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SC Court of Appeals

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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

Case No. 2015-000342

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.

RECORD ON APPEAL
VOLUME II OF II

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Attorney for Respondents

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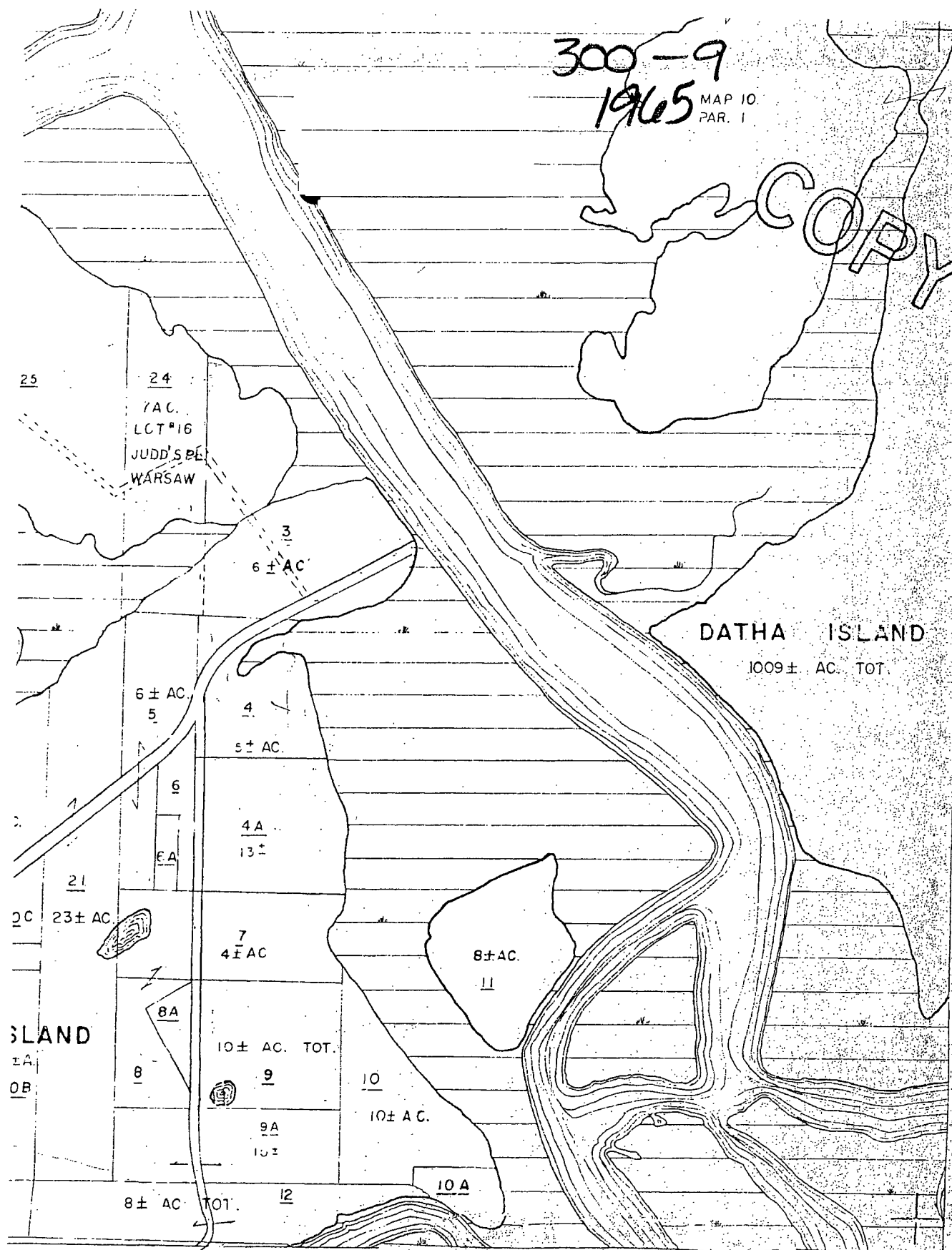
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300-9
1965 MAP 10.
PAR. 1

COPY



BEAUFORT COUNTY, SOUTH CAR

DATE: 1954
REVISED 1965

SCALE 300-9

Plaintiff's Exhibit 6

1296/1

6/12/99

26113

1

PROBATE COURT

STATE OF SOUTH CAROLINA
COUNTY OF

IN THE MATTER OF Estate of James Josephus Taylor

CASE NUMBER 99ES0700290

DEED OF DISTRIBUTION

WHEREAS, the decedent died on the 6 day of March 1999 and,

WHEREAS, the estate of the decedent is being administered in the Probate Court for Beaufort County, South Carolina in File # 99ES0700290 and,

WHEREAS, the grantee herein is either a beneficiary or heir at law, as appropriate, of the decedent; and,

WHEREAS, the undersigned Personal Representative is the duly appointed and qualified fiduciary in this matter; and,

NOW, THEREFORE, in accordance with the laws of the State of South Carolina, the Personal Representative has granted bargained, sold and released, and by these Presents does grant, bargain, sell and release to:

Name: Maxine Taylor
Address: 3504 A Mason Way
Idangle VA 22172

the following described property: Pls. See Attached Deed

Plaintiff's Exhibit 7

R300-9-6A-1 22

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises/Property belonging, or in anywise incident or appertaining.

TO HAVE AND TO HOLD, all and singular, the said Premises/Property unto the said Maxine Taylor their heirs and assigns forever.

IN WITNESS WHEREOF, the undersigned, as Personal Representative of the estate of the decedent, has executed this Deed, this 25 day of May 2005

SIGNED, SEALED AND DELIVERED IN THE PRESENCE OF

Estate of: Estate of James Josephus Taylor

by Signature: Maxine Taylor

Witness: Wilda M. Bolles

Witness: [Signature]

STATE OF SOUTH CAROLINA
COUNTY OF

PROBATE

PERSONALLY appeared before me Wilda M. Bolles

and made oath that he/she saw the within named Personal Representative(s) sign, seal, and as their act and deed, deliver the within written Deed, and that he/she with

hera Jenkins witnessed the execution thereof.

SWORN to before me this 26 day of May 2005

Witness Signature: Wilda M. Bolles

[Signature]
Notary Public for South Carolina
My Commission Expires: 7-16-2005

200-9-407

FORM NO. 119-QUIT-CLAIM-DEED
WALKER, EVANS & COSSWELL CO., CHARLESTON, S.C.

152
102
P152

THE STATE OF SOUTH CAROLINA,

To All Whom These Presents May Come:

James Taylor, Joe Taylor, Henry Taylor, Robbie Taylor, George Taylor
Bessie Goins, Eloise Randell, Georgia Wiggins

~~XXXXXXXXXX~~

SEND GREETING:

Whereas Phoebe Taylor, deceased, late of Wasaw Island in the County of Beaufort in the State aforesaid, died intestate, was possessed of four (4) acres of land, leaving eight issue; James Taylor, Joe Taylor, Henry Taylor, Robbie Taylor, George Taylor, Bessie Goins, Eloise Randell and Georgia Wiggins as her only heirs at law, therefore

NOW, KNOW ALL MEN BY THESE PRESENTS, That We the said James Taylor, Joe Taylor, Henry Taylor, Robbie Taylor, George Taylor, Bessie Goins, Eloise Randell and George Wiggins

in consideration of the premises and also in consideration of the sum of TEN (10) dollars and love and affection which we hold for the grantees to us in hand paid at and before the sealing and delivery of these presents by

James Taylor

(the receipt whereof is hereby acknowledged) have remised, released and forever quit-claimed, and by these presents do remise, release and forever quit-claim unto the said James Taylor

All of that certain piece, parcel or tract of land situated, lying, and being on Wasaw Island, Beaufort County, South Carolina, containing One and One Sixth (1 1/6) acres, more or less, and being more particular bounded and described as follows, to wit: Beginning at a point where lands of Gardner meet this tract on the public road, ~~thence~~ thence Northerly for a distance of 413 feet, more or less, thence due West for a distance of 146 feet to lands of the Estate of William Taylor, Thence South along the lands of Taylor for a distance of 418 feet, more or less, to lands of Gardner, East for a distance of 149 feet, more or less to the public road and Point of Beginning. Said land hereby conveyed is the Southern portion of the same land conveyed to Phoebe Taylor By deed recorded in the Office of the Clerk of Court for Beaufort County at Book 53 page 501.

Plaintiff's Exhibit 8

TOGETHER with all and singular the rights, members, hereditaments and appurtenance 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

James Taylor

heirs and assigns, forever—so that neither the said

Grantors

nor heirs, nor any other person or persons, claiming under or them, shall at any time hereafter by any way or means, have, claim or demand any right or title to the aforesaid premises or appurtenances, or any part of parcel thereof, forever.

Witness our hands and seals this 22 day of June

in the year of our Lord one thousand nine hundred and Sixty and in the one hundred and Eighty Fourth year of the Sovereignty and Independence of the United States of America.

Signed, Sealed and Delivered }
in the presence of

Witnesses to the signing by George Taylor, Eloise Randell and

Bessie Goins

Bessie Goins
John Hall

George Taylor (L. S.)

Eloise Randell (L. S.)

Bessie Goins (L. S.)

Henry Taylor (L. S.)

Witnesses To the Signing by
Henry Taylor, Robbie Taylor
Mary Lee Taylor

Robbie Taylor (L.S.)
Robbie Taylor
Joe Taylor (L.S.)
Joe Taylor

Edward S. Anderson
NOTARY PUBLIC, CHATTHAM COUNTY, GEORGIA
BY COMMISSION EXPIRES MAY 28 1960

Georgia Wiggins (L.S.)
Georgia Wiggins

Witnesses to the signing by
Joe Taylor and Georgia Wiggins

Charles E. Washington Jr.

X STATE OF NEW YORK
COUNTY OF New York

Personally appeared before me Sarah Daudy & John Hall and made oath that they saw the within named grantors George Taylor, Eloise Randell and Bessie Goins sign, and seal and as their act and deed deliver the within written deed, and that they with Jacob Rosenzweig witnessed the execution thereof.

Sworn to before me this 11th day of May, A.D. 1960
Jacob Rosenzweig (Seal)

Sarah Daudy

JACOB ROSENZWIG, NOTARY PUBLIC
State of New York, # 03-8661000
Qualified in Bronx County
Cert. filed in N. Y. County
Commission Expires March 30, 1972.

GEORGIA
THE STATE OF ~~NEW YORK~~
CHATHAM County

PERSONALLY appeared before me Mary Lee Taylor and made oath that she saw the within named Henry Taylor and Robbie Taylor sign, seal, and as their act and deed, deliver the within written Deed; and that she with Edward S Anderson witnessed the execution thereof.

SWORN to before me, this 20th day of June, A.D. 1960

Mary Lee Taylor

(SEAL)
Stacy Boyerson (Notary State of Ga)

THE STATE OF SOUTH CAROLINA
COUNTY OF BERKLEY
PERSONALLY appeared before me Alphonis W Pendergrass and made oath that he saw the within named Joe Taylor and Georgia Wiggins sign, seal, and as their act and deed, deliver the within written Deed; and that he with Charles E. Washington Jr. witnessed the execution thereof.

Sworn to before me this 10th day of June 1960
Charles E. Washington Jr.
NOTARY PUBLIC FOR SOUTH CAROLINA

Alphonis W Pendergrass

STATE OF GEORGIA
COUNTY OF CHATHAM

I, Stacy Boyerson, a Notary Public for the State of Georgia, do hereby certify unto all whom it may concern, that Mrs. Mary Lee Taylor, wife of the within named Henry Taylor, did this day appear before me, and upon being privately and separately examined by me, did declare that she does freely, voluntarily, and without any compulsion, dread or fear of any

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person or persons whomsoever, renounce, release, and forever relinquish unto James Taylor, his heirs and assigns, all her right, interest and estate, and also all her right and claim of Dower of, in or to all and singular the premises within mentioned and released.

GIVEN under my hand and seal this

Mary Taylor

20th day of June, 1960

Clayton G. ...
Notary Public for Georgia

CEW

State of South Carolina,

To

QUIT-CLAIM DEED

Filed 22nd day of JUNE A. D. 1960
at 11:30 o'clock A. M.
and recorded in Book 102
Page 152 Fee \$ 1.75
W. R. M. C. or Clerk-Court C. P. & G. S.
Beaufort County, S. C.

Recorded this 19 day
of _____ Page
in Book _____
Fee \$ _____
Auditor _____
County, S. C.

SAVING & INVESTMENT CO., CHARLOTTE, S. C. 76232

The State of South Carolina,
COUNTY OF BEAUFORT

KNOW ALL MEN BY THESE PRESENTS, That

FIRST BUILDERS CORPORATION, A corporation organized and existing under the law of the State of South Carolina -----

in the State aforesaid, for and in consideration of the sum of ELEVEN THOUSAND FIVE HUNDRED AND NO/100 (\$11,500.00) ----- Dollars

to it in hand paid at and before the sealing of these presents, by HUBERT E. LANIER ----- in the State aforesaid, for which (the receipt whereof is hereby acknowledged)

have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release, unto the said HUBERT E. LANIER, HIS HEIRS AND ASSIGNS FOREVER, the following described real estate, to-wit:

ALL that certain piece, parcel or lot of land with improvements thereon, situate, lying and being on Ladies Island, Beaufort County, South Carolina, and designated as Lot 3, in Block F of Bychwood Subdivision, on a plat made by J. C. Sammons, in July, 1954, and recorded in the office of the Clerk of Court for Beaufort County, South Carolina, in Book 9 of Plats at Page 37. Said lot may be more particularly bounded and described as follows: NORTH by Lot No. 2 in Block F of said Subdivision, and measuring thereon for a distance of Two Hundred (200') feet; EAST by Sams Point Road, and measuring thereon for a distance of Ninety-nine (99') feet; SOUTH by Lot No. 4 of Block F of said Subdivision, and measuring thereon for a distance of Two Hundred (200') feet; and WEST by a Fifteen Foot Service Lane, and measuring thereon for a distance of Ninety-nine (99') feet; all of which will be more fully shown by reference to an individual plat of said lot made by Hardwick F. Wilson, Jr. R. L. S., dated January 11, 1960.

909p 1390
300-9-49 (w/1/2 G)

4/100B

49246

1390

THE STATE OF SOUTH CAROLINA,

COUNTY OF BEAUFORT

55 1.30

TAX TITLE BY THE TREASURER

TO ALL WHOM THESE PRESENTS MAY CONCERN:

WHEREAS, the provisions of Title 12, Chapter 51, Section 10 through 170 of the South Carolina Code, 1976, as amended, entitled "Alternate procedure for Collection of Property Taxes," duly enacted by the General Assembly of the State of South Carolina, provide an additional method and alternate procedure for the collection, handling and distribution of delinquent property taxes, penalties and costs due to counties and other political subdivisions of the State; and

WHEREAS, the provisions of the aforesaid Title 12, Chapter 51, Sections 10 through 170, authorize the levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the taxes, penalties, costs and sale of property following proper advertisement of the property for sale; and

WHEREAS, I, JOY LOGAN, TREASURER OF BEAUFORT COUNTY, pursuant to the authority of the aforesaid provisions and amendments thereto, issued a warrant or execution in duplicate against Taylor, Phoebe, a defaulting taxpayer of said Beaufort County, to levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the 1994 (year) taxes and costs in the amount of \$ 152.94; and

WHEREAS, by virtue of said warrant or execution, Herschel J. Evans, Jr. (authorized officer) did on May 1, 1995 (date of certified mail notice of delinquent tax), under cover of "certified mail - return receipt requested, deliver to addressee only," mail notice to said delinquent taxpayer; and indicate whether or not received; and was received.

WHEREAS, (in the event the certified mail notice was returned), the officer authorized and directed to collect delinquent taxes, penalties and costs did, on N/A (date of posting of notice), take exclusive possession of the property against which such taxes were assessed by posting of a notice at one or more conspicuous places on the real premises hereinafter described, reading "seized by N/A (person officially charged with collection of delinquent taxes of Beaufort County) to be sold for delinquent taxes"; and

WHEREAS, Herschel J. Evans, Jr. (person officially charged with the collection for delinquent taxes) did thereafter properly advertise the property for sale once a week for three successive weeks for sale in September 1995 (month/year); and

Dist.	Map	Section	Page
300	9		49

WHEREAS, upon the failure of the delinquent taxpayer, or anyone acting in his behalf, to pay the taxes, penalties and costs, the property described hereinafter was duly sold at public auction on the sales day of the month of October in the year 1995 during the usual hours of sale, to James J. Taylor (purchaser), the purchaser and the highest bidder at such sale for the sum of (\$ 258.43), and furnished the purchaser a receipt for such purchase money and annexed such receipt to the duplicate warrant for the endorsement thereon of his actions thereunder; and

WHEREAS, under cover of certified mail, return receipt requested, deliver to addressee only, Herschel J. Evans, Jr. (person officially charged with the collection of delinquent taxes) did, on August 30, 1996 (date) mail to the owner of record on February 1, 1996 (year of expiration of redemption period) a Notice addressed to Taylor, Pheobe (owner of record on February 1, immediately preceding the end of the redemption period) that the property described on the Notice had been sold for taxes and advising said owner if not redeemed by paying taxes, penalties, costs and interest in the amount of \$ 279.10 on or before October 2, 1996 (twelve months from date of sale) a tax title would be issued to the successful purchaser at the tax sale; and was not redeemed; and

WHEREAS, twelve months have elapsed since the date of sale for delinquent taxes, and the said Taylor, Pheobe (defaulting taxpayer) or other parties interested after due notice have failed to redeem said lands so sold.

NOW THEREFORE, I, JOY LOGAN, TREASURER OF THE COUNTY OF BEAUFORT, in consideration of the premises, and the sum of (\$ 258.43) to me by the said James J. Taylor have granted, bargained, sold and released, and by these presents do grant, bargain, sell and release unto the said James J. Taylor;

All that certain piece, parcel or lot of land, situate, lying and being in the St. Helena Island District, containing 1.3 acre in Beaufort County, South Carolina, and being the Western portion of Parcel 6, bounded on the North by marsh, on the East by the remainder of Parcel 6, Pheobe Taylor, on the South by highway, and on the West by Geneva & Rufus Taylor, Parcel 36.

This is the same lot of land sold at the Delinquent Tax Sale of
(Month/Day) October 2, _____, 19 95, for delinquent
taxes in the name of Taylor, Pheobe
(District 300, Map 9, Submap _____)
(Parcel 6, Block T95)

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

TO HAVE AND TO HOLD all and singular the premises hereby granted, and with the appurtenances, unto the said James J. Taylor, heirs and assigns forever, according the form, force and effect of the laws and usages of the State of South Carolina, in such cases made and provided.

WITNESS my Hand and Seal this 18th day of December, in the year of our Lord One Thousand Nine Hundred and Ninety - six and in the 120 year of Independence of the United States of America.

Signed, Sealed and Delivered in the Presence of:

Candace O. Harvey
Alicia M. Hollingsworth

Joy Logan
JOY LOGAN
TREASURER OF BEAUFORT COUNTY

State of South Carolina)
County of BEAUFORT)

Probate

Personally appeared before me Candace O. Harvey who, being duly sworn, deposed and said that (s)he saw the within named Joy Logan as Treasurer of Beaufort County sign, seal and deliver the within deed, and that (s)he, together with Alicia M. Hollingsworth, Candace O. Harvey witnessed the execution thereof.

SWORN to and subscribed before me

this 19th day of December, 19 96
Alicia M. Hollingsworth (SEAL)

Notary Public for South Carolina

My commission expires: My Commission Expires March 29, 2007

The State of South Carolina,

DEED

TREASURER OF BEAUFORT COUNTY

TO

James J. Taylor

141 Gardner Drive

St. Helena Island, SC 29920

Filed _____ day

of _____ A.D. 19 _____

at _____ o'clock _____ M.

and recorded in Book _____

Page _____ Fee, \$ _____

R.M.C. or Clerk Court C.P. & G.S.
Beaufort County, S.C.

Recorded this _____ day

of _____, 19 _____

in Book _____ Page _____

Fee, \$ _____

Auditor, Beaufort County S.C.

RECORDED THIS 14TH DAY
OF JANUARY 1977
IN BOOK 909 PAGE 1501
Marie B. Stewart
AUDITOR, BEAUFORT COUNTY, S.C.

