

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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APPEAL FROM THE COURT OF COMMON PLEAS

Roger L. Couch, Circuit Court Judge  
Irvin G. Condon, Probate Court Judge

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Appellate Case No. 2016-001141  
Circuit Court Case No.: 2014-CP-10-4336  
Probate Case No.: 2013-GC-10-1029

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**RECEIVED**

OCT 19 2016

SC Court of Appeals

Peter J. Wellin, Cynthia W. Plum and Marjorie W. King

Appellants,

v.

Keith S. Wellin,

Respondent.

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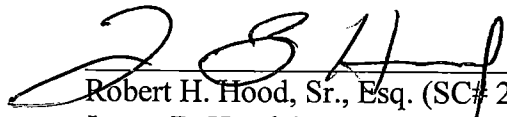
**RESPONDENT'S DESIGNATION OF ADDITIONAL  
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

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Pursuant to Rule 209, SCACR, Respondent designates the following items for inclusion in the Record on Appeal in addition to those designated by the Appellants:

1. 1/14/14 Application of Special Conservator;
2. 2/3/14 Petitioners' Motion to Dismiss Application;
3. 3/11/14 Special Conservator Memo in Opposition;
4. 4/10/14 Supplemental Memo Opposing Reconsideration;
5. Circuit Court appellate briefs; and
6. Notice of Appeal to Court of Appeals.

The undersigned certifies that this Designation contains no material which is irrelevant to the appeal.



Robert H. Hood, Sr., Esq. (SC# 2599)

James B. Hood, Esq. (SC #70212)

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*Attorney for Edward G.R. Bennett*

*as Special Conservator for Keith S. Wellin*

October 17 2016

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CERTIFICATE OF SERVICE

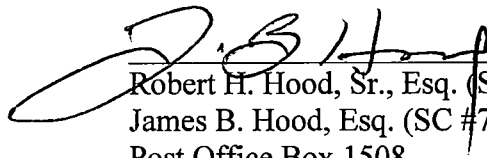
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The undersigned certifies that on this 17th day of October, 2016, a copy of the Initial Brief and Designations of Additional Matter to be Included in the Record on Appeal on behalf of Respondent, was served by depositing said copy in the U.S. Mail, with sufficient first class postage, on the following counsel at the addresses listed below:

Robert H. Brunson, Esquire/ Merritt G. Abney, Esquire  
Patrick C. Wooten, Esquire  
**Nelson Mullins Riley & Scarborough LLP**  
Liberty Center, Suite 600  
151 Meeting Street, Charleston, SC 29401-2239  
Tel: 843.534.4226 Fax: 843.722.8700

A. Mattison Bogan, Esquire  
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Attorney for Edward G.R. Bennett

as Special Conservator for Keith S. Wellin

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SC Court of Appeals

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

Re: Peter J. Wellin, Cynthia Wellin Plum, and Marjorie Wellin King v. Keith S. Wellin  
C/A No. No. 2014-CP-10-4336  
Appellate Case No. 2016-001141  
HLF File No. 528.000

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Respondent's Initial Brief and Designations of Additional Matter to be Included in the Record on Appeal, as well as a Certificate of Service. Please return a clocked-in copy to us in the envelope provided. By copy of this letter, we are serving counsel for Appellant.

Kind regards,

Yours truly,

  
James B. Hood

JBH/jad

Enclosure(s)

cc: Robert H. Brunson, Esquire/ Merritt G. Abney, Esq/Patrick C. Wooten, Esq  
A. Mattison Bogan, Esquire  
Tiffany N. Provence, Esquire  
Edward G. R. Bennett, Esquire

**HOOD  
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10/17/2016

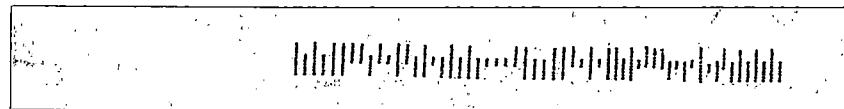
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**The Honorable Jenny Abbott Kitchings**  
Clerk, South Carolina Court of Appeals  
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