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Appeal from Charleston County
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity

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OCT 10 2016

CASE NO. 2014-CP-10-5608
APPELLATE CASE 2016-000886

SC Court of Appeals

James Bradley Williams and Robert Blair Kline, Jr.,.....Appellants,

v.

Merle S. Tamsberg,.....Respondent.

SUPPLEMENTAL RECORD ON APPEAL

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Deposition Transcript

Transcript of James Williams' Deposition, page 14:7-15181
Certificate of Counsel184

1 STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON) NINTH JUDICIAL CIRCUIT

2 James Bradley Williams and)
3 Robert Blair Kline, Jr.,)
4 Plaintiffs,)
5) Case No.:
6 v.) 2014-CP-10-5608
7 Merle S. Tamsberg,)
8 Defendant.)

9 DEPOSITION OF: JAMES BRADLEY WILLIAMS
10 DATE TAKEN: Thursday, November 5, 2015
11 TIME: 10:00 A.M.
12 PLACE: Moore & Van Allen
13 78 Wentworth Street, Suite 200
Charleston, South Carolina
14 REPORTED BY: MARY ANN RIDENOUR, RPR, CLR
15 Registered Professional Reporter,
16 Certified LiveNote Reporter
and Notary Public

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1 know more than that or not.

2 Q. Okay. Do you know if y'all always went
3 together or sometimes you went without Rob or --

4 A. We would have gone together.

5 Q. Okay.

6 A. Uh-huh.

7 Q. Do you remember when you first became aware
8 that the property was encumbered by this easement?

9 A. It was early on.

10 Q. Okay.

11 A. It may have been the first day we saw it.

12 Q. Okay.

13 A. We knew that there was an easement involved
14 in the past or present, or whatever. But, no, we were
15 aware of it.

16 Q. Okay. Do you remember, I guess, around the
17 time that you discovered there was an easement on the
18 property, do you remember any conversations with
19 Ruthie, or what was your understanding of the easement
20 pre-purchase?

21 A. That it -- there was an easement. We -- I
22 think she explained to us the property layout, which
23 was our house was an in-fill house built on the front
24 yard of Number 47. 47 agreed to sell it, with the
25 understanding they could use the driveway to get to

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CERTIFICATE OF COUNSEL

I hereby certify that the Supplemental Record on Appeal contains all material proposed to be included by any of the parties to this appeal and not any other material.

October 4, 2016



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PROOF OF SERVICE

I do hereby certify that on the 4th day of October 2016, I served a copy of the within
Supplemental Record on Appeal in the within entitled matter by sending a copy of the same in an
envelope with the correct postage prepaid addressed to:

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