REC'D
53 DEC 20 AM 8:54
SERIAL 1436
COUNTY, S.C.
909 PG 1390
FOLDER #
MLL

1390

Stowers Office

Plaintiff's Exhibit 10

2/10/98

58979

RECEIVED 11/10/97
COUNTY S. 52 TAXES 130
300-9-6 (E) 1/2
TAX TITLE BY THE TREASURER

THE STATE OF SOUTH CAROLINA,
COUNTY OF BEAUFORT

TO ALL WHOM THESE PRESENTS MAY CONCERN:

WHEREAS, the provisions of Title 12, Chapter 51, Section 10 through 170 of the South Carolina Code, 1976, as amended, entitled "Alternate procedure for Collection of Property Taxes," duly enacted by the General Assembly of the State of South Carolina, provide an additional method and alternate procedure for the collection, handling and distribution of delinquent property taxes, penalties and costs due to counties and other political subdivisions of the State; and

WHEREAS, the provisions of the aforesaid Title 12, Chapter 51, Sections 10 through 170, authorize the levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the taxes, penalties, costs and sale of property following proper advertisement of the property for sale; and

WHEREAS, I, JOY LOGAN, TREASURER OF BEAUFORT COUNTY, pursuant to the authority of the aforesaid provisions and amendments thereto, issued a warrant or execution in duplicate against Pheobe Taylor, (a defaulting taxpayer of said Beaufort County), to levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the 1996 taxes and costs in the amount of \$169.59; and

WHEREAS, by virtue of said warrant or execution, Herschel J. Evans, Jr., (authorized officer) did on May 1, 1997 (date of certified mail notice of delinquent tax), under cover of "certified mail - return receipt requested, deliver to addressee only," mail notice to said delinquent taxpayer; and indicated whether or not received; and was received

WHEREAS, (in the event the certified mail notice was returned), the officer authorized and directed to collect delinquent taxes, penalties and costs, did on N/A (date of posting of notice), take exclusive possession of the property against which such taxes were assessed by posting of a notice at one or more conspicuous places on the real premises hereinafter described, reading "seized by N/A (person officially charged with collection of delinquent taxes of Beaufort County) to be sold for delinquent taxes"; and

WHEREAS, Herschel J. Evans, Jr., (person officially charged with the collection of delinquent taxes) did thereafter properly advertise the property for sale once a week for three successive weeks for sale in October - 1997 (month/year); and

R 300-9-6-0 I

WHEREAS, upon the failure of the delinquent taxpayer, or anyone acting in his behalf, to pay the taxes, penalties and costs, the property described hereinafter was duly sold at public auction on the sales day of the month of October in the year 1997 during the usual hours of sale to James J. Taylor at such sale for the sum of \$295.00, and furnished the purchaser a receipt of such purchase money and annexed such receipt to the duplicate warrant for the endorsement thereon of his actions thereunder; and

WHEREAS, under cover of certified mail, return receipt requested, deliver to addressee only, Herschel J. Evans, Jr., (person charged with the collection of delinquent taxes) did on September 1, 1998 (date) mail to the owner of record on February 1, 1998 (year of expiration of redemption period) a Notice addressed to Pheobe Taylor (owner of record on February 1, immediately preceding the end of the redemption period) that the property described on the Notice had been sold for taxes and advising said owner if not redeemed by paying taxes, penalties, costs and interests in the amount of \$297.66 on or before October 6, 1998, (twelve months from date of sale) a tax title would be issued to the successful purchaser at the tax sale; and was not redeemed; and

WHEREAS, twelve months have elapsed since the date of sale for delinquent taxes, and the said Pheobe Taylor (defaulting taxpayer) or other parties interested after due notice have failed to redeem said lands so sold.

NOW, I, JOY LOGAN, TREASURER OF THE COUNTY OF BEAUFORT, in consideration of the premises, and the sum of \$295.00 to me by the said James J. Taylor have granted, bargained, sold and released, and by these presents do grant, bargain, sell and release unto the said James J. Taylor.

All that certain piece, parcel, or lot of land, situate, lying and being on St. Helena Island, in Beaufort County, South Carolina containing 1.3 acres and being bordered on the North by marshes of Lucy Creek, on the East by lands of James Taylor, on the South by a roadway and on the West by lands of James Taylor. This being the the Eastern half of Parcel 6, and the remaining 1.3 acres of the original 2.6 acre tract, which was sold previously at tax sale.

This is the same lot of land sold at the Delinquent Tax Sale of October 6, 1997, for delinquent taxes in the name of Pheobe Taylor.

District: 300 Map: 9 S/Map

Parcel: 6 Block: T97

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

TO HAVE AND TO HOLD all and singular the premises hereby granted, and with the appurtenances, unto the said James J. Taylor, heirs and assigns forever, according the form, force and effect of the laws and usages of the State of South Carolina, in such cases made and provided.

WITNESS my Hand and Seal this 18th day of November, in the year of our Lord One Thousand Nine Hundred and Ninety eight and in the 22nd year of Independence of the United States of America.

Signed, Sealed and Delivered in the Presence of:

Candace O. Harvey
Amie Drough

Joy Logan
JOY LOGAN
TREASURER OF BEAUFORT COUNTY

State of South Carolina)

County of BEAUFORT

Probate

Personally appeared before me Candace O. Harvey who, being duly

sworn, deposed and said that (s)he saw the within named Joy Logan as Treasurer of Beaufort County sign, seal and deliver the within deed, and that (s)he, together with Amie Drough witnessed the execution thereof.

SWORN to and subscribed before me

this 18th day of

November, 19 98

Candace O. Harvey (SEAL)

Notary Public for South Carolina

My Commission expires: MY COMMISSION EXPIRES MARCH 20, 2005

The State of South Carolina,

DEED

TREASURER OF BEAUFORT COUNTY

TO

James L. Taylor

141 Gardner Lane

St. Helena Island, SC 29920

Filed _____ day

of _____ A.D. 19 _____

at _____ o'clock _____ M.

and recorded in Book _____

Page _____ Fee, \$ _____

R.M.C. or Clerk Court C.P. & G.S.
Beaufort County, S.C.

Recorded this _____ day

of _____, 19 _____

in Book _____ Page _____

Fee, \$ _____

Auditor, Beaufort County S.C.

RECORDED THIS 6th DAY
OF January 19 99
IN BOOK AE PAGE 2535
Sharon Q. Summey
AUDITOR, BEAUFORT COUNTY, S.C.

~~FILED
GENERAL REG
NOV 19 11:53
EN FOLDER# PG~~
1998/05/23 PM 5:00
238
110
EN FOLDER# PG 17

BOOK 53

THE STATE OF SOUTH CAROLINA,

Whereas Ben Taylor, deceased, late of Wassa Island in the County of Beaufort in the State aforesaid, died intestate, was possessed of five (5) acres of land, leaving no issue and as his only heir at law, his wife Josephine Taylor, now Black, therefore

KNOW ALL MEN BY THESE PRESENTS, That I the said Josephine Taylor, now Black, of Frogmore, County of Beaufort

in the State aforesaid for and in consideration of the sum of forty (\$40.00) Dollars to me and for the use and behoof of the said Phoebe Taylor of Wassa Island, Frogmore, in the State aforesaid. This receipt whereof is hereby acknowledged, have granted, bargained, sold, released, and by these Presents do grant, bargain, sell and release unto the said Phoebe Taylor, all of that certain piece, parcel or lot of land, situate, lying and being on Wassa Island in the County and State aforesaid, being bounded on the north by lands now or formerly of Estate of Sam Matting, on the east by lands now or formerly of George Taylor, on the south by lands now or formerly of Estate Ben Gardner, and on the west by lands now or formerly of Estate of William Taylor, the tract hereby being conveyed originally contained five (5) acres but, on account of constant erosions, is now considered to be four (4) acres, more or less, and is the same tract inherited from my first husband, Ben Taylor, deceased.

Plaintiff's Exhibit 11

TOGETHER with, all and singular, the rights, members, hereditaments and 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 Phoebe Taylor, her Heirs and Assigns forever

AND, I do hereby and myself and my Heirs, Executors and Administrators, do warrant, defend, all and singular, the said premises unto the said Phoebe Taylor, her Heirs and Assigns against me and my Heirs and against every person whomsoever lawfully claiming or to claim the same, or any part thereof

WITNESS MY Hand and Seal, this twenty second day of July in the year of our Lord one thousand nine hundred and thirty seven and of the Independence of the United States of America

Signed, Sealed and Delivered in the Presence of: John B. Thomas, Josephine Black, Sam McGowan

THE STATE OF SOUTH CAROLINA, Beaufort County. Personally appeared before me John B. Thomas and made oath that he saw the within named Josephine Black her husband and deed, deliver the within written Deed, and that he and Sam McGowan witness the execution thereof. SWORN to before me this 21st day of July A D 1937 John B. Thomas (Seal) M.B. Batchelder (L.S.) Notary Public, of S.C.

THE STATE OF SOUTH CAROLINA, Beaufort County. I, Notary Public, do hereby certify that the foregoing is a true and correct copy of the original of the within named deed as the same appears in my files and records. It may concern that Mrs. Josephine Taylor, wife of the within named Phoebe Taylor, did this day appear before me, and upon being privately examined by me, did declare that she does not, and never will, execute any deed or conveyance in any manner whatsoever, renounce, release and convey or relinquish unto the within named Phoebe Taylor, her Heirs and Assigns, all her interest and estate and also a Fourteenth and thirteenth of Dowry of, or in, or to, all and singular the premises within mentioned and released. Given under my hand and seal, this day of July A D 1937

Recorded and certified, this 5th day of August 1938. M. B. Batchelder Deputy

JR 102178

IN THE COURT OF COMMON PLEAS

CASE NO.: 95-CP-07-1784

STATE OF SOUTH CAROLINA)

COUNTY OF BEAUFORT)

ISAAC TAYLOR, REBECCA TAYLOR,)
AND WALTER TAYLOR,)

Plaintiffs,)

vs.)

THE HEIRS OF RUFUS TAYLOR,)
THE HEIRS OF GENEVA TAYLOR,)
THE HEIRS OF WILLIAM TAYLOR,)
ALBERTHA GOODWINE, PHOEBE)
TAYLOR, JAMES TAYLOR, GEORGE)
PECOLA KNOWLES, FRANKLIN)
HEYWARD, THE HEIRS OF JOSEPH)
GARDNER, ALBERTHA LADSON,)
LILLIAN B. MATTIS, JOHN MATTIS,)
JR., GERLENE MATTIS, PAUL)
MATTIS, CHARLES W. GARDNER,)
LINDA H. JOHNSON, NATHAN)
TAYLOR, HAROLD B. CHISHOLM,)
BEATRICE B. CAPERS, ETHYLN)
JACKSON, JOHN J. BOUQUET, THE)
HEIRS OF NED MAJOR, ISAAH)
MAJOR, FREDERICKA TAYLOR;)
IF ANY OF THESE PERSONS ARE)
LIVING, AND IF NOT LIVING, THEN)
THE HEIRS, DEVISEES OR)
SUCCESSORS IN TITLE TO THEM;)
AND ALL PERSONS UNKNOWN)
HAVING OR CLAIMING TO HAVE)
ANY RIGHT, TITLE, INTEREST IN)
OR LIEN UPON THE REAL)
PROPERTY DESCRIBED IN THE)
COMPLAINT HEREIN BEING)
DESIGNATED COLLECTIVELY AS)
JOHN DOE AND MARY ROE;)
INCLUDING ALL PERSONS WHO)
MAY BE DECEASED, MINORS, IN)
THE ARMED FORCES OF THE)
UNITED STATES, NON COMPOS)
MENTIS OR UNDER ANY OTHER)
DISABILITY,)

Defendants.)

copy

BEAUFORT COUNTY
CLERK OF COURT
BEAUFORT, S.C.

97 FEB 28 AM 9 35

ORDER QUIETING AND
CONFIRMING TITLE

(includes 2 plats)

Plaintiff's Exhibit 12

T/1/02

This is an action to quiet and confirm title to two (2) parcels of real estate located in Beaufort County, South Carolina. This action was commenced by the filing of a Summons and Complaint in the Beaufort County Court of Common Pleas on November 8, 1996. Attached to the Complaint, as exhibits, are plats of the two (2) subject parcels of real property.

On November 8, 1996, a Petition seeking the appointment of a Guardian ad Litem was filed, and on November 15, 1996 an Order was filed appointing Melanie A. Joseph, Esquire, as the Guardian ad Litem for John Doe and Mary Roe, and all unknown persons with an interest in the subject properties, minor heirs, and persons under disability or in the military service.

A Petition for Order of Publication was filed on November 14, 1996 and an Order for Publication was filed on that same date. Service by publication was effectuated pursuant to said Order by publication of the Summons in the Beaufort Gazette, a newspaper published in the City of Beaufort, County of Beaufort, State of South Carolina, on December 9, 16, and 23, 1996, as evidenced by the Affidavit of Service filed on January 23, 1997.

On November 18, 1996, a copy of the Summons and Complaint, Petition for Appointment of Guardian ad Litem, Order for Guardian ad Litem, Answer of Guardian ad Litem, Petition for Order of Publication, and Order for Publication, as well as an Acceptance of Service form, was mailed to each of the named living Defendants, except Fredericka Taylor, via United States Postal Service by Certified Mail-Return Receipt Requested, as evidenced by the Affidavits of Service filed on January 14, 1997. The Return Receipts were signed by or on behalf of George and Pecola Knowles, Charles Gardner, Albertha Ladson, Gerlene Mattis, John Mattis, Jr., Lillian B. Mattis, and Paul Mattis on November 20, 1996; by or on behalf of James Taylor and Phoebe Taylor on November 21, 1996; by or on behalf of Albertha Goodwin, and Nathan Taylor on November 22, 1996; and by or on behalf of Beatrice Capers and Harold Chisholm on November 26, 1996. Additionally, Acceptances of

TLC m

Services were signed by Albertha Ladson on November 29, 1996, by George and Pecola Knowles on December 2, 1996, by Nathan Taylor on December 5, 1996, by John J. Bouquet on December 9, 1996 and by Fredericka Taylor on January 3, 1997.

The Guardian ad Litem filed her Answer on November 18, 1996. George and Pecola Knowles, through their attorney W. Brantley Harvey, Jr., Esquire, filed their Answer on December 2, 1996. Beatrice Capers, Harold Chisholm, and Ethlyn Jackson, through their attorney Bernard McIntyre, Esquire, filed their Answer on December 19, 1996. Additionally, through correspondence, Gerlene Mattis, John Mattis, Jr., Lillian B. Mattis, and Paul Mattis entered an appearance through their attorney J. Thomas Mikell, Esquire and Nathan Taylor entered an appearance through his attorney, George R. Wiggs, Esquire.

The only named living Defendant who was not served was Isaiah Major, who is referenced in the Complaint as an adjoining landowner, but who in fact owns property across a public road from one of the subject parcels. I find he is not a necessary party to this action.

This matter came to be heard before me for the purpose of conducting a final hearing in the Beaufort County Court of Common Pleas on February 20, 1997. Each of the Plaintiffs was present and were represented by their attorney, H. Fred Kuhn, Jr., Esquire. Also present was Bernard McIntyre, Esquire, appearing on behalf of his clients, Beatrice Capers, Harold Chisholm, and Ethlyn Jackson. Several other parties and witnesses were present, including, but not limited to, Albertha Goodwine, Linda H. Johnson, and Lillian B. Mattis.

Testimony was taken and various documents were introduced into evidence. Pursuant to the testimony and documentary evidence introduced I make the following Findings of Fact.

FINDINGS OF FACT

1. This is an action to quiet and clear title to two (2) parcels of real property which are

situate, lying, and being in the County of Beaufort in the State of South Carolina.

2. Rufus Taylor died intestate in 1964
3. At the time of his death, Rufus Taylor was a citizen and resident of Beaufort County, South Carolina
4. At the time of his death, Rufus Taylor was seized and possessed of clear, legal, and marketable title in and to the following parcels of real property, to wit:

PARCEL A

ALL that certain piece, parcel or lot of land situate, lying and being on Warsaw Island in Beaufort County, South Carolina consisting of 7.862 acres, more or less, which is bisected by Warsaw Island Road with 5.789 acres lying north of said road and 2.073 acres lying south of said road, all as is more fully shown and described on that plat prepared for the Heirs of Rufus and Geneva Taylor dated July 29, 1996 prepared by David S. Youmans, R.L.S. #9765, a copy of which is attached to this Order and incorporated herein by reference.

PARCEL B

ALL that certain piece, parcel or lot of land situate, lying and being on Warsaw Island in Beaufort County, South Carolina consisting of 1.9355 acres, more or less, as is more fully shown and described on that plat prepared for Rufus Taylor and Geneva Taylor dated July 30, 1996 and prepared by Robert D. Trogdon, IV, R.L.S. #14819, a copy of which is attached to this Order and incorporated herein by reference.

5. Rufus Taylor left as his sole surviving heirs at law his wife and his children, Isaac Taylor, Rebecca Taylor, and Walter Taylor. His wife subsequently died intestate leaving as her sole surviving heirs at law the same children, being Isaac Taylor, Rebecca Taylor and Walter Taylor.

6. The Plaintiffs have no claim of title or ownership interest in that 3.36 acre Island as shown on a plat prepared for the Heirs of Eleazar Black recorded in the Office of the Clerk of Court for Beaufort County, in Plat Book 34 at Page 82 on December 12, 1986, which is the subject of a prior quiet title action filed in Beaufort County Judgment Roll No. 65109.

Pursuant to the foregoing Findings of Fact I make the following Conclusions of Law.

CONCLUSIONS OF LAW

1. This Court has jurisdiction and venue in this matter.
2. Pursuant to the South Carolina Statutes of Devise and Decent, Isaac Taylor, Rebecca Taylor and Walter Taylor are each seized and possessed of an undivided one-third (1/3) interest in and to each of the subject parcels of real property.

IT IS, THEREFORE, ORDERED that Isaac Taylor, Rebecca Taylor, and Walter Taylor are the owners, in fee simple absolute, and are seized and possessed of clear, legal, and marketable title in and to the following parcels of real property, to wit:

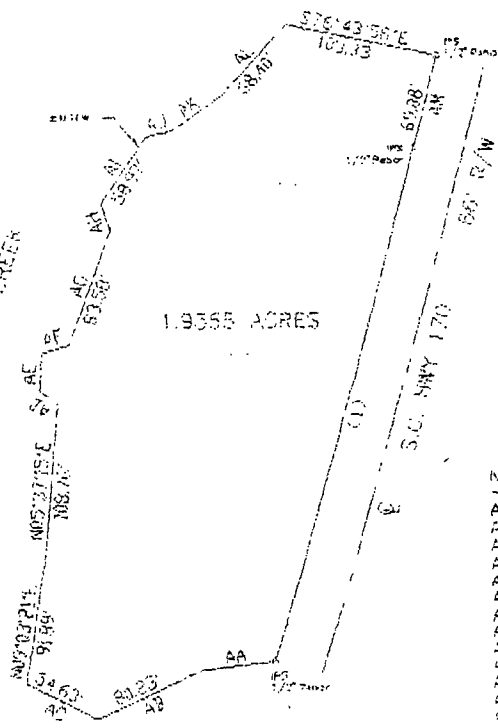
PARCEL A

ALL that certain piece, parcel or lot of land situate, lying and being on Warsaw Island in Beaufort County, South Carolina consisting of 7.862 acres, more or less, which is bisected by Warsaw Island Road with 5.789 acres lying north of said road and 2.073 acres lying south of said road, all as is more fully shown and described on that plat prepared for the Heirs of Rufus and Geneva Taylor dated July 29, 1996 prepared by David S. Youmans, R.L.S. #9765, a copy of which is attached to this Order and incorporated herein by reference.

PARCEL B

ALL that certain piece, parcel or lot of land situate, lying and being on Warsaw Island in Beaufort County, South Carolina consisting of 1.9355 acres, more or less, as is more fully shown and described on that plat prepared for Rufus Taylor and Geneva Taylor dated July 30, 1996 and prepared by Robert D. Trogdon, IV, R.L.S. #14819, a copy of which is attached to this Order and incorporated herein by reference.

The said Isaac Taylor, Rebecca Taylor, and Walter Taylor hold title to the foregoing two (2) parcels of real property as tenants in common, each possessing an undivided one-third (1/3) interest in the whole, and the interest of any and all other persons claiming any right, title, interest or estate, or lien upon, the above described parcels A and B shall be and are hereby forever barred.

