

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
S. JACKSON KIMBALL, SPECIAL CIRCUIT COURT JUDGE  
Case No. 2015-CP-46-01409  
Appellate Case No.: 2016-001921

IN RE:

Deborah Dereede Living Trust dated  
December 18, 2013

Hugh Dereede and Tyre Dealer Network  
Consultants, Inc., ..... Respondents,

v.

Courtney Feeley Karp, Individually and  
As Trustee of the Deborah Dereede Living  
Trust dated December 19, 2013 and Michael  
Fehily, as a qualified beneficiary of the  
Deborah Dereede Living Trust dated  
December 18, 2013, ..... Defendants,

Of which

Courtney Feeley Karp, Individually and  
As trustee of the Deborah Dereede Living  
Trust dated December 19, 2013 is the, ..... Appellant.

**RECEIVED**

JUN 28 2017

SC Court of Appeals

**APPELLANT’S REPLY DESIGNATIONS**

Pursuant to Rule 209, SCACR, Appellant proposes the following be included in the Record on Appeal. Unless otherwise stated, all items designated include exhibits and exclude proof of

service, cover sheets, motion forms, and notices. Appellant reserves the right to include additional designations in connection with her initial reply brief or otherwise.

### **ORDERS**

1. Order appointing trust protector

### **TRANSCRIPTS**

2. Tr. P. 6 – 80
3. Tr. P. 94, line 4
4. Tr. Pp. 104, line 3- p. 105, line 18
5. Tr. Pp. 105, line 25 – p. 106, line 13
6. Tr. Pp. 106, line 21 – p. 107, line 1)
7. Tr. Pp. 111, line 23 – p. 112, line 2
8. Tr. Pp. 112, line 20 – p. 113, line 14
9. Tr. P. 115, Lines 1-21
10. Tr. P. 116, lines 9 – 16
11. Tr. P. 122, lines 15-18
12. Tr. Pp. 123, line 7 – p. 124, line 14
13. Tr. Pp. 129, line 5- p. 130, line 24
14. Tr. Pp. 131, line 4 – p. 132, line 6
15. Tr. P. 152, lines 1-9
16. Tr. P. 181, lines 3-5
17. Tr. P. 241, line 4 – 9

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

Respectfully submitted,

A handwritten signature in cursive script that reads "Desa Ballard" followed by a horizontal line and the initials "by H.M.W." written below it.

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ATTORNEYS FOR APPELLANT

June 26, 2017

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
S. JACKSON KIMBALL, SPECIAL CIRCUIT COURT JUDGE  
Case No. 2015-CP-46-01409  
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Of which

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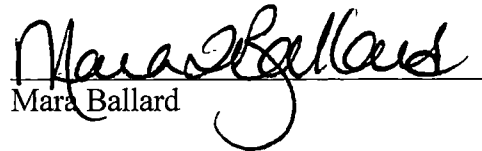
CERTIFICATE OF SERVICE

I, Mara Ballard, an employee with Ballard & Watson, Attorneys at Law, do hereby certify that on June 26, 2017, I served a copy of the **Appellant's Initial Reply Brief** and **Appellant's Reply Designation of Matter** in the above-captioned case on the following individuals by

electronic mail and by standard US Mail, with sufficient first-class postage affixed, addressed as follows:

**John Gettys, Jr., Esquire**  
**john.gettys@mortongettys.com**  
**Morton & Gettys, LLC**  
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Mara Ballard

June 26, 2017  
West Columbia, South Carolina



**Ballard & Watson**  
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PERSISTENT. UNWAVERING.

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June 26, 2017

Via U.S. