 129
Clerk of Court Common Pleas and General Sessions
of Lee County, SC James L. Devin



LOCATION MAP
NOT TO SCALE



C. W. JOSEY, JR.

NOTE: THIS PLAT REPRESENTS
A BOUNDARY SURVEY ONLY.

200°59'55"W 1532.83' TO P.I. OF
U.S. HWY. 76 AND STATE RD. 527

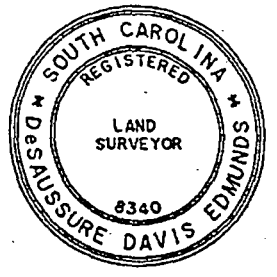
I hereby certify that the within paper was
filed for record in my office at 9:00 A.M.
o'clock on the 10 day of Feb. 1994
and was immediately entered upon the S.
proper indexes and duly recorded in
Book 81 Page 17
Clerk of Court Common Pleas and General Sessions
of Lee County, SC *James S. Davis*

S. C. HWY. NO. 527 66' R/W



SOUTH CAROLINA

LEE COUNTY



THIS PLAT REPRESENTS A 3.68 ACRES TRACT OF LAND CUT
FROM A 181 ACRES TRACT DESCRIBED IN DEED BOOK 21
AT PAGE 28. THIS SURVEY WAS REQUESTED BY:

C. W. JOSEY, JR.

EDMUNDS LAND SURVEYORS, INC.
2 LAW RANGE
SUMNER, S.C. 29150
PH: 803-775-1030

I HEREBY STATE THAT TO THE BEST OF MY KNOWLEDGE,
INFORMATION, AND BELIEF, THE SURVEY SHOWN HEREIN
WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE
MINIMUM STANDARDS MANUAL FOR THE PRACTICE OF LAND
SURVEYING IN SOUTH CAROLINA, AND MEETS OR EXCEEDS THE
REQUIREMENTS FOR A CLASS A SURVEY AS SPECIFIED THEREIN.
ALSO THERE ARE NO VISIBLE ENCROACHMENTS OR PROJECTIONS
OTHER THAN SHOWN.
IS PROPERTY IN A 100 YEAR FIA FLOOD HAZARD AREA? N/A
PARCEL NO. N/A