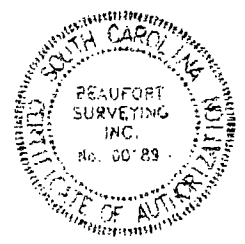


NO	BEARING	DISTANCE
AA	S82°26'51"W	49.95'
AD	S65°03'54"W	80.23'
AC	N62°44'09"W	54.83'
AB	N51°14'18"W	16.11'
AP	N03°31'50"E	25.96'
AF	N72°54'44"E	39.32'
AG	N20°08'56"E	23.58'
AH	N18°37'42"E	20.05'
AI	N32°06'15"E	58.93'
AJ	N77°56'11"E	18.42'
AK	N53°37'28"E	43.64'
AL	N40°26'14"E	63.47'
AM	S13°14'19"W	69.08'

NO.	BETA	RADIUS	ARC TANGENT	C BEARING	CHORD
1	3°30'45"	615934'	377.25'	S14°59'48"W	377.20'

BOUNDARY SURVEY PREPARED FOR
RUFUS TAYLOR & GENEVA TAYLOR

A PORTION OF WARSAW ISLAND
ST. HELENA ISLAND
BEAUFORT COUNTY SOUTH CAROLINA



I HEREBY STATE THAT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF, THE SURVEY SHOWN HEREON 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 B SURVEY AS SPECIFIED THEREIN; ALSO THERE ARE NO VISIBLE ENCROACHMENTS OR PROJECTIONS OTHER THAN SHOWN.

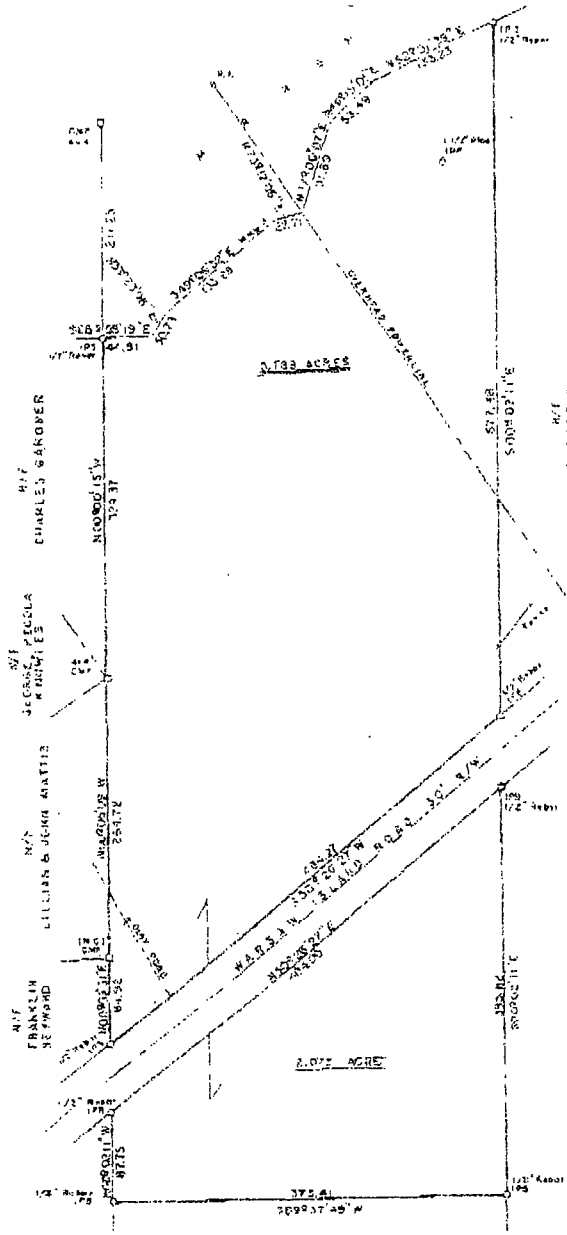
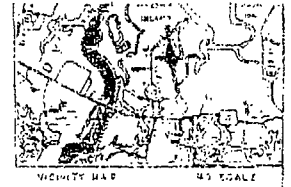
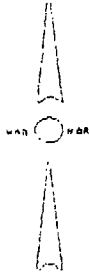
THIS PROPERTY IS LOCATED IN ZONE A-10 (ELEV. 13.00) AS DETERMINED BY FEMA, FIRM COMMUNITY-PANEL NUMBER 430025 0100 D, DATED 2/29/86.

PIN: R300-015-000-017A-0000



SCALE 1" = 100'
JULY 30, 1988

Robert D. Traggdon IV
ROBERT D. TRAGGDON IV RLS 14819
BEAUFORT SURVEYING, INC.
1925 DUKE STREET (PO BOX 1231)
BEAUFORT, S.C. 29901
PHONE (803) 524-3261 441-1175



5.733 ACRES
 2.072 ACRES
 7.805 ACRES TOTAL

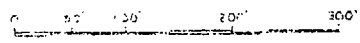
BOUNDARY SURVEY PREPARED FOR
 BEING OF RUFUS & GENEVA TAYLOR

A PORTION OF LOT 7 AS SHOWN ON A PLAT BY H. G.
 JUED, DATED MAY 1886.

REFERENCE PLAT: PLAT BY NYELS CHRISTENSEN, DATED
 FEBRUARY 27, 1974, REVISED OCTOBER 1, 1974,
 RECORDED IN PLAT BOOK 23, PAGE 13.

THIS PROPERTY IS LOCATED IN ZONE A-10, (RELEV.
 13.00) AS DETERMINED BY FEMA, FIRM COMMUNITY-
 PLANED NUMBER 150025 0100 D, DATED 9/29/86.

FILE: R100-009-000-0016-0000



SCALE 1" = 100' JULY 20, 1986

REVISION - OCTOBER 3, 1986
 ADDED PARCEL SOUTH OF ROAD

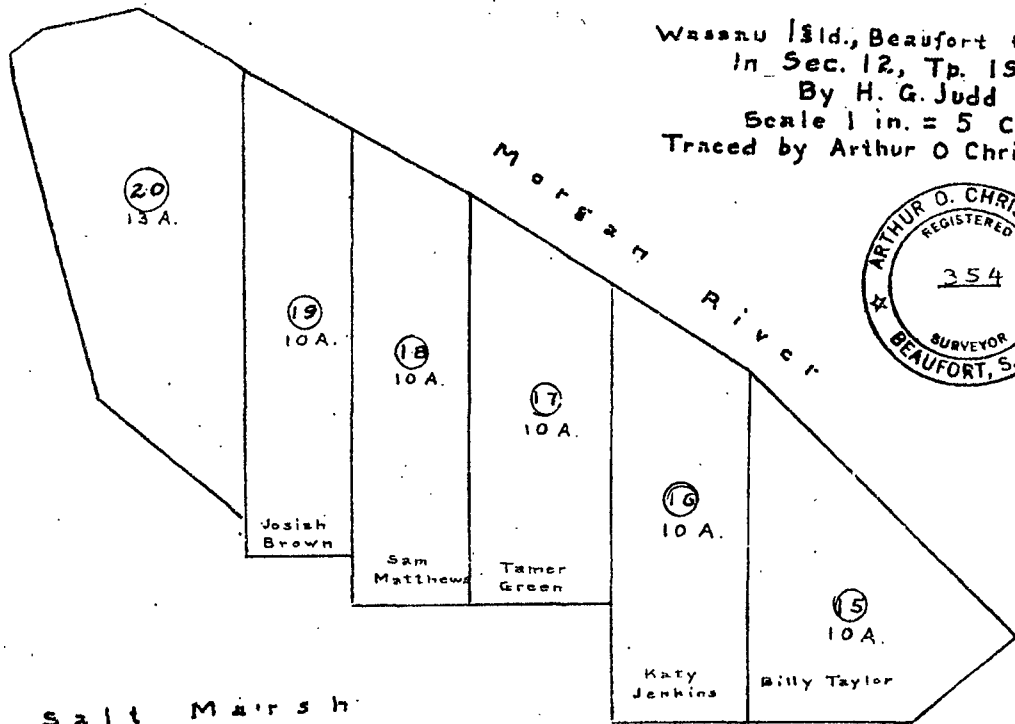


I HEREBY STATE THAT TO THE BEST OF
 MY KNOWLEDGE, INFORMATION AND BELIEF,
 THE SURVEY SHOWN HEREON WAS MADE IN
 ACCORDANCE WITH THE REQUIREMENTS OF
 THE MANNING STANDARDS MANUAL FOR THE
 PRACTICE OF LAND SURVEYING IN SOUTH
 CAROLINA, AND MEETS OR EXCEEDS THE
 REQUIREMENTS FOR A CLASS B SURVEY AS
 SPECIFIED THEREIN; ALSO THERE ARE NO
 VISIBLE ENCROACHMENTS OR OBJECTIONS
 OTHER THAN SHOWN.

David M. Youmans
 DAVID M. YOUNG, R.L.S. 3743
 BEAUFORT SURVEYING, INC.
 128 DUKE STREET, P.O. BOX 221,
 BEAUFORT, SOUTH CAROLINA 29516

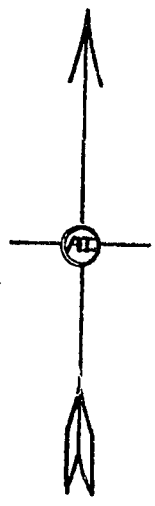
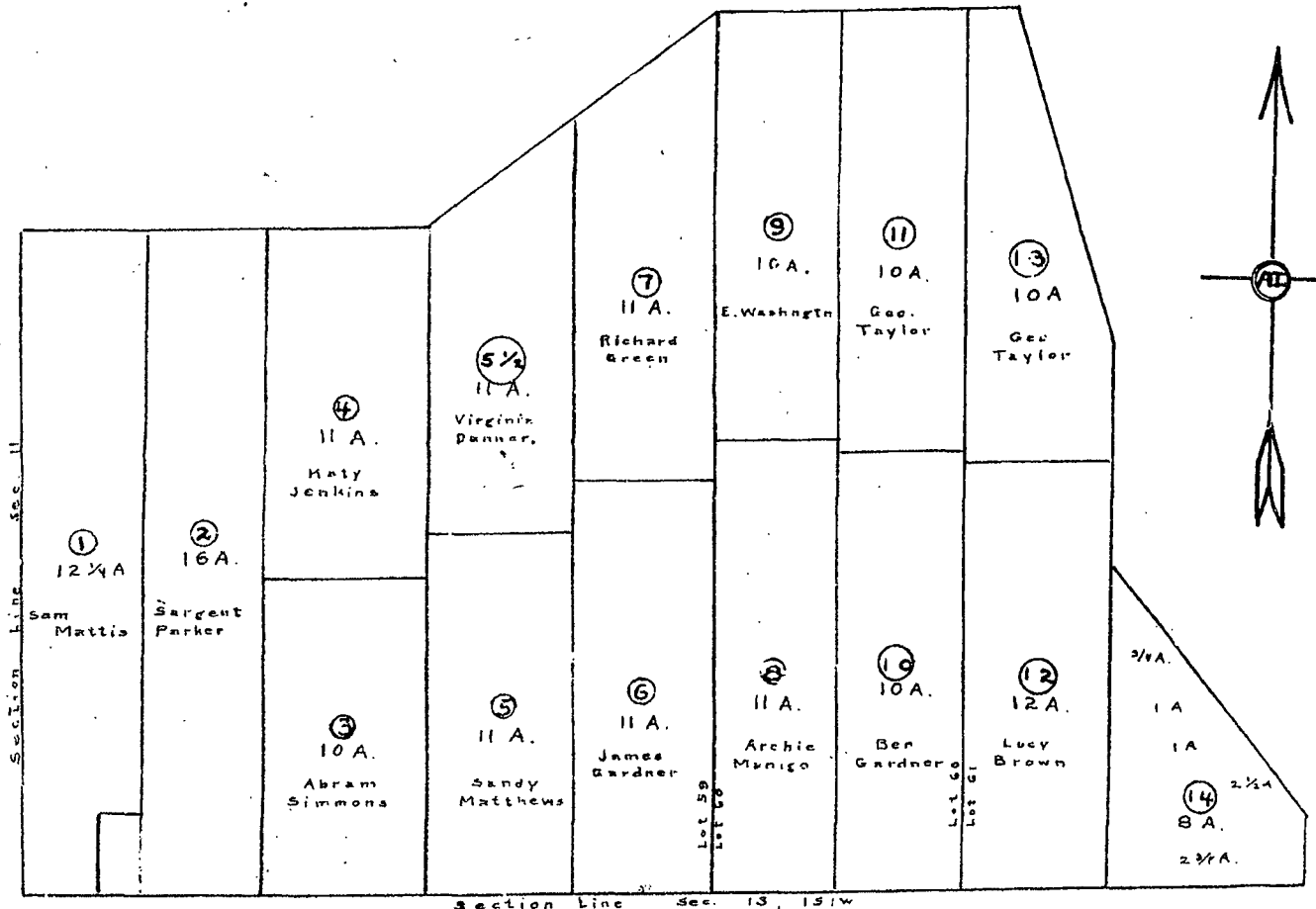
AOC Map 23

Wassau Ild., Beaufort Co., S. C.
 In Sec. 12, Tp. 151W
 By H. G. Judd
 Scale 1 in. = 5 Chs.
 Traced by Arthur O Christensen



Salt Marsh

- Lot 20 divided into 13 parts
 2 belong to A. Manigo
 13 equilly shared among the 13 others
 Begining at the S end
- 1 Sargent Parker
 - 2 A. Manigo
 - 3 Sandy Matthews
 - 4 Virginia Danner
 - 5 James Gardner
 - 6 Richard Green
 - 7 A. Manigo
 - 8 E. Washington
 - 9 Ben Gardner
 - 10 Geo. Taylor
 - 11 Lucy Brown
 - 12 Billy Taylor
 - 13 Katy Jenkins
 - 14 Tamer Green
 - 15 Josiah Brown



Section Line Sec. 13, 151W



This Deed was prepared by the law firm of Moss & Kuhn, P.A., 1501 North Street, P.O. Drawer 507, Beaufort, South Carolina 29901 (HFK,Jr).

TMS # R300-009-000-0036-_____

Together with all and singular the rights, members, hereditaments and 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 **GEORGIA CHAMPION**, her heirs and assigns, forever.

AND, the said **ISAAC TAYLOR, REBECCA TAYLOR and WALTER TAYLOR** do hereby bind themselves and their Heirs, Assigns, Executors, Administrators and Personal Representatives, to warrant and forever defend, all and singular, the said Premises unto the said **GEORGIA CHAMPION**, her heirs and assigns, against us and our Heirs, and all persons whomsoever lawfully claiming or to claim the same, or any part thereof.

IN WITNESS WHEREOF ISAAC TAYLOR, REBECCA TAYLOR and
WALTER TAYLOR have set forth their Hands and Seals this 5th day of February in
the year of our Lord one thousand nine hundred and ninety-eight.

Signed, Sealed and Delivered)
In The Presence Of)

Alberta Goodwine
Witness (Non-notary)

ISAAC TAYLOR
ISAAC TAYLOR

[Signature]
Witness (Notary)

REBECCA TAYLOR
REBECCA TAYLOR

WALTER TAYLOR
WALTER TAYLOR

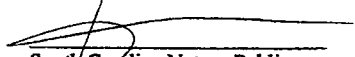
The State of South Carolina)
County of Beaufort)

PERSONALLY appeared before me the above first-signed witness who, on oath,
says that s/he saw the within named ISAAC TAYLOR, REBECCA TAYLOR and
WALTER TAYLOR, as their act and deed, sign and deliver the within written Deed, and
that s/he with the above second-signed witness, a notary public, witnessed the execution
thereof.

Alberta Goodwine
Witness (Non-notary)

SWORN to before me this

5th day of February, 1998.



South Carolina Notary Public
My Commission expires: 10-12-2000

RECORDING INFORMATION

Filed this ____ day of _____, 1998 at _____ o'clock and
recorded in Deed Book ____ at Page _____.

Beaufort County Register of Deeds

Recorded this ____ day of _____, 1997 in Book ____ at Page _____.

Beaufort County Auditor's Office

9292 Moss

571

FILED
JOHN A. SULLIVAN - RMC
BEAUFORT COUNTY, S.C.

98 APR 17 PM 3:53

Bk 1034 PG 567
FOLDER#

RECORDED THIS 13 DAY
OF May 19 98
IN BOOK AE PAGE 445

Sharon P. Burris
AUDITOR, BEAUFORT COUNTY, S.C.

12/5
85

26114

1296 p 8

STATE OF SOUTH CAROLINA
COUNTY OF

PROBATE COURT

IN THE MATTER OF Estate of James Josephus Taylor
CASE NUMBER 99ES0700290

DEED OF DISTRIBUTION

WHEREAS, the decedent died on the 6 day of March, 1999 and,

WHEREAS, the estate of the decedent is being administered in the Probate Court for Beaufort County, South Carolina in File # 99ES0700290, and,

WHEREAS, the grantee herein is either a beneficiary or heir at law, as appropriate, of the decedent; and,

WHEREAS, the undersigned Personal Representative is the duly appointed and qualified fiduciary in this matter; and,

NOW, THEREFORE, in accordance with the laws of the State of South Carolina, the Personal Representative has granted bargained, sold and released, and by these Presents does grant, bargain, sell and release to:

Name:	<u>Maetta Bizzo</u>	<u>Stanley Taylor</u>	<u>JOE A Taylor</u>
Address:	<u>141 Gardner Drive</u>	<u>4530 Peru Drive</u>	<u>659 Magnolia Blvd</u>
	<u>St. Helens Island</u>	<u>Columbus GA. 31907</u>	<u>Fort. Washington, Lewis</u>
	<u>SC. 29920</u>		<u>98433</u>

the following described property: Please see Attached deeds

Plaintiff's Exhibit 18

R 300-9-6⁵⁵
+
49

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises/Property belonging, or in anywise incident or appertaining.

TO HAVE AND TO HOLD, all and singular, the said Premises/Property unto the said Martha Brown,
Stacy Taylor, Joe A. Taylor
their heirs and assigns forever.

IN WITNESS WHEREOF, the undersigned, as Personal Representative of the estate of the decedent, has executed this Deed, this 26 day of May 2000

SIGNED, SEALED AND DELIVERED Estate of: Estate of James Josephus Taylor
IN THE PRESENCE OF by Signature: Maxine J...

Witness: Wilde M. Bolles

Witness: [Signature]

STATE OF SOUTH CAROLINA)
COUNTY OF) PROBATE

PERSONALLY appeared before me Wilde M. Bolles

and made oath that he/she saw the within named

Personal Representative(s) sign, seal, and as their act and deed, deliver the within written Deed, and that he/she with

Lena Jenkins witnessed the execution thereof.

SWORN to before me this 26 day of May 2000

Witness Signature: Wilde M. Bolles

[Signature]
Notary Public for South Carolina
My Commission Expires: 2005/16/July

9/5 62-2624-~~WILLIAM TAYLOR~~
ST. HELENA

9/5

2-2-59.13 Heirs of William (#1) Taylor.
c/o Rita Colly
Frog., S. C. (Warsaw)

Acres

Will.

