

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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AUG 24 2016

SC Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY
In the Court of Common Pleas

The Honorable R. Lawton McIntosh, Presiding Judge

Case No. 2014-ES-45-00179

Appellate Case No. 2016-000332

Gwendolyn Leveritt..... Respondent,

v.

Lorine C. Pressley as Personal Representative of the Estate of Ervin Christopher Pressley,
..... Appellant.

RESPONDENT'S DESIGNATION OF MATTER FOR THE RECORD ON APPEAL

J. René Josey, Esquire
S.C. Bar #3230
319 S. Irby Street
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Florence, South Carolina 29501
(843) 662-9008
(843) 667-0828 fax
Email: RJosev@turnerpadget.com

ATTORNEYS FOR RESPONDENT

Other Counsel of Record:

Gregory B. Askins, Esquire
Larry G. Reddeck, Esquire

Respondent proposes the following to be included in the Record on Appeal:

1. RECORD ON APPEAL TO THE CIRCUIT COURT FROM THE PROBATE COURT

(CASE NO. : 2014-ES-45-00179) including:

- a. Final Order of Probate Judge Betty F. Matthews, filed on April 2, 2015
 - b. Petition of Gwendolyn Leveritt filed December 30, 2014
 - c. Answer of the Estate of Ervin Christopher Pressley filed February 26, 2015
 - d. Transcript of Hearing of March 12, 2015
 - e. Last Will and Testament of Ervin Christopher Pressley dated February 5, 2008
 - f. Judgment of Divorce in New York dated October 7, 2014 with Findings of Fact dated September 24, 2014 (Respondent's Exhibit 1)
 - g. Decision/Order of the New York Court dated June 30, 2014 (Respondent's Exhibit 3)
 - h. Order to Show Cause dated March 7, 2014 with Supporting Affidavit and Exhibits Thereto Including Stipulation of Settlement dated November 14, 2012
2. Order Denying Reconsideration of The Honorable R. Lawton McIntosh filed January 11, 2016;
3. Order on Appeal from Probate Court of The Honorable R. Lawton McIntosh filed December 9, 2015;
4. Transcript of Circuit Court Appeal on October 28, 2015;

Florence, South Carolina

August 22, 2016

TURNER, PADGET, GRAHAM & LANEY, P. A.

By: 

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PROOF OF SERVICE

The undersigned certifies that he is employed with the law firm of Turner, Padget, Graham & Laney, P. A., attorneys for the Respondent, Gwendolyn Leveritt, and that he has mailed a copy of the **Initial Brief and Designation Of Matter** to the Appellant's Attorneys listed below this 22 day of August 2016, with proper postage attached thereto:

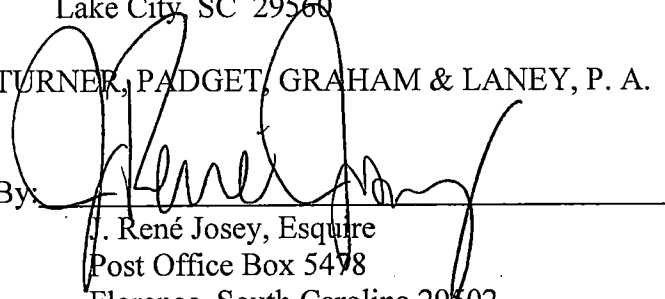
Gregory B. Askins, Esquire
Askins Chandler & Askins
PO Box 10
Hemingway, SC 29554

Florence, South Carolina

August 22, 2016

Larry G. Reddeck, Esquire
Nettles, Turbeville & Reddeck
P.O. Box 699
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TURNER, PADGET, GRAHAM & LANEY, P. A.

By: 
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ATTORNEYS FOR THE RESPONDENT

Turner | Padget

REPLY TO:

J. René Josey

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Writer's Direct Dial: (843) 656-4451
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August 22, 2016

The Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Re: Gwendolyn Leveritt v. Lorine C. Pressley as Personal Representative of the Estate of Ervin Christopher Pressley
Appellate Case No. 2016-000332
TPGL File No. 13564.101

Dear Ms. Kitchings:

Please find enclosed the following documents with regard to the above-referenced matter for filing:

1. The original and one copy of Respondents' Initial Brief and Designation of Matter to Be Included in the Record on Appeal; and
2. The original and one copy of the Proof of Service for these documents.

Please file the original documents and return clocked copies to me in the self-addressed stamped envelope provided. Thank you for your assistance and please contact me if you have any questions.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

J. René Josey

JRJ:vlb
Enclosures

Cc: Gwendolyn Leveritt (w/enclosures)
Larry G. Reddeck, Esquire (w/enclosures)
Gregory B. Askins, Esquire (w/enclosures)

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