

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2012-CP-10-6835

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MAR 13 2017

SC Court of Appeals

Joanne S. Reed,.....Appellant

vs.

Harold Salters, Johnnie Salters, Darrel Martin, Sametta Heyward, James Salters, Charles Tyler, Margerette Brown, Danny Tyler, Joseph Tyler, Calvin Tyler, Willie Washington, David Tyler, George Grant, Olivia Heyward, Lisa Canady, Sylvia Grant Heyward, Janis Magwood, Tatum Grant, Abraham Grant, III, Lillian Sanders, Latricia Sanders-Roberts, Mary Sanders, Martha Sanders, Ruthie Mae Sanders Butler, Elizabeth Sanders, Georgiana S. Stone, Sandra S. Brown, Carolyn S. Hissong, George Sanders, Jr., William Sanders, Althea Salters, Sam Wes, Matthew Sanders, Eddie Sanders, JOHN DOE AND MARY ROE fictitious names representing unknown minors, incompetents, persons in the military service within the meaning of Title 50, United States Code, commonly referred to as The Service Members Civil Relief Act of 2003, persons imprisoned, and persons under any other legal disability and RICHARD ROE and JANE DOE, fictitious names representing unknown heirs, devisees, distributes, or personal representatives of the following deceased persons The Estate of John Salters, Viola Salters, Evelina Salters Sanders, Christina Salters, Wesley Salters, Lula Salters, Dorthy Salters, James Salters, Mary Salters-Tyler, Josephine Salters, Vermel Martin, Sam Heyward, Helen Tyler, Henrietta Sanders Grant, Abraham Grant, Abraham Grant, Jr., Eddie Sanders, George Leroy Sanders, Dorothy S. Heyward,

of Whom

Jesse Townsend, Jr. a/k/a Jessie M. Townsend, Jr.....Respondent.

APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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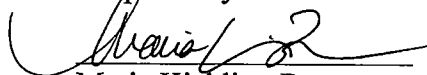
Maria Kiehling Brees  
S.C. Bar No. 76799  
McGee Law Firm, LLC  
105 Wappoo Creek Drive, Suite 1-B  
Charleston, SC 29412  
(843) 724-7707

The Appellant proposes the following items to be included in the Record on Appeal:

1. Order of the Honorable Mikell R. Scarborough, dated December 23, 2015;
2. Order of the Honorable Mikell R. Scarborough, dated March 10, 2016;
3. Order of the Honorable Mikell R. Scarborough, dated July 14, 2016;
4. Summons and Complaint dated October 9, 2012;
5. Amended Summons and Complaint dated June 28, 2013;
6. Answer to Amended Complaint of the Defendant Althea Salters dated September 9, 2013;
7. Answer of Defendant Irene Townsend Hodges dated October 29, 2013
8. Answer of Defendant Jessie Townsend dated October 29, 2013;
9. Answer of Defendant Jestine Graham Townsend dated October 29, 2013;
10. Answer of Defendant Mary Alice Townsend Morrison dated October 29, 2013;
11. Answer of Defendant Irma Townsend dated October 29, 2013;
12. Answer of Defendant Karen Waters dated October 29, 2013;
13. Answer and Counterclaim of Defendant Jesse Townsend dated December 8, 2014;
14. Plaintiff's Affidavit of Default as to certain Defendants dated August 17, 2015;
15. Defendant Jessie Townsend's Motion to Reconsider Order dated January 20, 2016;
16. Plaintiff's Memo in Opposition to Defendant's Motion to Reconsider Order dated March 10, 2016;
17. Plaintiff's Motion to Reconsider dated July 25, 2016;
18. Defendant Jessie Townsend's Objection to Motion to Reconsider dated October 11, 2016;
19. Plaintiff's Memo in support of Motion to Reconsider dated October 11, 2016;
20. Plaintiff's Motion to Reconsider Denied dated November 3, 2016;
21. Notice of Appeal, dated November 18, 2016;
22. Certificate of Death of John Salters dated March 20, 1926;
23. United States Census Report dated the year of 1880;
24. United States Census Report dated the year of 1920;
25. Transcript of the August 17, 2015 trial proceedings;
26. Transcript of the May 2, 2016 trial proceedings;

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted



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Charleston, South Carolina  
March 8, 2017

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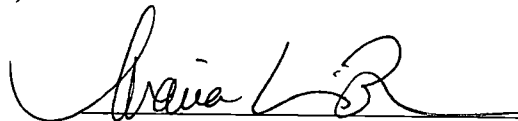
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of Whom

Jesse Townsend, Jr. a/k/a Jessie M. Townsend, Jr.....Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that a true copy of the Appellant's Initial Brief has been served upon D. Nathan Davis, Esq., Davis Law SC, 12 Carriage Lane, Suite A, Charleston, South Carolina, 29407, and upon Kelvin M. Huger, Esq., Counts & Huger, 27 Gamecock Avenue #200, Charleston, South Carolina, 29407, by United States Mail, first class, postage prepaid on the 8th day of March, 2017.

A handwritten signature in cursive script, appearing to read "Maria Kiehling Brees", written over a horizontal line.

Maria Kiehling Brees  
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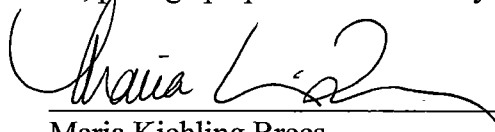
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The undersigned hereby certifies that a true copy of the Appellant's Designation of Matter to Be Included in the Record on Appeal has been served upon D. Nathan Davis, Esq., Davis Law SC, 12 Carriage Lane, Suite A, Charleston, South Carolina, 29407, and upon Kelvin M. Huger, Esq., Counts & Huger, 27 Gamecock Avenue #200, Charleston, South Carolina, 29407, by United States Mail, first class, postage prepaid on the 8th day of March, 2017.



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