H

9/5

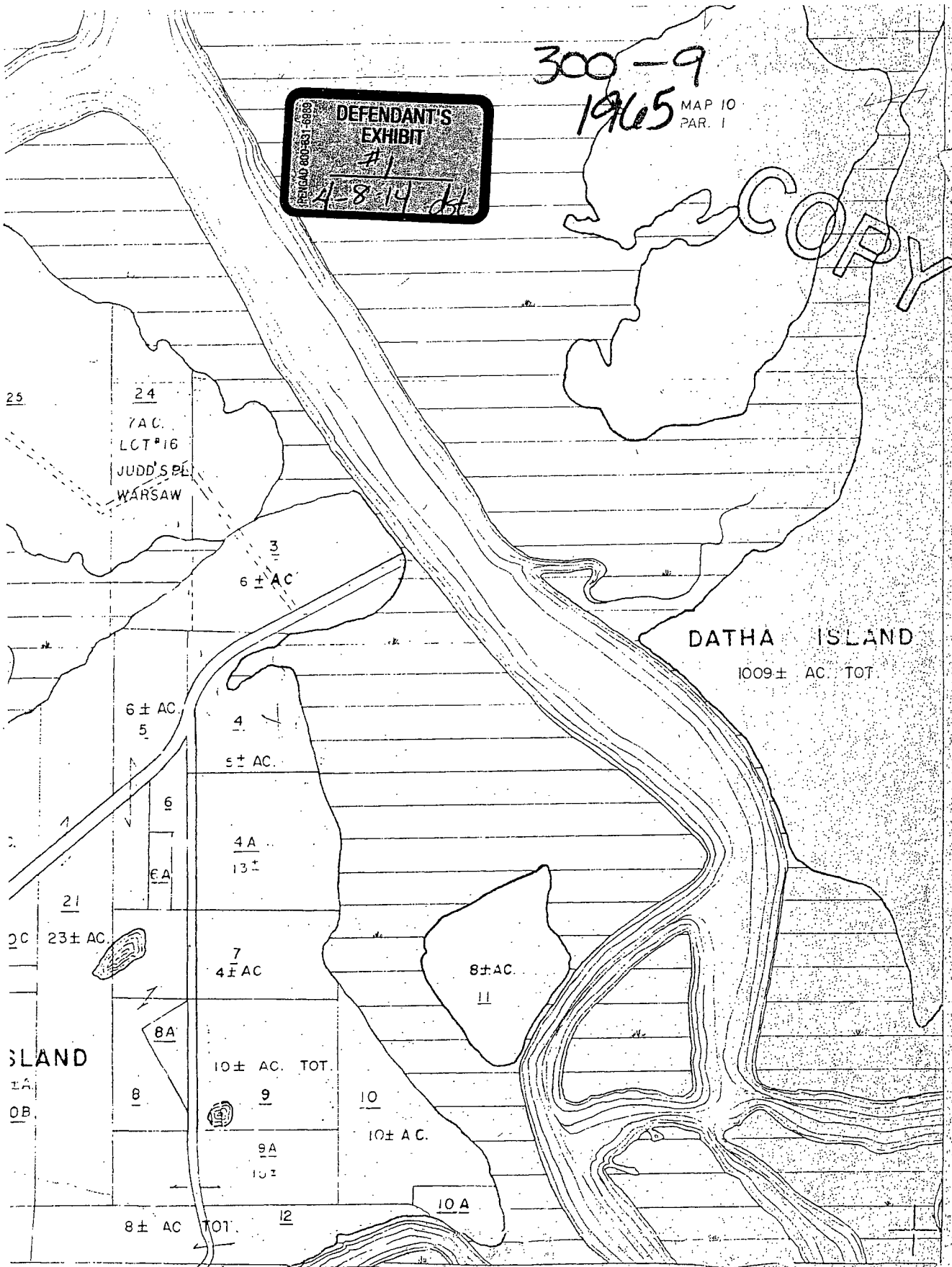
9/5 = 6 Ac

05/20/2013 15:46 BEAUFORT CO ROD

300-9
1965 MAP 10
PAR. I

DEFENDANT'S
EXHIBIT
#1
4-8-14 dt

COPY



BEAUFORT COUNTY, SOUTH CAR

DATE: 1954
REVISED 1965

SCAL 300-9

RESIDENTIAL PROPERTY RECORD CARD

2H-100

ST HELENA

9 15

PROPERTY ADDRESS

TOWNSHIP

MAP NO.

PARCEL NO.

BUILDING NO. 1 2 3 4

BUILDING NO. 1 2 3 4

BUILDING NO. 1 2 3 4

CARD / OF /

RES

ROOF

ROOMS

NOTES

1. RES

Fiber

Total Res. Rooms

2

2. RES

Shed

Rental Units

3. RES

Gable

Rooms

4. RES

Hip

Efficiency Apts.

5. RES

General

Room Apts.

6. RES

Roll

Room Apts.

7. RES

Shew

Room Apts.

8. RES

Shingles

Room Apts.

9. RES

Shingles

Room Apts.

10. RES

Composition

Notes

11. RES

Metal

PLUMBING

12. RES

Wood

2

13. RES

Adhesive

2

14. RES

Tile

3

15. RES

Tile

4

16. RES

None

4

17. RES

Unfinished

1/2 Tile Wall

18. RES

Finished

Full Tile Wall

19. RES

Notes

Notes

20. RES

Wood Frame

FLOORS

21. RES

C.B. Frame

None

22. RES

Tile Frame

Chimney

23. RES

Brick Frame

Fireplace

24. RES

Stone Frame

Hot Air

25. RES

Sheathing

Steam

26. RES

Roll

Forced Hot Air

27. RES

Shew

Hot Water

28. RES

Shingles

Notes

29. RES

Composition

ELECTRICITY

30. RES

Metal

Unfinished

Yes

31. RES

Wood

Wall Board

None

32. RES

Adhesive

Notes

33. RES

Stucco

Plaster - Pen. Brd.

34. RES

Common Brick

Plywood - Pine Pan.

Vent Fan

35. RES

Face Brick

Hardwood Panel

Air. Con. Stopping

36. RES

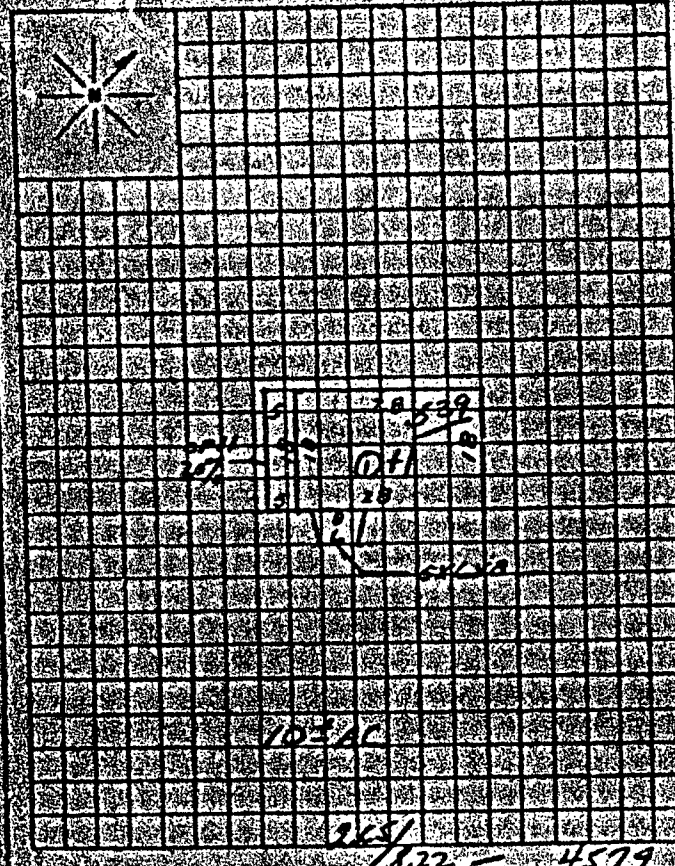
Stone

Parred

Insulation

Notes

SCALE: 1" = 30' 60' RANDOM PLOTTED DRAWN BY L.G.B. 11/10/54 CLASSIFIED BY



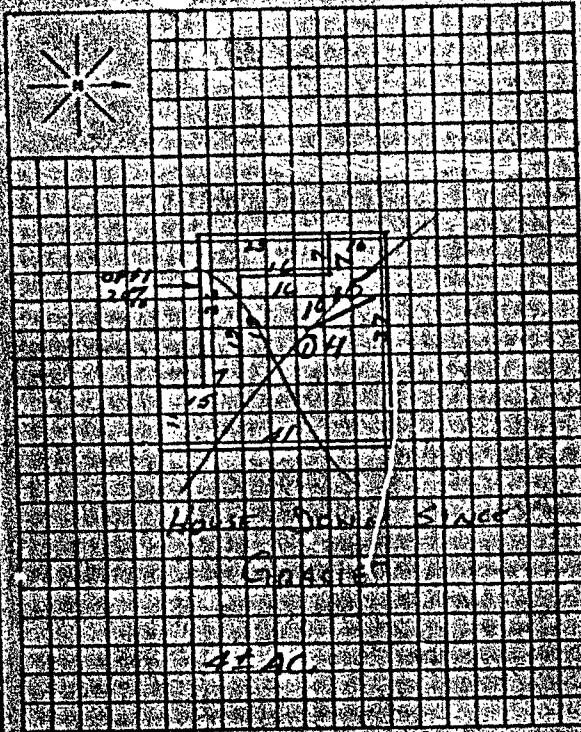
#	STYS.	SH.	CLASS.	AREA	DATE	FLATS	REPL. COST	DATE BUILT	DEP. DATE	COND.	VALUE - 1950	CO. ID.	VALUE - 1966	COND.	VALUE - 1973	COND.	VALUE - 19	APP.
1	1	R	RL	557	265	547	4476	1936		36	446	20	690	35	1600			
2																		
3																		
4																		
TOTALS											446		690		1600			

PROPERTY AND ASSOCIATED VALUATION SERVICES AND CONSULTANTS FORM 1940-53

10
9
8
7
6
5
4
3
2
1

RESIDENTIAL PROPERTY RECORD CARD

2H-100-143



PROPERTY ADDRESS		TOWNSHIP		MAP NO.	PARCEL NO.
		ST HELENA		9	16
BUILDING NO. 1 2 3 4	BUILDING NO. 1 2 3 4	BUILDING NO. 1 2 3 4	CARD / OF /		
ROOF		ROOMS		NOTES	
RES	Flat	Total Res. Rooms	7		
	Shed	Rental Units			
	Gable	Rooms			
	Hip	Efficiency Apts.			
	Gambrel	Room Apts.			
	Half	Room Apts.			
	Shed	Room Apts.			
	Shed	Room Apts.			
SUB-STRUCTURE		Notes			
Slab	Composites	Notes			
Plum	Metal	Notes			
Common Wall	Wor	Notes			
Brick Excavation	Arches	Notes			
Con. Basement	Tile	Notes			
Unfinished Basement	Stone	Notes			
Unfinished Basement	Notes	Notes			
Basement Living One	Unfinished	Notes			
Notes	Unfinished	Notes			
EXTERIOR WALLS		FLOORS		HEATING	
Wood Frame	Notes	Concrete	Notes	Boiler	Notes
C. S. Frame	Notes	Brick	Notes	Chimney	Notes
Tile Frame	Notes	Double	Notes	Firescope	Notes
Brick Frame	Notes	Plum	Notes	Hot Air	Notes
Stone Frame	Notes	Hardwood	Notes	Steam	Notes
Shedding	Notes	Concrete	Notes	Forced Hot Air	Notes
Shed	Notes	Tile - Terrazzo	Notes	Hot Water	Notes
Shingles	Notes	Notes	Notes	Notes	Notes
Composition	Notes	EXTERIOR WALLS		ELECTRICITY	
Notes	Notes	Unfinished	Notes	Yes	Notes
Wood	Notes	Wall Paper	Notes	Notes	Notes
Asbestos	Notes	Ceiling	Notes	Notes	Notes
Sharon	Notes	Plaster - Plaster	Notes	EQUIPMENT	
Common Brick	Notes	Plywood - Ply Wood	Notes	Wash Fan	Notes
Face Brick	Notes	Hardwood Panel	Notes	Air Conditioning	Notes
Stone	Notes	Formed	Notes	Insulation	Notes
Notes	Notes	Notes	Notes	Notes	Notes

SCALE 1" = 30' 60' RANDOM PLOTTED DRAWN BY L.G.R. 11/10/54 CLASSIFIED BY

#	TYPE	CLASS	AREA	RATE	FLATS	REPL. COST	DATE BUILT	DEF. RATE	COND.	VALUE - 1957	COND.	VALUE - 1957	COND.	VALUE - 1957	COND.	VALUE - 1957	REP.
1	1	RT	1173	4.19		235	1950	25	FD	6000							
2																	
3																	
4																	
TOTALS										531							

REPRODUCED AND ADAPTED FROM THE RESIDENTIAL PROPERTY RECORD CARD FORM 500-10-54



PROPERTY ADDRESS: 73 TRACT 6-1-1
 ZONING: 300 USE: 300 TAX CODE: 300 SP. DIST: 06/12/85 DATE PRINTED: 6113-11 CLASS: 3001 AREA: R300-009-006-0005-0003 PARCEL NUMBER: 274642 KEYNO: 274642

LAND DESCRIPTION	Size Dimension - L x W FF Depth/Acres	ADJ. FACTOR	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT	ADJ. UNIT
73 TRACT 6-1-1 FP1.0	X X	A=98 E=460	100 460	72 B	5000.00 150.00	1765.00 1610.00	6.00 1.00	10590 1610.0			

TAYLOR WILLIAM 1 HR. OF MAP -
 VACANT
 6-18-85
 Take House off for
 1985 taxes

CARDS IN ACCOUNT - 01 OF 01

COST	13156
MARKET	
INCOME	
USE	
APPRAISED VALUE	
A	13156
PARCEL SUMMARY	
LAND	10590
BLDG	2600
O-IMPS	
TOTAL	13156
N CNST	1125
PRIOR YEAR VALUE	
LAND	10600
BLDG	2600
TOTAL	13200

Description	Rate	Square Feet	Rate Cost
BAS 100	24.21	539	13049
OP2 20	4.84	90	436

LIVING AREA 539 SINGLE-FAMILY

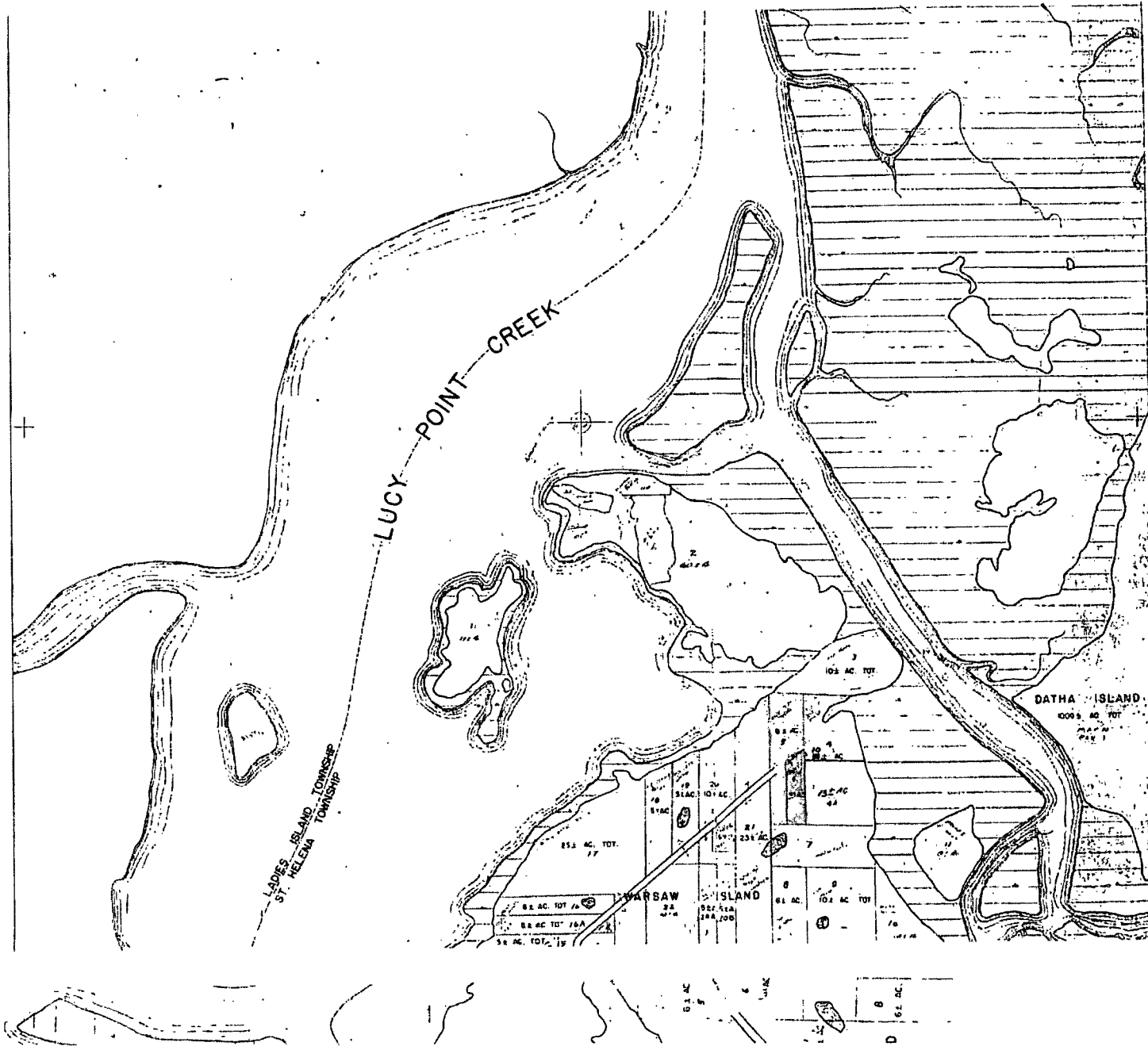
BASE 18' x 18'

BUILDING DIMENSIONS
 BAS E02 S05 E07 N05 E19 N18 N28
 OP2 W05 S18 .1 BAS S18

ELEMENTS	CODE	CONSTRUCTION DETAIL
CONSTR	GP100	
FOUNDATION	02	CONCRETE
EXT. CLERS	01	WOOD FRAME
ROOF TYPE	01	SHINGLES
ROOF COVER	01	SHEET METAL
FLOORS	07	SINGLE PLY
INTERIOR	02	WALLBOARD
ELECTRICAL	01	MINIMUM
PLUMBING	02	MINIMUM
HEATING	00	
APART. EQUIV.	00	
PARTITION	00	
SPECIAL USE	00	

ST. HELENA ISLAND NORTH OF US 21 AREA

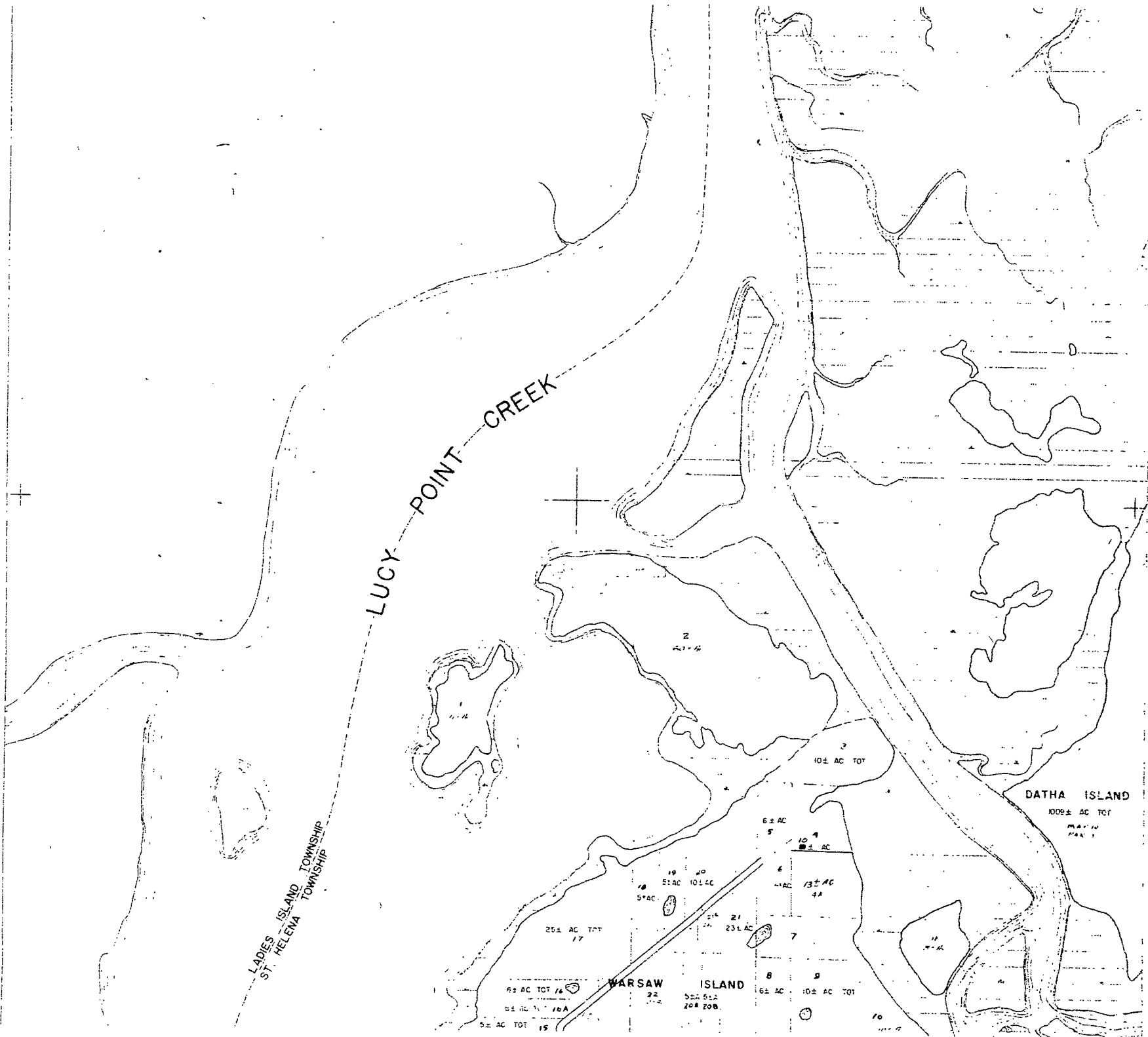
LAND	10590	TOTAL MARKET
AREA	2600	13156
WARRANTY	2475	16489
STANDARD		20



- 3 Dan Taylor
- 4 George Taylor
- 4A no card
- 7 Amelia Mattis
- 21 James Gardner
- 5 William Taylor
- 6 Phoebe Taylor
- 6A James Taylor