James S. Davis

1" = 100'
SCALE

72 - 42 (PART)
TAX MAP

JANUARY 5, 1994
DATE

118/18 94003A
SK. FILE

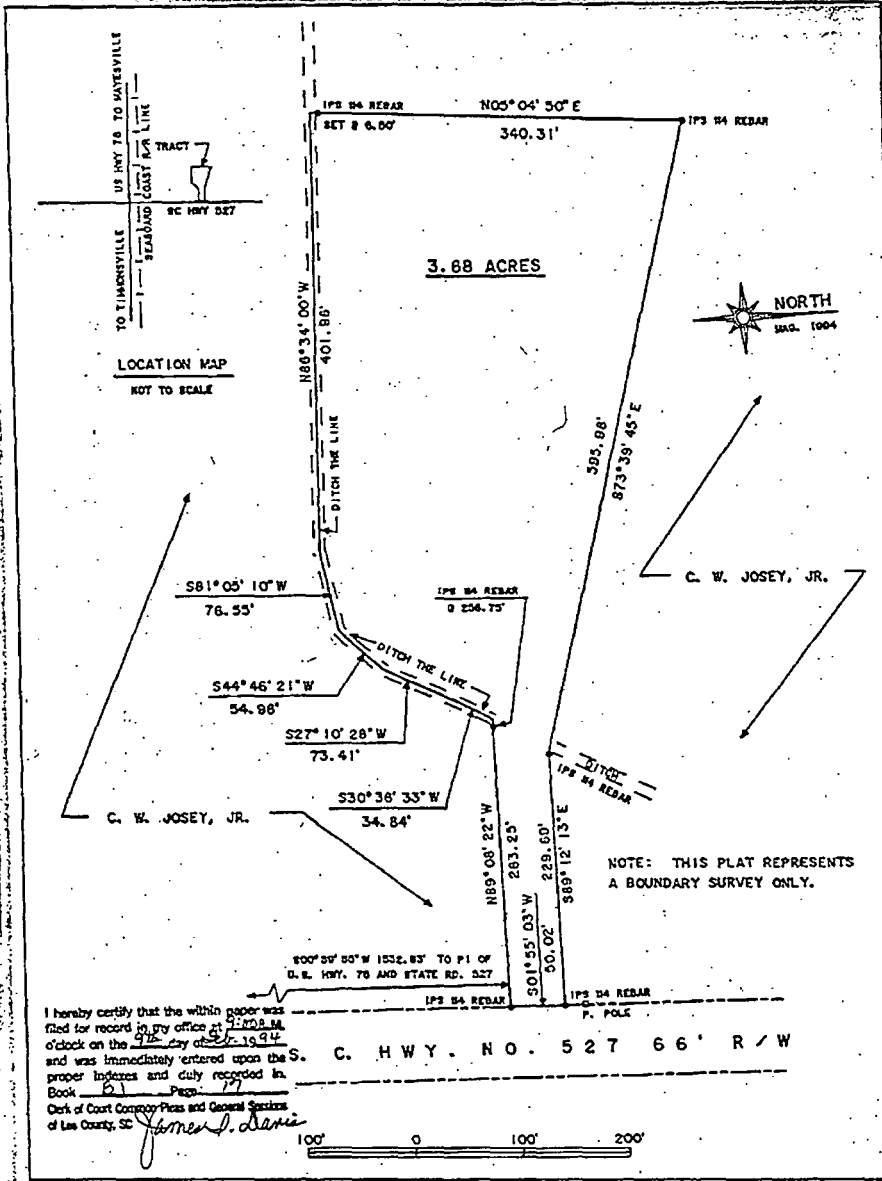
LEE COUNTY

ASSESSOR

YEAR 2011

PAGE 1196

NAME	MAP NUMBER SALE AMOUNT	DISTRICT TOWN CODE SEQUENCE #	CLASS	ACRES	LOT	VALUE-LAND	LAND ASMT	IMP	VAL-IMP	IMP. ASMT	ST.# ST. NAME PRIOR OWNER
HOMESTEAD # H.E. %	MOBILE HOME INFORMATION DEED INFORMATION	LOCATION/DESCRIPTION						UNIT			
1	JOSEY LUTHER F III & GWENDOLYN 3493 MANVILLE-ST CHARLES RD MAYESVILLE SC 29104	060-00-00-120-001 00/00/0000	01 - 00019839	NA				3	32950	1320	3493 MANVILLE-ST CHARLES RD
				TOTAL				3	32950	1320	
											CURR MKT APPR 32950 CAP MKT VALUE 32950 TOTAL ASMT 1320
2	JOSEY MARY B 3565 MANVILLE-ST CHARLES RD MAYESVILLE SC 29104	060-00-00-037-000 07/19/2010	01 - 00831190	AG OO MV	63.54 1.00	8080 5000 86610	330 200	3 1	6800 56750	270 2270	3565 MANVILLE-ST CHARLES RD JOSEY LUTHER
	H000951	0 0 U-3 0687	0000	TOTAL	64.54	13080	530	4	63550	2540	LAST YR MARKET APPR= 155160 LAST YEAR AG APPR= 8080
											CURR MKT APPR 155160 CAP MKT VALUE 155160 TOTAL ASMT 3070
3	JOSEY STANLEY 5108 ELLIOTT HWY LYNCHBURG SC 29080	059-00-00-163-000 09/22/2010	01 - 00825890	RG	1.50	5100	310				STONEY RUN FARMS LTD PART
		268 16 G-6 267 J-1	0000 0303	TOTAL	1.50	5100	310				LAST YR MARKET APPR= 5500
											CURR MKT APPR 5100 CAP MKT VALUE 5100 TOTAL ASMT 310
4	JOSEY STANLEY 5108 ELLIOTT HWY LYNCHBURG SC 29080	067-00-00-038-000 09/22/2010	01 - 00891190	AG MV	1037.73	202483 1443695	8100				STONEY RUN FARMS LTD PART
		268 16 G-6 267 E K-4	0124 0313	TOTAL	1037.73	202483	8100				LAST YR MARKET APPR= 1680395 LAST YEAR AG APPR= 240430
											CURR MKT APPR 1443695 CAP MKT VALUE 1443695 TOTAL ASMT 8100
5	JOSEY STANLEY 5108 ELLIOTT HWY LYNCHBURG SC 29080	072-00-00-042-000 09/22/2010	01 - 00980790	AG MV	177.32	28600 166500	1140				STONEY RUN FARMS LTD PART
		268 16 G-6 267 Z-1	0000 0028	TOTAL	177.32	28600	1140				LAST YR MARKET APPR= 251910 LAST YEAR AG APPR= 28600
											CURR MKT APPR 166500 CAP MKT VALUE 166500 TOTAL ASMT 1140
6	JOSEY STANLEY D 5108 ELLIOTT HWY LYNCHBURG SC 29080	072-00-00-078-000 03/08/1994	01 - 01299594	OO	3.68	9500	380	2	108180	4330	5108 ELLIOTT HWY JOSEY C W JR
		J-6 129 B-1	17	TOTAL	3.68	9500	380	2	108180	4330	LAST YR MARKET APPR= 87680
											CURR MKT APPR 117680 CAP MKT VALUE 117680 TOTAL ASMT 4710



I hereby certify that the within paper was filed for record in my office at 2:00 P.M. o'clock on the 7th day of Jan. 1994 and was immediately entered upon the S. proper indexes and duly recorded in Book 21 Page 77
 Clerk of Court Computer Files and General Services of Lee County, SC *James J. Davis*