1954





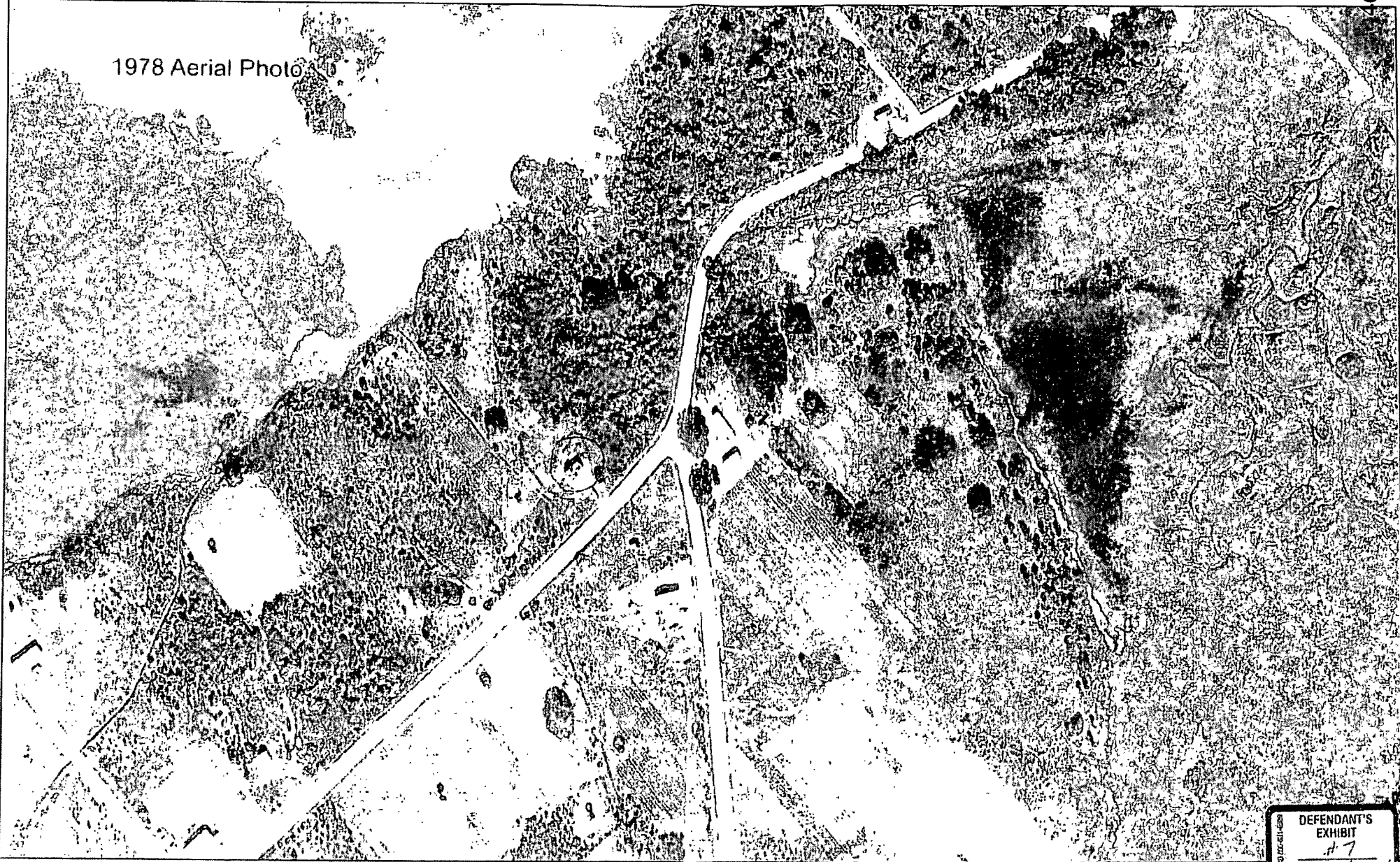
1954 AERIAL PHOTO CBR



DEFENDANT'S
EXHIBIT
3/462
-8-14

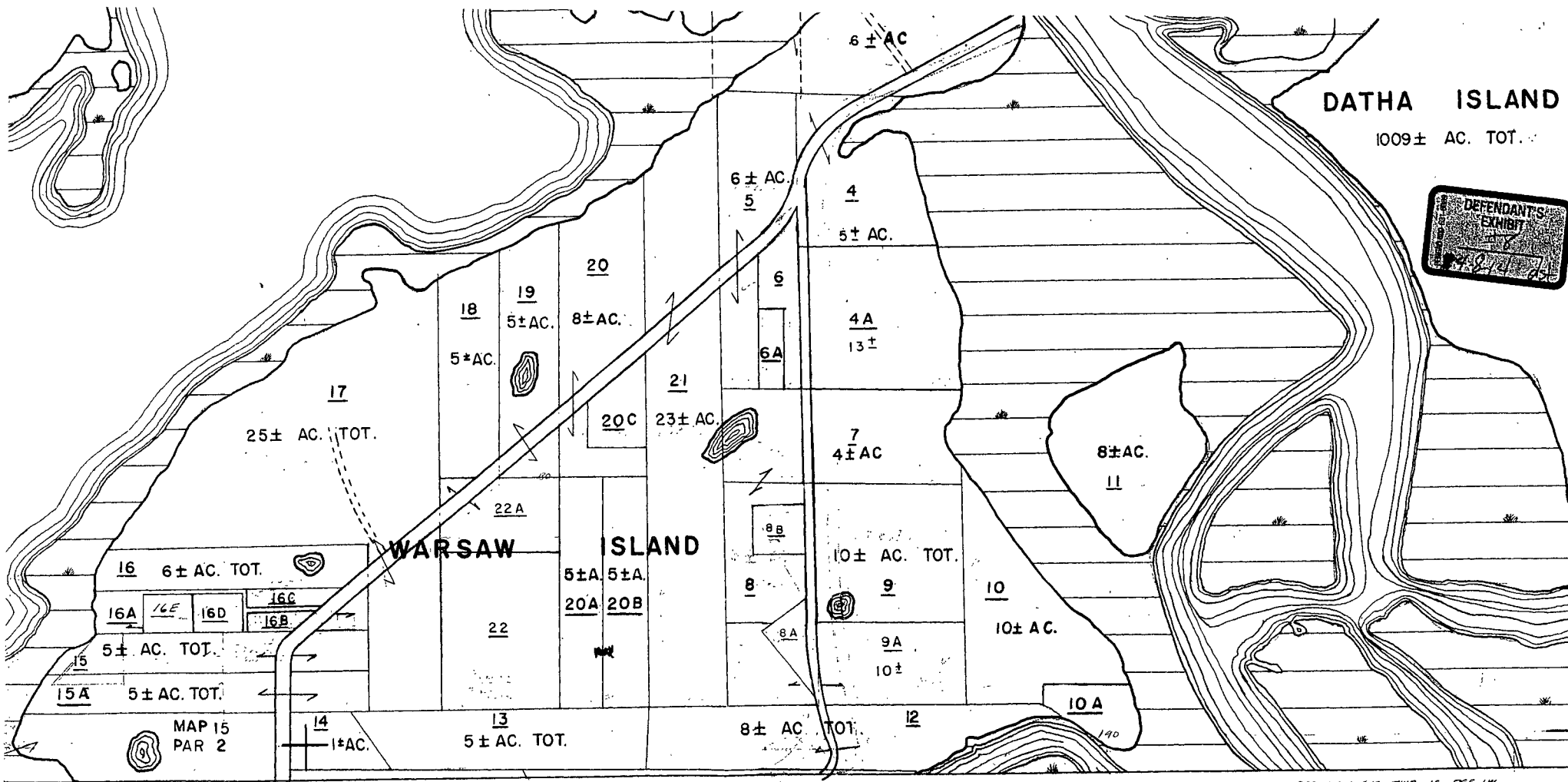
CBR GIS DEPT

1978 Aerial Photo



63

DEFENDANT'S
EXHIBIT
7
4-8-14 dst



DATHA ISLAND
1009± AC. TOT.

DEFENDANT'S EXHIBIT
7
1/28/75

WARSAW ISLAND

See Sheet 15

SEC. 1, 2, 11 & 12, TWP. 15, R5E. 1W

BEAUFORT COUNTY, SOUTH CAROLINA

THIS MAP IS FOR TAX PURPOSES ONLY. ALTHOUGH IT IS COMPILED FROM RECORDED DEEDS AND PLATS, IT IS NOT INTENDED TO REPRESENT AN ACTUAL SURVEY, AND SHOULD NOT BE CONSTRUED AS SUCH.

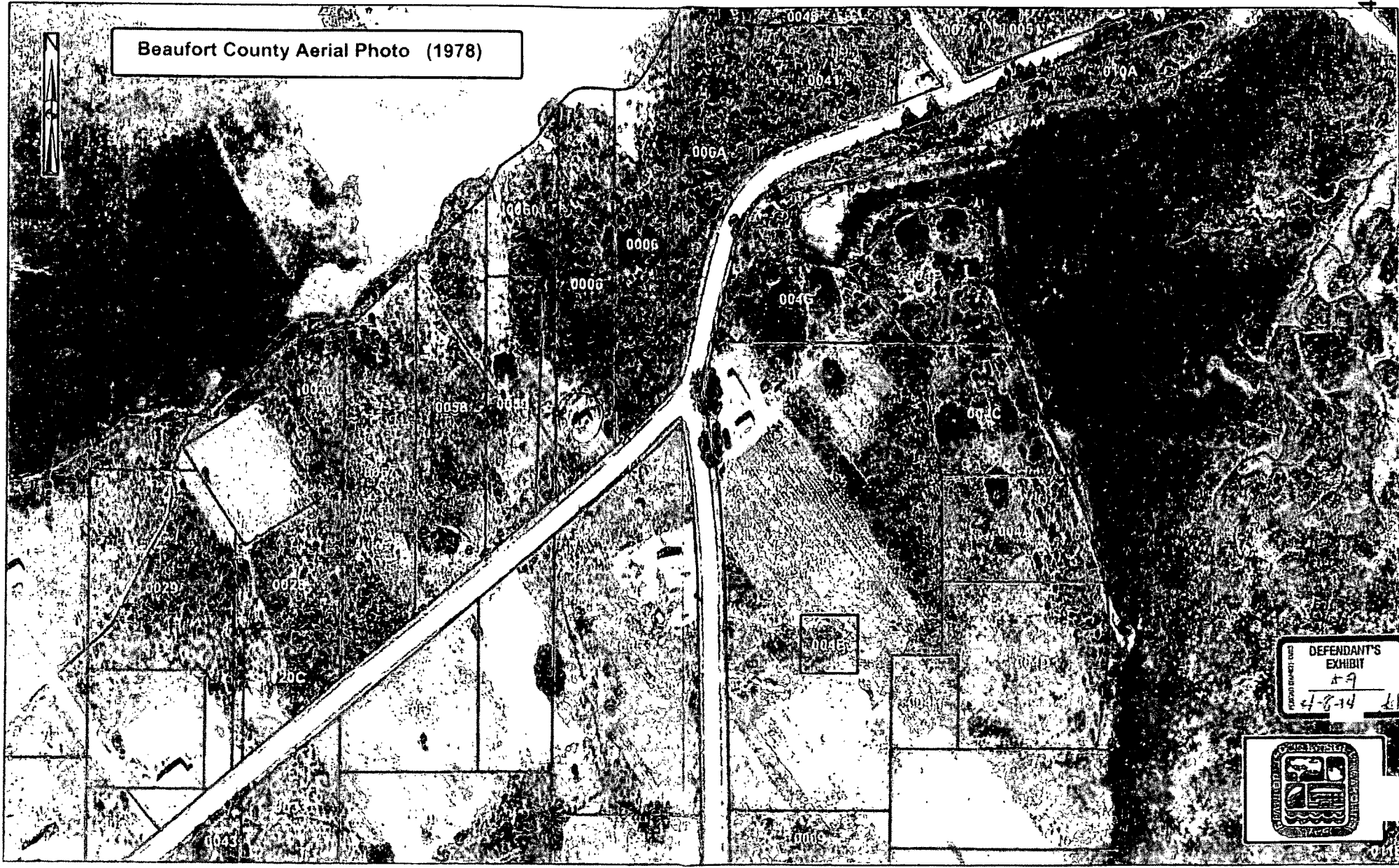
DATE: 1954
REVISED 1965

SCALE: 1" = 400 464

ST. HELENA

SHEET NO. 9

Beaufort County Aerial Photo (1978)



DEFENDANT'S EXHIBIT
 59
 4-8-14





PERIGLO 800-631-6989

DEFENDANT'S
EXHIBIT
#10
4-8-14 dst

006



467

PERGAD 600-631-6989
DEFENDANT'S
EXHIBIT
11
48-14 *dst*



PERIGAD 800-631-6989

DEFENDANT'S
EXHIBIT

#12

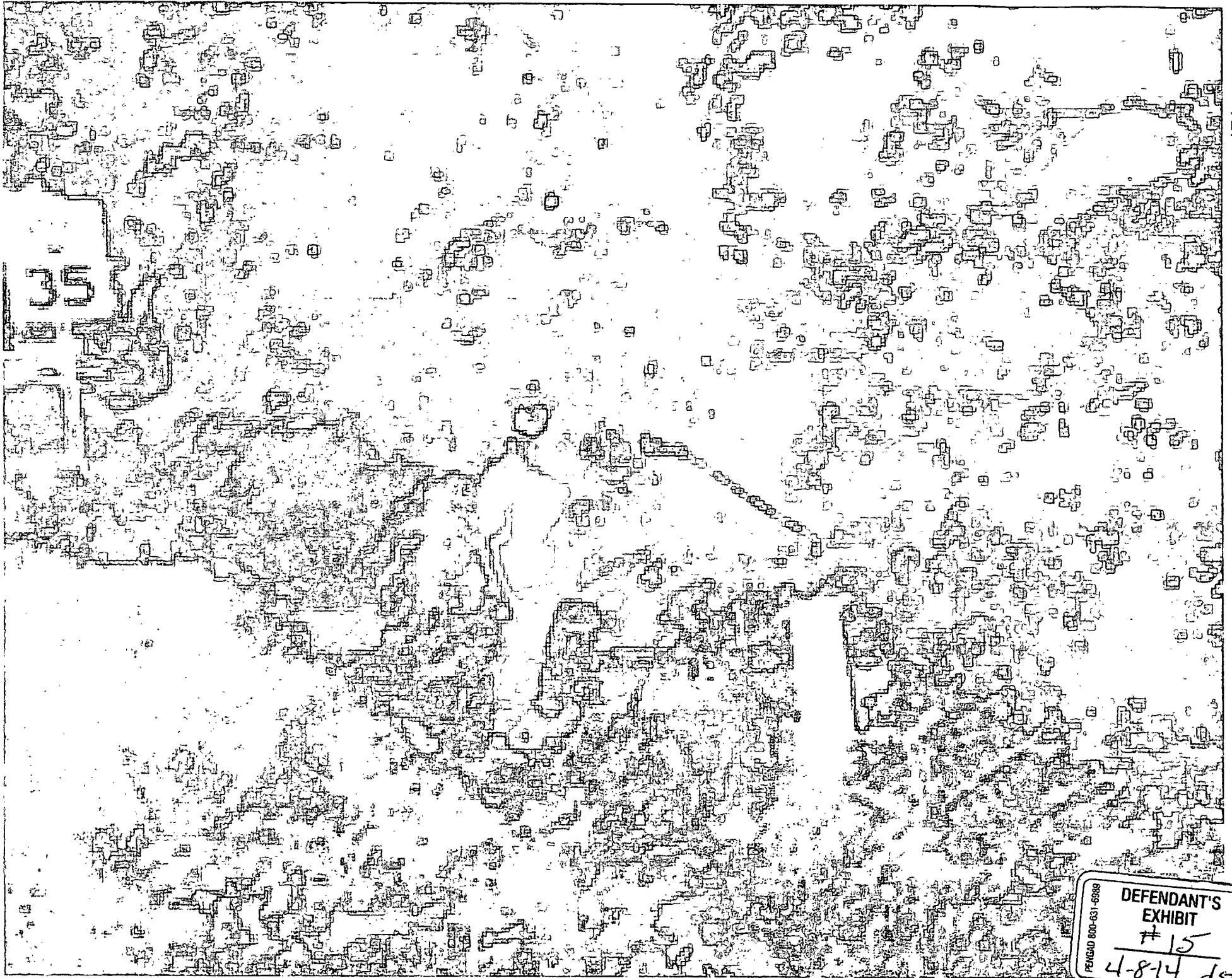
4-8-14 dst



PELICAD 800-631-6666
DEFENDANT'S
EXHIBIT
#13
4-8-14 dst



PENCAD 800-631-6989
DEFENDANT'S
EXHIBIT
#14
4-8-14 *djt*



PEKAD 800-631-6989
DEFENDANT'S
EXHIBIT
15
4-8-14 dst

Bidder No: 136

BEAUFORT COUNTY TREASURER
TEMPORARY TAX RECEIPT FOR REAL PROPERTY

DELINQUENT TAX SALE

The below property is sold for nonpayment of 1994 or prior years tax.
\$ 105.49

October 2, 1995

Bidder's Name:
James J. Taylor
141 Gardner Dr.
St. Helena SC 29920

Key: 274651
District: 300 Map: 9
Parcel: 6 Block: 0T95
Acres: 1.3 Lots: 0
Buildings: 0

Owner's Name: TAYLOR PHOEBE

\$ 152.94

Highest bid received: 259.35

94's only

Treasurer's Titles can not be given until after expiration of twelve (12) months from the date of purchase, as owner, successor in title, judgement, creditor, or mortgagee can redeem same by paying taxes, penalty, and the cost of eight percent (8%) on purchase price. If a sale is voided, the bidder will not receive eight percent (8%) interest on the bid price.

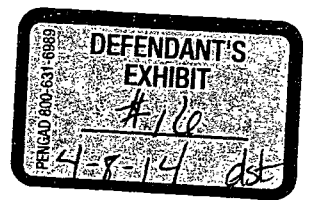
258.43
20.67
179.10
30.00
309.10

1995
R # 35320
10/23/95
\$ 105.49
(R)
152.94
20.67
173.61
95=105.49
279.10

Joy Logan, Treasurer

Herschel J. Evans, Jr., Deputy Treasurer

Ø



TREASURER
TAX BILL

ACCT KEY: 07274637
ACCOUNT: R300 009 000 0006 0000
DISTRICT: ST HELENA ISLAND
TYPE PROPERTY CODE: 6003-91
ASSESSMENT RATIO: 6 PERCENT

PAYABLE NOW..

OUTSTANDING TAX RECAP			
YEAR	TAX-DUE	PENALTY	TOTAL
1994	102.55	50.39	152.94
TOTAL-	102.55	50.39	152.94

BREAKDOWN OF 1994	
ACCOUNT	MILL
COUNTY	52.9
SCHOOL	121.5
FIRE DIST	30.2
INDG-CARE	2.5
CONT EDJC	2.0
TOTALS -	219.1

TAYLOR PHEME
3 JAMES TAYLOR
RR 3 BOX 140
ST HELENA ISLAND SC 29920-9803

ACCOUNT D
ITEM
LAND VAL
TAXABLE
ASSESSED
NO. ACRES

** THIS BILL SUPERCEDES ANY PRIOR 1994 TAX BILL **

MAKE CHECKS PAYABLE TO: JOY LOGAN, BEAUFORT COUNTY TREASURER

IF NOT PAID ON OR BEFORE 31 AUGUST THIS PROPERTY WILL BE DULY ADVERTISED AND SOLD FOR DELINQUENT TAXES AS DESCRIBED ABOVE ON THE FIRST MONDAY IN OCTOBER, THIS YEAR. RETURN OF THIS "CERTIFIED RECEIPT" SHALL BE DEEMED EQUIVALENT TO "LEVYING BY DISTRESS"



100B

49246

1390

THE STATE OF SOUTH CAROLINA,
COUNTY OF BEAUFORT

55 1.30
TAX TITLE BY THE TREASURER

TO ALL WHOM THESE PRESENTS MAY CONCERN:

WHEREAS, the provisions of Title 12, Chapter 51, Section 10 through 170 of the South Carolina Code, 1976, as amended, entitled "Alternate procedure for Collection of Property Taxes," duly enacted by the General Assembly of the State of South Carolina, provide an additional method and alternate procedure for the collection, handling and distribution of delinquent property taxes, penalties and costs due to counties and other political subdivisions of the State; and

WHEREAS, the provisions of the aforesaid Title 12, Chapter 51, Sections 10 through 170, authorize the levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the taxes, penalties, costs and sale of property following proper advertisement of the property for sale; and

WHEREAS, I, JOY LOGAN, TREASURER OF BEAUFORT COUNTY, pursuant to the authority of the aforesaid provisions and amendments thereto, issued a warrant or execution in duplicate against Taylor, Phoebe, a defaulting taxpayer of said Beaufort County, to levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the 1994 (year) taxes and costs in the amount of \$ 152.94; and

WHEREAS, by virtue of said warrant or execution, Herschel J. Evans, Jr. (authorized officer) did on May 1, 1995 (date of certified mail notice of delinquent tax), under cover of "certified mail - return receipt requested, deliver to addressee only," mail notice to said delinquent taxpayer; and indicate whether or not received; and was received.