S. C. HWY. NO. 527 66' R/W

SOUTH CAROLINA		LEE COUNTY	
	THIS PLAT REPRESENTS A 3.88 ACRES TRACT OF LAND CUT FROM A 181 ACRES TRACT DESCRIBED IN DEED BOOK 21 AT PAGE 28. THIS SURVEY WAS REQUESTED BY: <p style="text-align: center;">C. W. JOSEY, JR.</p>		
	EDMUNDS LAND SURVEYORS, INC. 2 LAW RANGE SUMNER, S.C. 29150 PH: 803-773-1030		I HEREBY STATE THAT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF, THE SURVEY SHOWN HEREIN WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE MINIMUM STANDARDS MANUAL FOR THE PRACTICE OF LAND SURVEYING IN SOUTH CAROLINA AND MEETS OR EXCEEDS THE REQUIREMENTS FOR A CLASS A SURVEY AS SPECIFIED THEREIN. ALSO THERE ARE NO VISIBLE ENCROACHMENTS OR PROJECTIONS OTHER THAN SHOWN. IS PROPERTY IN A 100 YEAR FIA FLOOD HAZARD AREA? N/A PARCEL NO. N/A
<i>James J. Davis</i> 1" = 100' SCALE	72 - 42 (PART) TAX MAP	JANUARY 5, 1994 DATE	118/18 94003A FILE NO.

LEE COUNTY		ASSESSOR										YEAR 2011		PAGE 1196						
NAME	MAP NUMBER SCALE AMOUNT	DISTRICT TOWN CODE SEQUENCE #	CLASS	ACRES	LOT	VALUE/LAND	LAND/ASMT	RP	VAL-RP	TAX. ASMT	ST. #	ST. NAME	PRIOR OWNER							
HOMESTEAD # H.R.N.	DATE # STR	MOBILE HOME INFORMATION										UNIT								
DEED INFORMATION												LOCATION/DESCRIPTION								
1	JOSHY LUTHER V YI & GRENDOLYN 3493 MANVILLE-ST CHARLES RD MAYESVILLE SC 29104	060-00-00-120-001 00/00/0000	01 - 00019839	RA						3	32950	1320	3493 MANVILLE-ST CHARLES RD							
TOTAL												3	32950	1320						
MH 1999 40X24 FLEETWOOD/COUNT WHITE/BLACK HCPLX46AB08123-CU12 5780												CURR MKT APPR 32950 CAP MKT VALUE 32950 TOTAL ASMT 1320								
2	JOSHY MARY B 3565 MANVILLE-ST CHARLES RD MAYESVILLE SC 29104 H000951	060-00-00-037-000 07/19/2010 0 0 0-3 0687	01 - 00831190 0000	AU CO MV	63.54 1.00	8080 5000 86610	330 200	3 1	6800 56750	270 2270		3565 MANVILLE-ST CHARLES RD JOSHY LUTHER								
TOTAL												4	63550	2540	LAST YR MARKET APPR= 155160 LAST YEAR AG APPR= 8080		2			
												CURR MKT APPR 155160 CAP MKT VALUE 155160 TOTAL ASMT 3070								
3	JOSHY STANLEY 5108 ELLIOTT HWY LYNCHBURG SC 29080	059-00-00-163-000 09/22/2010 268 16 0-6 267 J-1	01 - 00825890 0303	RO	1.50	5100	310					STONEY RUN FARMS LTD PART								
TOTAL													5100	310	LAST YR MARKET APPR= 5500		3			
												CURR MKT APPR 5100 CAP MKT VALUE 5100 TOTAL ASMT 310								
4	JOSHY STANLEY 5108 ELLIOTT HWY LYNCHBURG SC 29080	067-00-00-038-000 09/22/2010 268 16 0-6 267 E K-4	01 - 00891190 0313	AU MV	1037.73	202483 1443695	8100					STONEY RUN FARMS LTD PART								
TOTAL													202483	8100	LAST YR MARKET APPR= 1680395 LAST YEAR AG APPR= 240430		4			
												CURR MKT APPR 1443695 CAP MKT VALUE 1443695 TOTAL ASMT 8100								
5	JOSHY STANLEY 5108 ELLIOTT HWY LYNCHBURG SC 29080	072-00-00-042-000 09/22/2010 268 16 0-6 267 Z-1	01 - 00980790 0028	AG MV	177.32	28600 166500	1140					STONEY RUN FARMS LTD PART								
TOTAL													28600	1140	LAST YR MARKET APPR= 251910 LAST YEAR AG APPR= 28600		5			
												CURR MKT APPR 166500 CAP MKT VALUE 166500 TOTAL ASMT 1140								
6	JOSHY STANLEY D 5108 ELLIOTT HWY LYNCHBURG SC 29080	072-00-00-078-000 03/08/1994 J-6 129 B-1 17	01 - 01299594	OO	3.68	9500	380	2	108180	4330		5108 ELLIOTT HWY JOSHY C W JR								
TOTAL													9500	380	2	108180	4330	LAST YR MARKET APPR= 87680		6
												CURR MKT APPR 117680 CAP MKT VALUE 117680 TOTAL ASMT 4710								