WHEREAS, (in the event the certified mail notice was returned), the officer authorized and directed to collect delinquent taxes, penalties and costs did, on N/A (date of posting of notice), take exclusive possession of the property against which such taxes were assessed by posting of a notice at one or more conspicuous places on the real premises hereinafter described, reading "seized by N/A (person officially charged with collection of delinquent taxes of Beaufort County) to be sold for delinquent taxes"; and

WHEREAS, Herschel J. Evans, Jr. (person officially charged with the collection for delinquent taxes) did thereafter properly advertise the property for sale once a week for three successive weeks for sale in September 1995 (month/year); and

Dist.	Map	Section	Parcel
300	9		49

WHEREAS, upon the failure of the delinquent taxpayer, or anyone acting in his behalf, to pay the taxes, penalties and costs, the property described hereinafter was duly sold at public auction on the sales day of the month of October in the year 1995 during the usual hours of sale, to James J. Taylor (purchaser), the purchaser and the highest bidder at such sale for the sum of (\$ 258.43), and furnished the purchaser a receipt for such purchase money and annexed such receipt to the duplicate warrant for the endorsement thereon of his actions thereunder; and

WHEREAS, under cover of certified mail, return receipt requested, deliver to addressee only, Herschel J. Evans, Jr. (person officially charged with the collection of delinquent taxes) did, on August 30, 1996 (date) mail to the owner of record on February 1, 1996 (year of expiration of redemption period) a Notice addressed to Taylor, Pheobe (owner of record on February 1, immediately preceding the end of the redemption period) that the property described on the Notice had been sold for taxes and advising said owner if not redeemed by paying taxes, penalties, costs and interest in the amount of \$ 279.10 on or before October 2, 1996 (twelve months from date of sale) a tax title would be issued to the successful purchaser at the tax sale; and was not redeemed; and

WHEREAS, twelve months have elapsed since the date of sale for delinquent taxes, and the said Taylor, Pheobe (defaulting taxpayer) or other parties interested after due notice have failed to redeem said lands so sold.

NOW THEREFORE, I, JOY LOGAN, TREASURER OF THE COUNTY OF BEAUFORT, in consideration of the premises, and the sum of (\$ 258.43) to me by the said James J. Taylor have granted, bargained, sold and released, and by these presents do grant, bargain, sell and release unto the said James J. Taylor;

All that certain piece, parcel or lot of land, situate, lying and being in the St. Helena Island District, containing 1.3 acre in Beaufort County, South Carolina, and being the Western portion of Parcel 6, bounded on the North by marsh, on the East by the remainder of Parcel 6, Pheobe Taylor, on the South by highway, and on the West by Geneva & Rufus Taylor, Parcel 36.

This is the same lot of land sold at the Delinquent Tax Sale of
(Month/Day) October 2, _____, 19 95, for delinquent
taxes in the name of Taylor, Pheobe
(District 100, Map 9, Submap _____)
(Parcel 6, Block T95)

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

TO HAVE AND TO HOLD all and singular the premises hereby granted, and with the appurtenances, unto the said James J. Taylor, heirs and assigns forever, according the form, force and effect of the laws and usages of the State of South Carolina, in such cases made and provided.

WITNESS my Hand and Seal this 18th day of December, in the year of our Lord One Thousand Nine Hundred and Ninety - six and in the 120 year of Independence of the United States of America.

Signed, Sealed and Delivered in the Presence of:

Candace O. Harvey
Alicia M. Hollingsworth

Joy Logan
JOY LOGAN
TREASURER OF BEAUFORT COUNTY

State of South Carolina)
County of BEAUFORT)

Probate

Personally appeared before me Candace O. Harvey who, being duly sworn, deposed and said that (s)he saw the within named Joy Logan as Treasurer of Beaufort County sign, seal and deliver the within deed, and (that (s)he, together with Alicia M. Hollingsworth, witnessed the execution thereof. Candace O. Harvey

SWORN to and subscribed before me
this 19th day of December, 19 96
Alicia M. Hollingsworth (SEAL)
Notary Public for South Carolina

My commission expires: My Commission Expires March 29, 2000

The State of South Carolina,

DEED

TREASURER OF BEAUFORT COUNTY
TO

James J. Taylor
141 Gardner Drive
St. Helena Island, SC 29920

Filed _____ day
of _____ A.D. 19 _____
at _____ o'clock _____ M.
and recorded in Book _____
Page _____ Fee, \$ _____

R.M.C. or Clerk Court C.P. & G.S.
Beaufort County, S.C.

Recorded this _____ day
of _____, 19 _____
in Book _____ Page _____
Fee, \$ _____

Auditor, Beaufort County S.C.

RECORDED THIS 14TH DAY
OF NOVEMBER 19 91
IN BOOK 909 PAGE 1390
James J. Taylor
AUDITOR, BEAUFORT COUNTY, S.C.

511 909 PG 1390
FOLDER #

55 DEC 20 AM 8:51

BEAUFORT COUNTY, S.C.

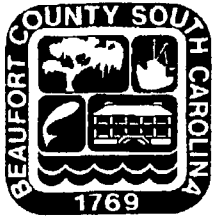
RECORDED

NOV 19 1991

1390

McGovern Office

1390



Joy Logan
BEAUFORT COUNTY TREASURER
P.O. Drawer 487
Beaufort, South Carolina 29901-0487
(803) 525-7107

November 5, 1996

James J. Taylor
141 Gardner Drive
St. Helena Island, SC 29920

Re: Phoebe Taylor - District 300

Dear James J. Taylor:

This is to notify you the deed for the property you purchased at the October 2, 1995 delinquent tax sale is prepared.

Please forward cash, check or money order in the amount of \$26.85. This amount is for cost of preparing and recording the deed, and any tax due at present. Please do not mail cash.

The breakdown for the amount due is as follows:

Deed Preparation:	\$15.00
Deed Recording:	\$11.85
Tax:	
Total due:	\$26.85

The deed will be recorded with R.M.C. when payment is received. It will take 4 to 6 weeks for the deed to be processed. Once this is done, it will be mailed to you.

Sincerely,

Herschel J. Evans, Jr.

Herschel J. Evans, Jr.
Deputy Treasurer

County of Beaufort

355026

Beaufort, S.C. 12-13 1996

Received of James J. Taylor

Twenty-six and $\frac{85}{100}$ Dollars

Fee For Phoebe Taylor - Dist. 300 Tax Sale Split 10-2-95

Deed Preparation, Deed Recording

\$ 26.85 cash in hand
Official Title Clerk



Joy Logan
BEAUFORT COUNTY TREASURER
P.O. Drawer 487
Beaufort, South Carolina 29901-0487
(803) 525-7107

Date: Aug 30, 1996
Taylor, Phoebe
% James Taylor
RR 3 Box ~~140~~ 140
St. Helena SC 29920

RE: 2.6 AC

This is to advise you that the above referenced property in Beaufort County was sold for delinquent taxes on Oct. 2, 1995. The amount necessary to redeem this property is \$ 279.10. If the tax sale is not redeemed on or before Oct. 2, 1996 the property shall be deeded to the successful bidder from the above referenced tax sale.

Please note that tax sale redemptions must be tendered with cash, cashier's check or money order.

DISTRICT	<u>300</u>
MAP	<u>9</u>
PARCEL	<u>6</u>
BLOCK	<u>795</u>
KEY	<u>274651</u>

Joy Logan
Treasurer

10-95

300-9-6

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Taylor, Phoebe
 % James Taylor
~~RR 3 Box 140~~
 141 GARDNER DR
 St. Helena SC 29920

4a. Article Number
 P 378 557 005

- 4b. Service Type
- Registered Certified
 - Express Mail Insured
 - Return Receipt for Merchandise COD

7. Date of Delivery
 8/30/96 RW

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 X Barbara Taylor

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 37



Recd Cert

No Ins Do no (See F

Sent to	Taylor
Street and No.	
P.O., State and ZIP Co	
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Show to Whom & Date Del	
Return Receipt Show Date, and Addressee	
TOTAL Postage & Fees	
Postmark or Date	

PS Form 3800, June 1991

P 917 306 195

RETURN RECEIPT SERVICE	POSTAGE		POSTMARK OR DATE
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY / RESTRICTED DELIVERY	/	
	CERTIFIED FEE + RETURN RECEIPT		
	TOTAL POSTAGE AND FEES		
SENT TO:		NO INSURANCE COVERAGE PROVIDED -- NOT FOR INTERNATIONAL MAIL (SEE OTHER SIDE)	
9300 009 000 0006 0000 TAYLOR PHOEBE JAMES TAYLOR RR 3 BOX 140 ST HELENA ISLAND SC 29920-9803			

PS FORM 3800



RECEIPT FOR CERTIFIED MAIL

SENDER:

- 1. Complete items 1 and/or 2 for additional services.
- 2. Complete items 3, and 4a & b.
- 3. Print your name and address on the reverse of this form so that we can return this card to you.
- 4. Attach this form to the front of the mailpiece, or on the back if space does not permit.
- 5. Write "Return Receipt Requested" on the mailpiece below the article number.
- 6. The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee

3. Article Addressed to:

9300 009 000 0006 0000

TAYLOR PHOEBE
 JAMES TAYLOR
 RR 3 BOX 140 141 Gardner Dr.
 ST HELENA ISLAND SC 29920-9803

4a. Article Number

P 917 306 195

4b. Service Type

CERTIFIED

7. Date of Delivery

5/10/95 RW

5. Signature - (Addressee)

Anna mae Taylor

6. Signature - (Agent)

8. Addressee's Address

(ONLY if requested and fee paid.)

PS FORM 3811, December 1991

DOMESTIC RETURN RECEIPT

OWNER	TMS #	DEED BOOK	PAGE NUMBER
Taylor Phoebe	R300-009-000-0006-0000 2.60 Acres		

MORTGAGEE: None

Bidder No. 47

**BEAUFORT COUNTY TREASURER
TEMPORARY TAX RECEIPT
DELINQUENT TAX SALE**

6%

The below property is sold for non-payment of 1996 or prior years tax.

October 6, 1997

Owner's Name: TAYLOR PHOEBE

Account No. R300 009 000 0006 0000

Acres: 2.6 Lots: 0 Buildings: 0 Key No.: 274651

Description:

Bidder's Name: *James J. Taylor
141 Gardner Ln.
St. H SC*

Highest bid received: 295.90

The statement below applies to Real Estate & Mobile Homes Only.

Treasurer's Title can not be given until after expiration of twelve (12) months from the date of purchase, as owner, successor in title, judgement, creditor, or mortgagee can redeem same by paying taxes, penalty, and the cost of eight-percent (8%) or twelve-percent (12%), as applicable, on purchase price. If sale is voided, the bidder will not receive interest on the bid price.

295.90
23.67

318.57
11.84

330.41

169.59
23.67

193.26
97 = 52.56

245.82
4% 11.84

257.66
40.00 mtg. fee

297.66 6.1998

Joy Logan, Treasurer

Herschel J. Evans, Jr., Deputy Treasurer

Overage
295.90
- 169.59
- 52.56
- 40.00

33.75

1996 BEAUFORT COUNTY DELINQUENT TAX BILL

TOTAL PAYABLE NOW.. 169.59

ACCT KEY ACCOUNT NUMBER
00274651 R300 009 000 0006 0000

ACCOUNT DATA

DISTRICT: ST HELENA ISLAND
TYPE PROPERTY CODE: 6003-91
ASSESSMENT RATIO: 6 PERCENT

ITEM	AMOUNT
LAND VAL	7800
TAXABLE	7800
ASSESSED	468
NO.ACRES	2.60

TAYLOR PHOEBE
C/O JAMES TAYLOR
141 GARDNER DRIVE
ST HELENA ISLAND SC 29920-0000

BREAKDOWN OF 1996 TAXES

ACCOUNT	MILL	TAXES
SOL WASTE	9.70	4.54
COUNTY	50.10	23.44
SCHOOL	126.80	59.34
FIRE DIST	31.40	14.70
INDG-CARE	2.30	1.08
CONT EDUC	1.90	.89
TOTALS -	222.20	103.99

OUTSTANDING TAX RECAP

YEAR	TAX-DUE	PENALTY	TOTAL
1996	103.99	65.60	169.59
TOTAL-	103.99	65.60	169.59

FOR TAX QUESTIONS CONTACT...
COUNTY TREASURER
PO DRAWER 487 BEAUFORT, SC 29901
(803) 525-7201

8230

* IF NAME OR ADDRESS ABOVE IS NOT CORRECT PLEASE CORRECT IT ON REVERSE SIDE *

ACCT KEY ACCOUNT NUMBER
00274651 R300 009 000 0006 0000

PAYABLE NOW.. 169.59

* DO NOT FOLD STAPLE OR BEND *

MAKE CHECKS PAYABLE TO: JOY LOGAN, BEAUFORT COUNTY TREASURER

TAYLOR PHOEBE
C/O JAMES TAYLOR
141 GARDNER DRIVE
ST HELENA ISLAND SC 29920-0000

IF NOT PAID BY SEPTEMBER 15, 1996 THIS PROPERTY WILL BE DULY
ADVERTISED AND SOLD FOR DELINQUENT TAXES AS DESCRIBED ABOVE
ON THE FIRST MONDAY IN OCTOBER, THIS YEAR. RETURN OF THIS
"CERTIFIED RECEIPT" SHALL BE DEEMED EQUIVALENT TO "LEVYING
BY DISTRESS."



SENDER:

- Complete items 1 and/or 2 for additional services.
- Print your name and address on the reverse of this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.

We can return this card

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

ACCT: R300 009 000 0006 0000
 KEY: 0027 4651 DISTRICT: 0300

TAYLOR PHOEBE
 C/O JAMES TAYLOR
 141 GARDNER DRIVE
 ST HELENA ISLAND SC 29920

4a. Article Number

P 967 298 974

4b. Service Type

CERTIFIED

7. Date of Delivery

8. Addressee's Address
(ONLY if requested and fee paid.)

5. Received By: (Print Name)

Barbara Taylor

6. Signature: (Addressee or Agent)

PS FORM 3811, JANUARY 1996

Domestic Return Receipt

P 967 298 974

RETURN RECEIPT SERVICE	POSTAGE		POSTMARK OR DATE
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY / RESTRICTED DELIVERY	/	
	CERTIFIED FEE + RETURN RECEIPT		
	TOTAL POSTAGE AND FEES		
SENT TO:		NO INSURANCE COVERAGE PROVIDED - NOT FOR INTERNATIONAL MAIL (SEE OTHER SIDE)	

PS FORM 3800

US Postal Service

Receipt for Certified Mail

IMPORTANT! PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF RETURN ADDRESS.

OWNER	TMS#	DEED BOOK	PAGE NUMBER
Taylor Phoebe	R300-009-000-0006-0000 1.30 Acres		

MORTGAGEE: - None

LEW T033785JUN1898 >9806<

R E A L P R O P E R T Y V I E W S C R E E N

KEY:00274651 YEAR:97

OWNER:TAYLOR PHOEBE
C/O JAMES TAYLOR
141 GARDNER DRIVE

ACT:R300 009 000 0006 0000
LOC:
MAP:1997B DIST: 300 PCA/PCS:6003-91
SAL:*

ST HELENA ISLAND SC 29920 0000

SPLIT 6/97 1.30 AC 9/49

VALUES:	ASSESSMENT	APPRAISAL
LAND:	3900	3900
BLDG:		
FEAT:		
MARKET:	3900	3900
AG USE:		
INCOME:		
TAXABLE:	3900	3900
EXEMPT:		
ASSESSED:	234	

MULTI:	PARENT:		
AREA:E011	CITY:	BUILDING INFO	
ACRES:	1.30	TYPE:	
LOTS:		YRBLT:	EFFYR:
BLDGS:		SQ-FT:	
ACTIVITY:	98/03/18	EXEMPTS:	
LAST-SALE:	80/01/01	"	
SALE-AMT:		"	
DEED:	V/I:	SPASMT:	
BK/PG:	-	"	
QUALIFIED:		"	
MORTGAGE:		"	
OWN %:100		NET TAXES:	52.56
ADJ#:	DATE:	PAID-TAX:	52.56

JNC:> < DATA :>
MESSAGE: SOLD AT TAX SALE
3:19:51:65 INPUT REQUEST

< SUB:> < YR:>97<
>@<
0.00 Page 1

CLK.T033787JUN1898 >9806<

A C C O U N T T A X I N Q U I R Y
00274651 DISTRICT: 300 OWNER: TAYLOR PHOEBE
T:R300 009 000 0006 0000 PCA:6003-91 LEGAL:

YR	CALC/PD	BASE TAX T	PAYMENTS	PENALTIES	SURCHARGE	TAXES DUE
98	03 18	52.56 A	52.56			
97	10 10	103.99 F	169.59	15.60+	50.00+	
96	09 12	105.49 A	105.49			
95	11 02	102.55 F	152.94	15.39+	35.00+	
94	01 10	95.66 F	95.66			
92	12 28	88.69 F	88.69			

ALL TO: TAYLOR PHOEBE
C/O JAMES TAYLOR
141 GARDNER DRIVE

TOTAL OUTSTANDING:

ST HELENA ISLAND SC 29920 0000
INC: > < DATA: >
MESSAGE: SOLD AT TAX SALE
2:20:11:30 INPUT REQUEST

< SUB: > CONTINUE(X): > <
< YEAR: >97<
>@<
0.00 Page 1

November 10, 1998

James J. Taylor
141 Gardner Lane
St. Helena Island, SC 29920

Re: Pheobe Taylor
R300 009 0006

Dear James J. Taylor:

This is to notify you that the deed for the property you purchased at the October 6, 1997 delinquent tax sale is prepared.

Please forward a guaranteed funds in the form of a cashier's check, personal check, or a money order for \$26.85. This amount is the cost for preparing and recording the deed and any additional monies due at present. Please do not mail cash.

The breakdown for the amount due is as follows:

Deed Preparation:	\$15.00
Deed Recording:	\$11.85
Taxes Due:	\$
Total Due:	\$26.85

The deed will be recorded with the R.M.C. office when payment is received. It will take approximately 4 to 6 weeks for the deed to be processed and recorded. Once this is done, the deed will then be mailed to you.

Sincerely,

Herschel J. Evans Jr.

Herschel J. Evans, Jr.
Deputy Treasurer

November 10, 1998

James J. Taylor
141 Gardner Lane
St. Helena Island, SC 29920

Re: Pheobe Taylor
R300 009 0006

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Sincerely,

Herschel J. Evans, Jr.

Herschel J. Evans, Jr.
Deputy Treasurer

County of Beaufort

439094

Beaufort, S.C. 11/17 1998
 Received of Mr James J Taylor 300-009-0006
 Fee For Deed prep 15.00
Deed recording 11.85
\$ 26.85 Cash Larry Campbell
 Official Title Sec Clerk

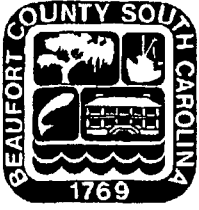
300-9-6

N. marshes of Lucy Creek

E: GA. James Taylor

S: Roadway

W: James Taylor



Joy Logan
BEAUFORT COUNTY TREASURER
P.O. Drawer 487
Beaufort, South Carolina 29901-0487
(803) 525-7107; FAX (803) 525-7254

October 20, 1997

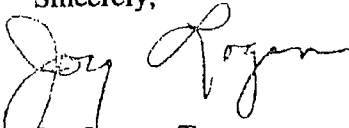
Taylor, Phoebe
% James Taylor
141 Gardner Drive
St. Helena Island, SC 29920

Acct: 274651
District: R300 009 000 0006 0000

The above referenced property located in Beaufort County was sold for delinquent 1996 and/or prior taxes at the Beaufort County Tax Sale on October 6, 1997. The amount necessary to redeem the tax sale is \$193.26. This amount will remain in effect through March 16, 1998. After that date, the redemption amount shall increase by the amount of the 1997 taxes and additional cost of the sale.

All tax sale redemptions must be received not later than 5:00 P.M., October 6, 1998, and must be tendered by guaranteed funds, ie: cash, cashier's check, money order, Visa, Master Card, or Discover Card. You may contact the Treasurer by phone at (803) 525-7301.

Sincerely,


Joy Logan, Treasurer

**Office of the Treasurer
Beaufort County
PO Drawer 487
Beaufort, SC 29901**

Phone: (843) 470-2769 Fax: (843) 470-2773

September 1, 1998

Taylor, Phoebe
% James Taylor
141 Gardner Dr.
St. Helena SC 29920

Re: R300 009 000 0006 0000
October 6, 1997 Tax Sale

Pursuant to SC 12-51-120 notice is hereby provided to you, as the owner of the above referenced property, that you have until 5:00PM on October 6, 1998 to redeem your property from tax sale. The amount necessary to redeem the tax sale is \$297.66. If the redemption is not received by the Treasurer at such time, a Tax Sale Deed shall be issued to the successful purchaser from the sale. The redemption amount includes taxes, penalties, assessments, costs and applicable interest on the bid.

If you have any questions with regard to the tax sale please contact the Treasurer immediately.

Sincerely

Herschel J. Evans Jr.
Deputy Treasurer

Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	Street and No	P.O., State and ZIP Code	Postage	Certified Fee	Special Delivery Fee	Restricted Delivery Fee
			\$			

10-97 TS FN 300

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input checked="" type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: Taylor, Phoebe % James Taylor 141 Gardner Dr. St. Helena SC 29920		4a. Article Number P 378 557 679
5. Signature (Addressee) JAMES TAYLOR		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature (Agent) James Taylor		7. Date of delivery 9/20/98
		8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

2/10/97

58979

RECEIVED
COUNTY OF BEAUFORT
COMM. S. 52

17

THE STATE OF SOUTH CAROLINA,
COUNTY OF BEAUFORT

TAX TITLE BY THE TREASURER

TO ALL WHOM THESE PRESENTS MAY CONCERN:

WHEREAS, the provisions of Title 12, Chapter 51, Section 10 through 170 of the South Carolina Code, 1976, as amended, entitled "Alternate procedure for Collection of Property Taxes," duly enacted by the General Assembly of the State of South Carolina, provide an additional method and alternate procedure for the collection, handling and distribution of delinquent property taxes, penalties and costs due to counties and other political subdivisions of the State; and

WHEREAS, the provisions of the aforesaid Title 12, Chapter 51, Sections 10 through 170, authorize the levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the taxes, penalties, costs and sale of property following proper advertisement of the property for sale; and

WHEREAS, I, JOY LOGAN, TREASURER OF BEAUFORT COUNTY, pursuant to the authority of the aforesaid provisions and amendments thereto, issued a warrant or execution in duplicate against Phoebe Taylor, (a defaulting taxpayer of said Beaufort County), to levy by distress and sale of so much of the defaulting taxpayer's estate, real or personal, or both, as may be sufficient to satisfy the 1996 taxes and costs in the amount of \$169.59; and

WHEREAS, by virtue of said warrant or execution, Herschel J. Evans, Jr., (authorized officer) did on May 1, 1997 (date of certified mail notice of delinquent tax), under cover of "certified mail - return receipt requested, deliver to addressee only," mail notice to said delinquent taxpayer; and indicated whether or not received; and was received

WHEREAS, (in the event the certified mail notice was returned), the officer authorized and directed to collect delinquent taxes, penalties and costs, did on N/A (date of posting of notice); take exclusive possession of the property against which such taxes were assessed by posting of a notice at one or more conspicuous places on the real premises hereinafter described, reading "seized by N/A (person officially charged with collection of delinquent taxes of Beaufort County) to be sold for delinquent taxes"; and

WHEREAS, Herschel J. Evans, Jr., (person officially charged with the collection of delinquent taxes) did thereafter properly advertise the property for sale once a week for three successive weeks for sale in October - 1997 (month/year); and

R300-9-6-0 I

WHEREAS, upon the failure of the delinquent taxpayer, or anyone acting in his behalf, to pay the taxes, penalties and costs, the property described hereinafter was duly sold at public auction on the sales day of the month of October in the year 1997 during the usual hours of sale to James J. Taylor at such sale for the sum of \$295.00, and furnished the purchaser a receipt of such purchase money and annexed such receipt to the duplicate warrant for the endorsement thereon of his actions thereunder; and

WHEREAS, under cover of certified mail, return receipt requested, deliver to addressee only, Herschel J. Evans, Jr., (person charged with the collection of delinquent taxes) did on September 1, 1998 (date) mail to the owner of record on February 1, 1998 (year of expiration of redemption period) a Notice addressed to Phoebe Taylor (owner of record on February 1, immediately preceding the end of the redemption period) that the property described on the Notice had been sold for taxes and advising said owner if not redeemed by paying taxes, penalties, costs and interests in the amount of \$297.66 on or before October 6, 1998, (twelve months from date of sale) a tax title would be issued to the successful purchaser at the tax sale; and was not redeemed; and

WHEREAS, twelve months have elapsed since the date of sale for delinquent taxes, and the said Phoebe Taylor (defaulting taxpayer) or other parties interested after due notice have failed to redeem said lands so sold.

NOW, I, JOY LOGAN, TREASURER OF THE COUNTY OF BEAUFORT, in consideration of the premises, and the sum of \$295.00 to me by the said James J. Taylor have granted, bargained, sold and released, and by these presents do grant, bargain, sell and release unto the said James J. Taylor.

All that certain piece, parcel, or lot of land, situate, lying and being on St. Helens Island, in Beaufort County, South Carolina containing 1.3 acres and being bordered on the North by marshes of Lucy Creek, on the East by lands of James Taylor, on the South by a roadway and on the West by lands of James Taylor. This being the the Eastern half of Parcel 6, and the remaining 1.3 acres of the original 2.6 acre tract, which was sold previously at tax sale.

This is the same lot of land sold at the Delinquent Tax Sale of October 6, 1997, for delinquent taxes in the name of Pheobe Taylor.

District: 300 Map: 9 S/Map Parcel: 6 Block: T97

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

TO HAVE AND TO HOLD all and singular the premises hereby granted, and with the appurtenances, unto the said James J. Taylor, heirs and assigns forever, according the form, force and effect of the laws and usages of the State of South Carolina, in such cases made and provided.

WITNESS my Hand and Seal this 18th day of November, in the year of our Lord One Thousand Nine Hundred and Ninety eight and in the 222nd year of Independence of the United States of America.

Signed, Sealed and Delivered in the Presence of:

Candace O. Harvey
Laurie Dourough

Joy Logan
JOY LOGAN
TREASURER OF BEAUFORT COUNTY

State of South Carolina
County of BEAUFORT

Probate

Personally appeared before me Candace O. Harvey who, being duly sworn, deposed and said that (s)he saw the within named Joy Logan as Treasurer of Beaufort County sign, seal and deliver the within deed, and that (s)he, together with [unclear] witnessed the execution thereof.

Laurie Dourough

SWORN to and subscribed before me this 18th day of November, 1998

Candace O. Harvey (SEAL)
Notary Public for South Carolina
CANDACE O. HARVEY
NOTARY PUBLIC SOUTH CAROLINA
My Commission expires: MY COMMISSION EXPIRES: MARCH 20, 2005

The State of South Carolina,

DEED

TREASURER OF BEAUFORT COUNTY
TO

James L. Taylor
141 Gardner Lane
St. Helena Island, SC 29920

Filed _____ day
of _____ A.D. 19 _____
at _____ o'clock _____ M.
and recorded in Book _____
Page _____ Fee, \$ _____

R.M.C. or Clerk Court C.P. & G.S.
Beaufort County, S.C.

Recorded this _____ day
of _____, 19 _____
in Book _____ Page _____
Fee, \$ _____

Auditor, Beaufort County S.C.

RECORDED THIS 6th DAY
OF January 1999
IN BOOK AE PAGE 2535
Sharon G. Bennett
AUDITOR, BEAUFORT COUNTY, S.C.

~~FILED
IN
99 NOV 19 11:53
BIN FOLDER#~~
129482454
2238
NOV 23 PM 5:08
BIN 1110
FOLDER# 17

**BEAUFORT COUNTY RECORDS CENTER
2727 DEPOT ROAD - P.O. DRAWER 1228
BEAUFORT, SOUTH CAROLINA 29901**

TRANSMITTAL AND RECEIPT

Page 1 of 1

DEPARTMENT TREASURER	ADDRESS PO BOX 487 BEAUFORT SC 29901	
PHONE 470-2766	RECORDS APPROVED FOR MICROFILMING	DATE FILMED

FOR REFERENCE TO THESE RECORDS, GIVE RECORD CENTER THIS NUMBER

BOX NO.	RECORDS TITLE	DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	SCHEDULE NUMBER	DESTRUCT DATE	DATE DESTROYED	BIN NUMBER
1	GENERAL CORRESPONDENCE (ADMIN. ASST.)	1995-1997	TR74	4/2002	3/13/03	8061
2	NULLA BONA	1993-1994	TR74	4/2005	12/30/97	8062
3	TAX DIGEST	1991 AND PRIOR	TC10	4/2000		8063
4	1992 DELINQUENT TAX DIGEST		TC10	4/2000	9/12/01	8064
5	HOMESTEAD REPORTS	1991, 93, 94	TC10	4/2003		8065
6	1995 TAX SALE FILES		TC10	10/2005		8066 ✓
7	1995 TAX SALE FILES		TC10	10/2005		8067 ✓
8	1993 TAX SALE FILES	, 1994 REDEMPTIONS	TC10	10/2004		8068
9	1994, 95 TAX SALE FILES		TC10	10/2004		8069
10	97/98 GENERAL CORRESPONDENCE, SUPPLIES		TR74	4/2003	6/7/04	8070

DEPT. SIGNATURE: *Louise Dunning* TITLE: *Zonal Tech W* DATE: *4/14/97*

RECORDS RECEIVED BY: *[Signature]* DATE: *4/15/97*

Transmittal and Receipt return to Dept. by: *[Signature]* DATE: *4/15/97*

Revised 10-17-88

BEAUFORT COUNTY RECORDS CENTER
 2727 DEPOT ROAD - P.O. DRAWER 1228
 BEAUFORT, SOUTH CAROLINA 29901

TRANSMITTAL AND RECEIPT

Page 1 of 1

DEPARTMENT TREASURER # 11020	ADDRESS Rm #175 Admin. Bldg., 100 Ribaut Rd., Bft., S.C. 29902
PHONE 470-2765	RECORDS APPROVED FOR MICROFILMING
	DATE FILMED

FOR REFERENCE TO THESE RECORDS, GIVE RECORD CENTER THIS NUMBER →

BOX NO.	RECORDS TITLE	DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	SCHEDULE NUMBER	DESTRUCT DATE	DATE DESTROYED	BIN NUMBER
1	1990 Tax Sale Deeds		TC 10	SC Archives		188
2	1991 Tax Sale Deeds		TC 10	SC Archive		212
3	1993 Tax Sale Records		TC 10	2003 Arch		229
4	1993 & 1994 Tax Sale Records		TC 10	2004 Arch		230
5	1994 Tax Sale Records		TC 10	2004 "		301
6	1995 Tax Sale Records	thru 1999	TC 10	2005 "		338 ✓
7	1996 Tax Sale Records		TC 10	2006 "		
8	1997 Tax Sale Records		TC 10	2007 "		

DEPT. SIGNATURE: Candy Hawery TITLE: Treasurer DATE: 11/02/2001
Ron Bridges
 RECORDS RECEIVED BY: [Signature] DATE: 11/05/01
 Transmittal and Receipt return to Dept. by: [Signature] DATE: 5-1-07
 Revised 10-17-88

**BEAUFORT COUNTY RECORDS CENTER
2727 DEPOT ROAD - P.O. DRAWER 1228
BEAUFORT, SOUTH CAROLINA 29901**

TRANSMITTAL AND RECEIPT

Page _____ of _____

DEPARTMENT Treasurer	ADDRESS 100 Ribaut Rd./ Adm'n. #175	
PHONE 470-2765	RECORDS APPROVED FOR MICROFILMING	DATE FILMED

FOR REFERENCE TO THESE RECORDS, GIVE RECORD CENTER THIS NUMBER

BOX NO.	RECORDS TITLE DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	SCHEDULE NUMBER	DESTRUCT DATE	DATE DESTROYED	BIN NUMBER
135	Delinquent Digest 1997 ?	TC 01	Archival		1350
136	Delinquent Digest 1997 ?	TC 01	Archival		1351
137	Tax Sale Deeds 1992	TC 10	Archival		1352
138	Tax Sale Deeds 1993	TC 10	Archival		1353
139	Tax Sale Records 1995	TC 10	Archival		1369
140	Tax Sale Records 1996	TC 10	Archival		1370
141	Tax Sales Redeemed 1996	TC 10	Archival		1371
142	Delinquent Bills 2000 L-0	TC 05	March 2002	3/6/03	10273
143	Delinquent Bills 2000 A-Ch	TC 05	March 2002	3/6/03	10274
144	Delinquent Bills 2000 Ch-Go	TC 05	March 2002		10275
145	Delinquent Bills 2000 Go-K	TC 05	March 2002		10276
146	Delinquent Bills 2000 P-So	TC 05	March 2002		10277
147	Delinquent-Bi				
147	Delinquent Bills 2000 Sou-Z	TC 05	March 2002	3/6/03	10278

DEPT. SIGNATURE: Hershel J. Evans Jr. TITLE: Deputy Treasurer DATE: Nov. 6, 2002
 RECORDS RECEIVED BY: Ron Bridges DATE: 11/11/02
 Transmittal and Receipt return to Dept. by: _____ DATE: 11/11/02
 Revised 10-17-88

BEAUFORT COUNTY RECORDS CENTER
 2727 DEPOT ROAD - P.O. DRAWER 1228
 BEAUFORT, SOUTH CAROLINA 29901

TRANSMITTAL AND RECEIPT

DEPARTMENT TREASURER #11020	ADDRESS PO DRAWER 487, RM 175 ADMIN BLDG 100 RIBAUT RD BFT., SC 29902
PHONE 470-2765	RECORDS APPROVED FOR MICROFILMING
	DATE FILMED

FOR REFERENCE TO THESE RECORDS, GIVE RECORD CENTER THIS NUMBER

BOX NO.	RECORDS TITLE DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	SCHEDULE NUMBER	DESTRUCT DATE	DATE DESTROYED	BIN NUMBER
1	REASSESSMENT 20% A-Z TAXPAYER 1998	TR-22	3/2006	11/15/07	8073
2	"	"	"	11/15/07	8074
3	"	"	"	11/15/07	8075
4	"	"	"	11/15/07	8076
5	TAX SALE BOOK (GREENBAR) 1991-1998	TC-10	ARCHIVES		3952
6	TAX SALE BOOKS 1999	TC-10	ARCHIVES		3953
7	" 1998	"	"		3954
8	" 1998	"	"		3955
9	" 1997	"	"		3959
10	TAX SALE LEVY BOOKS 1995-1996 500-800, 100-400 & 700, 500-700	TC-10	ARCHIVES		3961
11	TAX DEEDS, TAX SALE 1996	TC-10	ARCHIVES		3962
12	" 1997	"	"		3963
13	" 1998	"	"		3975
15	NON EXECUTED TAX DEEDS 1998-2001	TC-10	ARCHIVES		3979
16	TAX DEEDS, TAX SALE 1999	TC-10	ARCHIVES		3983
17	DELINQUENT DIGEST 2002	TR-13	4/2008	11/15/07	8078
18	200 2002	"	"	11/15/07	8079
19	TAX SALE RECORDS/BOOK 2000	TC-10	ARCHIVES		3985
20	TAX DEEDS, TAX SALE 1996	TC-10	ARCHIVES		3988

DEPT. SIGNATURE: *Betty Brewer* TITLE: TREASURER DATE: 4/13/05

RECORDS RECEIVED BY: *[Signature]* DATE: 4/14/05

Transmittal and Receipt return to Dept. by: _____ DATE: _____

Revised 10-17-88

BEAUFORT COUNTY RECORDS CENTER
 2727 DEPOT ROAD - P.O. DRAWER 1228
 BEAUFORT, SOUTH CAROLINA 29901

TRANSMITTAL AND RECEIPT

Page 1 of 1

DEPARTMENT <u>Treasurer</u>	ADDRESS <u>P.O. Box 487 Beaufort SC</u>	
PHONE <u>X 4760</u>	RECORDS APPROVED FOR MICROFILMING	DATE FILMED

FOR REFERENCE TO THESE RECORDS, GIVE RECORD CENTER THIS NUMBER

BOX NO.	RECORDS TITLE DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	SCHEDULE NUMBER	DESTRUCT DATE	DATE DESTROYED	BIN NUMBER
1	1995 Tax Digest	TC00	10/2005		8047
2	Bankruptcy Files	TC10	10/2003		8048
3	1996 Yellow Notices	TR22	4/2002	3/10/03	8049
4	1996 Yellow Notices	↓	4/2002	3/10/03	8050
5	1996 Yellow Notices		4/2002	3/6/03	8051
6	1996 Yellow Notices		4/2002	3/6/03	8052
7	Certified Green Cards 1996		4/2002	3/6/03	8053
8	Certified Green Cards 1996		4/2002		8054
9	Certified Green cards 1996		4/2002		8055
10	Certified Green cards 1996		4/2002		8056
11	Certified green cards 1996		4/2002	3/6/03	8057
12	Certified Green cards 1996		4/2002	3/10/03	8058
13	"		4/2002	3/10/03	8059
14	"		4/2002	3/10/03	8060

DEPT. SIGNATURE: _____ TITLE: _____ DATE: _____

RECORDS RECEIVED BY: _____ DATE: _____

Transmittal and Receipt return to Dept. by: [Signature] DATE: 4/19/99

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)
)
Maxine Taylor)
)
Plaintiff,)
v.)
)
Heirs of William Taylor; Heirs of E.)
Washington; Heirs of Phoebe Taylor;)
Heirs of Albertha Goodwine; and all)
Persons designated as a class;)
Richard Row, and Beaufort County,)
SC a body politic.)
)
Defendants.)

IN THE COURT OF COMMON PLEAS

CASE NO.: 2011-CP-07-2521

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)
)
Stanley Taylor, Joe A. Taylor and)
Martha T. Brown)
)
Plaintiffs,)
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.)
)
Defendants.)

IN THE COURT OF COMMON PLEAS

CASE NO. 2012-CP-07-2246

POST TRIAL BRIEF OF PLAINTIFFS

These two actions were joined for trial. The properties are all in what is known as Lot 9, Warsaw Island. The Trial commenced on July 29, 2013, and lasted all day. At the end of that portion, the Court raised questions. The matter was recessed and the trial continued on April 8, 2014, and went to its conclusion.

FACTUAL MATTERS

Plaintiffs assert their ancestor, Phoebe Taylor, owned the property. Phoebe obtained a deed in 1937, which is recorded in the records of Beaufort County (see Exhibit 12 of first record).

After Phoebe died, James Taylor, a son, recorded a deed in 1960 to some of the property. This deed was given by his siblings. It is described as the southern portion of the land conveyed to Phoebe Taylor in Book 53 at Page 501 (the 1937 deed). This 1960 deed is Exhibit 11 from the first hearing.

James went into possession, farmed row crops, raised livestock and built a home. He lived in the house until he died in 1999. The Plaintiffs were raised on the land where the home still stands. (See aerial photo Exhibit 9 from second hearing.)

In 1997, an order quieting title to certain property on Warsaw Island was filed. The case number was 96-CP-07-1784. The case was captioned "Isaac Taylor, Rebecca Taylor and Walter Taylor vs. the Heirs of Rufus Taylor, et. al." Albertha Goodwine and Phoebe Taylor were named as Defendants. The two parcels were described as 7.862 acres, more or less, which bisected the Warsaw Island Road, with 5.789 acres to the North and 2.073 acres lying to the South.

The description references a plat by David S. Youmans, RLS, which is a part of the decree. The plat is for Lot 7 of Warsaw. (Note that Plaintiffs own Lot 9). The plat shows the property to the East, which is Lot 9, as "n/f Phoebe Taylor."

Clearly by the quiet title action 1996-97, the Rufus Taylor property was ruled to be in Lot 7, not Lot 9. (See Exhibit 9 to first hearing).

Phoebe Taylor's name appears on the Youmans plat of 1996 (Exhibit 4) and the other plat (Exhibit 1). The surveyors who testified said they researched to get the "lay of the land". Mr. Youmans testified also that he found the tax parcel numbers were switched. He also verified that old descriptions could be off as regards acreage. Mr. Youmans indicated that Ms. Champion's driveway encroached onto Lot 9.

To further verify that Defendants' land was in Lot 7, we see deeds to Christopher Champion in 2007 to the southern portion of Lot 7 (identified as Parcel "F" on the March, 1998, Youmans' plat) which was recorded in Record Book 2597, Page 1245. And, a deed was issued by the three plaintiffs in the 1996-97 quiet title action to Georgia Champion to one acre designated as Parcel "D" (also in Lot 7). That deed is recorded in Book 1034 at page 567.) It was recorded in 1998.

Prior to the trial, Defendants moved to amend their Answer to allege adverse possession. The Court granted the motion and the Answer was amended. At trial Defendants presented no evidence of adverse possession.

The Defendants nor their predecessors have even been shown in a deed of record as to Lot 9.

Ms. Cindy Spencer, a title abstractor tied in all of the record owners of Lot 9. She said the descriptions are "iffy" and this is expected in this area.

However, one thing is constant: the lots run due North and South and those lines have not changed.

James Taylor purchased at two tax sales. The first resulted in a deed recorded in Book 99, page 1390, filed in December 1995. (Exhibit 10). The description was 1.3 acres bonded on the marsh and being the western portion of Parcel 6. We note that this had to be the Northern part as the James Taylor home site is not on the marsh. Of particular the eastern portion of Parcel 6 at a tax sale and his deed was recorded in Book 1110 at page 17.

James Taylor died in 1999 and he devised the southern portion (his home site) to Maxine Taylor. He divided the northern part to Martha Brown, Stanley Taylor and Joe A. Taylor. The plaintiffs have been in possession of the two parcels since the devise. Martha Brown, now deceased, has had a mobile home on the Northern property for almost six years.

LAW AND ANALYSIS

Defendants could produce no deeds to the subject properties. The earlier quiet title reports that Rufus Taylor was "seized and possessed" of the property which is in Lot 7 of the Warsaw Island surveys. Conversely, the plaintiffs trace title back to 1937 and the deed into Phoebe Taylor.

Another point is that James Taylor obtained two tax sale deeds in the late 1990's. Plaintiffs draw the Court's attention to Section 12-51-40, et. seq. of the Code of Laws. These sections deal with procedures for collection of taxes and sale of real estate to satisfy payments. Section 12-51-160 states that an action for recovery of land sold pursuant to this chapter must not be maintained unless brought within two years from the date of sale. The prior quiet title did not concern the land subject hereto. This statute must be strictly construed.

In the trial, much ado was made about acreage. We believe the acreage as to the Lot 9 ownership is "in the ball park". However, Plaintiffs have the law on their side also. As we established, the old land lot lines have remained inviolate.

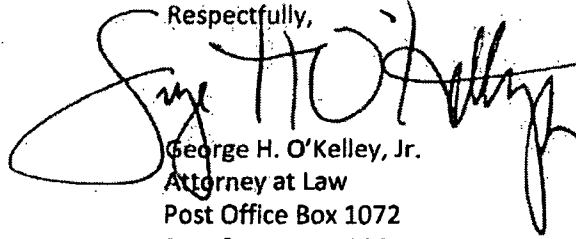
In locating boundaries described in a deed, resort is made first to the natural landmarks, then artificial ones, then adjacent boundaries and last to courses and distances. *Lake View Acres Development Co. vs. Tindal*, 412 SE 2d 457, 306 SC 477 (1991). The rule for determining a dispute in boundaries states that the quantity of land is one of the lowest on the scale of importance. *Kalpmann vs. Hook*, 32 SE 2d 882, 206 SC 51 (1945).

Testimony as to the acreage in Plaintiff's deeds must be relegated to the legal rules. They clearly got, at one time or another, all of Lot 9.

CONCLUSION

The subject properties are owned by the Taylors. In all probability, Rufus Taylor built his house on the wrong side of the property line (east side instead of west). The 1996 quiet title clearly was regarding Lot 7 and no claim to Lot 9 was advanced. If Defendants claimed Lot 9 it would be logical that they would have included it in the 1996 action. All of this, coupled with proven ownership by the Taylor family, compels that judgment in both cases be had in favor of Plaintiffs.

Respectfully,



George H. O'Kelley, Jr.
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Post Office Box 1072
Beaufort, S. C. 29901

April 30, 2014

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)

IN THE COURT OF COMMON PLEAS
14TH JUDICIAL CIRCUIT
CIVIL CASE NO. 2011-CP-07-2521

Maxine Taylor,)
)
Plaintiff,)
)
vs.)
)
Heirs of William Taylor, Heirs of)
E. Washington, Heirs of Phoebe Taylor,)
et al.,)
)
Defendants.)

NON-JURY

POST-HEARING BRIEF OF
DEFENDANTS

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)

IN THE COURT OF COMMON PLEAS
14TH JUDICIAL CIRCUIT
CIVIL CASE NO. 2012-CP-07-02246

Stanley Taylor, Joe A. Taylor)
and Martha T. Taylor,)
)
Plaintiffs,)
)
vs.)
)
Heirs of William Taylor, Heirs of)
E. Washington, Heirs of Phoebe Taylor,)
Heirs of James Joseph Taylor, Heirs of)
Josephine Taylor, and Georgia Champion,)
)
Defendants.)

NON-JURY

POST-HEARING BRIEF OF
DEFENDANTS

1. History of the cases. Plaintiffs brought the actions alleging ownership of all of Lot 9, Warsaw Island, consisting of approximately 10 acres, claiming through a 1937 deed that conveyed approximately 4 acres. Defendants answered denying Plaintiffs' claims, demanding strict proof thereof, and later filed amended Answers counter-claiming that 6 of the 10 acres of the said

Lot 9 are held lawfully by the Heirs of William Taylor by adverse possession. The cases were consolidated and hearings on the matter were held on July 29, 2013 and April 8, 2014.

2. History of the land - Heirs of William Taylor.

a. Defendants unanimously testified that the 6 acres they claim as belonging to the Heirs of William Taylor have been continuously owned, occupied, cultivated, and farmed (raising cattle and other livestock) by their ancestors since St. Helena Island and Beaufort District was occupied by Federal troops in approximately 1863. Defendant Heir of William Taylor, Constance Cooper, testified that the family history of the property included that her great, great grandfather, Billy Taylor, a freed slave, purchased the property for one cent (\$0.01) an acre.

b. Defendants also unanimously testified as to the location of the property occupied by them and their ancestors and as to the use of the property. Georgia Champion testified she was raised on the property by her grandparents, Rufus Taylor and Mary Taylor, and worked the property feeding animals and watering them while growing up. Constance Cooper and her sister, Joan Hilliard, testified they routinely visited the property with their father while growing up. Even Plaintiffs Maxine and Martha Taylor admitted to playing on the property of Rufus and Mary Taylor as youngsters and begrudgingly acknowledged the property's location within Lot 9.

c. Further, Beaufort County records corroborated the ownership claimed by Defendants. In particular, the County taxed the heirs of William Taylor for 6 acres of Lot 9 for as long as records exist through to the present day. The basis for the taxation was the Arthur O. Christensen property card maintained by the County. The "AOC card" references a deed into William Taylor for 10 acres on Warsaw Island, but apparently not in Lot 9.

d. In addition, other evidence corroborated the Defendants' testimony as to the location and occupation of their 6 acres in Lot 9. This evidence included the testimony of Barry Reid, Beaufort County GIS Technician, who authenticated County aerial photographs of the property that clearly show the home built and occupied by Rufus and Mary Taylor as well as their cleared and cultivated land. In addition, at the second hearing on the actions, Defendants produced photographs of and testimony at the second hearing regarding the remains of the Rufus and Mary Taylor home place on Lot 9, particularly revealing portions of what remains of the brick foundation and metal roof of the structure. In addition, at the second hearing photographs of the abandoned

power line to and water meter for the structure were identified and shown to be on Lot 9 as previously testified to by Defendants in the first hearing.

e. Defendants have been consistent in claiming and protecting the property as theirs. In particular, Defendants Georgia Champion and Marjorie Kemp testified at the first hearing that they and their aunt, Albertha Goodwine, promptly objected to Martha Taylor's moving her mobile home onto their property. When they sought to discuss the matter with Martha Taylor, she shut the door on them. While Martha Taylor has regrettably passed during the pendency of these actions, her son, Tommy Brown, Jr., corroborated Defendants' account of this event. Defendants' position was at that time and is now that Martha Taylor placed her mobile home too far to the west in the northeast portion of Lot 9.

f. In sum, Defendants have shown by a preponderance of the evidence a history dating to 1863 of their actual, open, and continuous use, control and occupation of 6 acres of Lot 9 to the exclusion of Plaintiffs.

3. History of the Land - Heirs of James Taylor

a. Plaintiffs are the children of James Taylor, who was the son of Phoebe Taylor. Their claim to property in Lot 9, Warsaw Island, is through the said Phoebe Taylor.

b. By deed of "Josephine Taylor now Black", Phoebe Taylor took title property described as formerly 5 acres, now 4 acres due to erosion. An interesting note on that 1937 deed is that while it appears facially to convey good title, in fact neither title abstractor who searched the records and testified at the first hearing of these cases could find any deed into Josephine Taylor or her husband Ben Taylor that would show her seised and possessed of such land in order to convey good title to Phoebe Taylor in 1937.

c. Notwithstanding this defect, the heirs of Phoebe Taylor in 1960 conveyed to her son, James Taylor, a portion of the 4 acres consisting of 1-1/6 acres, more or less. As Defendants noted early in the presentation of evidence, this conveyance confirms Phoebe Taylor's possession of no more than 4 acres; describes a rectangular parcel running 418' north and south and 146' on its northern boundary and 140' on its southern boundary; contains, by the call of its dimensions, a parcel of 1-1/3 acres (approximately 59,774 sq. ft.); and is further described as the southern portion of Phoebe Taylor's land; and, finally, describes as its western boundary "the Estate of William Taylor".

d. James Taylor later built his house on that 1-1/6 to 1-1/3 acre property, notably locating the house south of Warsaw Road and immediately west of Gardner Drive. All the parties, both plaintiffs and defendants, identified the house and its location both on Defendant's diagrams and on Beaufort County aerial photographs. The call of the deed into James Taylor as well as the erection of James Taylor's house on this land south of Warsaw Road belies any argument that Phoebe Taylor took lands under the 1937 deed exclusively located north of Warsaw Road.

e. Thereafter, in approximately 1985, for reasons no party or living person knows and no County record exists to justify, the tax map parcel number for Phoebe Taylor's and James Taylor's parcels totaling 4 acres was switched with the tax map parcel number for the 6 acre parcel owned by the Heirs of William Taylor.

f. Notably, the taxing authority never changed the acreage assigned to each tax map parcel number, and the Heirs of William Taylor have continued to be taxed on their 6 acres while the heirs of James Taylor have been taxed on a combined total of 4 acres since the switch.

g. In 1995 and 1997, the remaining portion of Phoebe Taylor's property on Lot 9 was sold at County tax sale and purchased by James Taylor. The County Treasurer's office, as was the practice at the time, "carved off" what it considered to be sufficient property to settle the first tax indebtedness of Phoebe Taylor and, at the second tax sale, conveyed the remaining portion to the estate to James Taylor. As a consequence of the switched tax map parcel numbers, the tax deeds into James Taylor described property not of Phoebe Taylor, but of Heirs of William Taylor.

h. While Plaintiffs seek to expand their family's land holdings from 4 acres in Lot 9 to 10 acres, the tax sale files produced by the County Treasurer's Office clearly show that the property sold at tax sales in 1995 and 1997 to James Taylor comes out of Phoebe Taylor's property, not property of William Taylor. Thus, Plaintiffs' property in Lot 9 cannot be and is not of any greater acreage than the 4 acres deeded into Phoebe Taylor in 1937.

4. Location of the Parties' Respective Parcels.

a. Defendants and Defendants' witnesses testified precisely as to the location of the lands of the Heirs of William Taylor. They unanimously recounted a parcel located in Lot 9 of Warsaw Island that extends from the marshes in the northern portion of Lot 9 and include a

section that extends across Warsaw Road in the southwestern portion of Lot 9. As to the northern boundary extending to the marshes, the witnesses consistently testified that their family's cattle grazed in the northern section of Lot 9 and that even today the stakes placed by their ancestors for keeping the livestock from roaming into the marshes are visible at low tide. Plaintiffs could not offer and did not offer any such testimony of use of the northern portion of Lot 9 simply because no such use occurred.

b. Defendant's testimony was uniformly corroborated by Beaufort County records showing Defendants' ownership of 6 acres of Lot 9 and further showing the location of those 6 acres precisely where Defendants located them, that is predominantly north of Warsaw Road with a "tie-in" south of Warsaw Road. Until the inexplicable switching of tax parcel numbers, the County Assessor's and Treasurer's tax records consistently showed Defendants' property so located and still shows Defendants' property in Lot 9 as consisting of 6 acres.

c. As noted above, Plaintiffs' father, James Taylor, erected his home in which Plaintiffs were raised in the southeast portion of Lot 9, south of Warsaw Road and with dimensions showing a rectangular parcel with northern and southern boundary lines of 146' and 140', respectively. According to testimony and such records as were introduced, James Taylor built this house on that 1-1/6 to 1-1/3 acre parcel conveyed to him from Phoebe Taylor's 4 acres.

d. The inescapable conclusion from a reading of the 1937 deed, and the deeds flowing therefrom, is that the Phoebe Taylor land incorporated land both touching the marsh to the north and extending to the south such as to incorporate that land upon which James Taylor built his house and raised his family. Defendants introduced early in the proceedings a diagram that approximates just such a rectangular parcel of land, which would have its principal boundary lines running north/south, consistent with other parcels on the island.

e. Significantly, when Martha Taylor first moved her mobile home onto Defendants' land, the neighboring Defendants did not contend that all the land north of Warsaw Road was Heirs of William Taylor land. Instead, they contended, and maintain today, that Martha Taylor placed her mobile home too far west of her family's property. Thus, upon the Court recognizing the correct boundaries and quieting title as between the parties, Defendants only ask that the Martha Taylor mobile home be relocated to a proper location east of its current location.

5. The arithmetic of the case.

a. Lot 9 consists of approximately 10 acres.

b. Plaintiffs' title abstractor testified that going back to 1863, she could find only one conveyance into Phoebe Taylor in Lot 9, and that was for a parcel consisting of 4 acres, more or less. Defendant' title abstractor confirmed these findings.

c. The heirs of Phoebe Taylor conveyed out to her son, James Taylor, a parcel of 1-1/6 to 1-1/3 acres and lost or let go to tax sale two other parcels in Lot 9 consisting of a total of 2.6 acres, more or less, which parcels were purchased by the same James Taylor.

d. The simple math of the issue confirms that Plaintiffs can own no more than the 4 acres deeded into Phoebe Taylor in 1937. The 1960 deed into James Taylor of 1-1/3 acres and the later purchase by him at tax sale of 2.6 acres total 4 acres almost exactly. The testimony of one of Plaintiffs justifying their claim to the full 10 acres of Lot 9 based on the "more or less" language of the 1937 deed defies the history of the property and common sense.

e. Instead, the evidence supports the Plaintiffs' claim to 4 acres and 4 acres only, and confirms the Defendants title to the remaining 6 acres of Lot 9.

6. The Law and Equity of the Case

a. Plaintiffs' claims to any of Lot 9 in excess of a parcel consisting of 4 acres must fail under the law. They have no deed to more than 4 acres (the tax sale deeds clearly being for parcels coming out of the original 4 acre parcel conveyed to Phoebe Taylor), and can claim no lawful title in the property under any of South Carolina's adverse possession statutes (including under color of law) insofar as Martha Taylor could not claim the minimum 10 year period for true adverse possession; that is, her actual possession, use, control, or improvement of the property prior to commencement of the actions was for a period of less than 10 years. Failure to prove this single element of the allegation causes the action to fail.

b. Contrary to Plaintiffs' claims, the Defendants can and have shown, without rebuttal, their claim of title to the 6 acre parcel of Lot 9 stems from actual possession of the property from 1863 forward. Unrebutted testimony of family members described the property has having been inhabited by Defendants and their ancestors, generations of whom raised their families on the property and lived as subsistence farmers, raising cattle and growing crops on the property. Such

a history of the property meets even the most minimum statutory requirements of actual, open, notorious, exclusive, continuous and hostile possession of the property.

c. In addition, the doctrine of a "lost grant" is applicable to these cases.

(1) Historically, adverse possession is said to be based on the presumption of a lost grant. 2A C.J.S. §317. Under that rule, the long-continued, undisturbed possession of real property, accompanied by the usual claims and acts of ownership such as present here, where it appears from the facts and circumstances of the case that the deed or other muniment of title in question more likely had been executed than it had not been. *Id.* In addition to long-continued, undisturbed possession, other factors to be considered include whether the occupant has held title at all under color of title, has openly asserted title to the property, has paid taxes on the property as if it were his own, has had the beneficial use of the property, has made improvements thereon, or where the opposing party has acquiesced in claimant's occupancy of the property. *Id.*

(2) Here, Defendants have clearly occupied the property to the exclusion of all others since 1863, apparently under color of title, and have paid taxes on the property as their own; have had the beneficial use of the property by raising cattle and crops and raising generations of families on the property; and have made improvements on the property including Rufus and Mary Taylor's house in which Georgia Champion was raised. Further, however grudgingly, Plaintiffs did acknowledge in their testimony, to the extent of their years, the occupation of the property by the heirs of William Taylor, and could make no such claim on the same land on behalf of their family.

d. But for the County's unexplained and undocumented switching of the tax map parcels, the generations of ownership of the 6 acres of land of William Taylor in Lot 9 of Warsaw Island would not be questioned. Nonetheless, that ownership and use of the property for generations, the improvements to the property, and the paying of taxes, cannot, by the terms of law or equity, be undone by a recent claim to the land based on placement of a mobile home on the property for a period of less than 10 years.¹

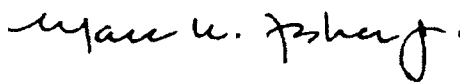
¹ Plaintiffs' claim in their Brief that the disposition of a quiet title action pertaining to Lot 7 is somehow controlling to resolve the present action is misplaced. In particular, the referenced notation on the plat "N/F Phoebe Taylor" would not put Defendants on notice of the switching of the tax map parcel numbers by the County because Defendants also have an ancestor of the same name.

e. Equitable Maxims. Two of the maxims of equity particularly apply to these cases. First, "Equity Will not Suffer a Wrong Without a Remedy." Here, the Defendant Heirs of William Taylor have been nearly dispossessed of land held in the family for generations and but for the County's switching of tax map parcel numbers such title would never have been questioned. The remedy is for the Court to order the County to re-establish the former tax map parcel numbers to the parcels as they are shown on County tax maps of 1956 and as updated in 1965.

Second, "He Who Seeks Equity Must do Equity." Here Defendant Heirs of William Taylor, answering Plaintiffs' Complaints, seeks that the Court quiet title to their property, and are not claiming all of Lot 9 north of Warsaw Road. Defendants have consistently sought to define the Martha Taylor claim to property north of Warsaw as a rectangular portion of the eastern most section of Lot 9 and ask that, as part of its Order, that Plaintiffs simply be ordered to move the mobile home eastward on Lot 9.

7. Conclusion. Plaintiffs have failed to prove their claim to all 10 acres of Lot 9 as alleged. Defendants have proven their title to 6 acres of Lot 9 and, notwithstanding a defective grant into Plaintiffs, do not contest Plaintiffs' title to only 4 acres of Lot 9. Defendants renew their plea that the Court quiet title to the 6 acres as well defined by the County's tax maps of 1956 and 1965. It would be grossly unjust for the Defendants to be dispossessed of property occupied, cultivated and controlled by their ancestors for generations, or for Plaintiffs to increase their ownership from 4 to 10 acres in Lot 9, due to an entirely unexplained, undocumented, and unjustified switching of tax map parcel numbers by a County employee.

Respectfully,



Marc W. Fisher, Jr.
Levin Gilley & Fisher, LLC
Attorneys for Defendants

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

Case No. 2015-000342

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.

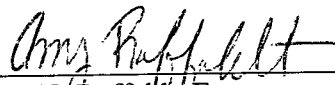
Stanley Taylor, Joe A. Taylor and Martha T. Brown, Respondents,

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.

CERTIFICATE OF COUNSEL

The undersigned attorney hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.



Amy K. Raffaldt, Esq.
Attorney for Appellants

September 9, 2015

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SC Court of Appeals

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

Case No. 2015-000342

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.

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The undersigned attorney hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.



Amy K. Raffalini Esq.
Attorney for Appellants

September 9, 2015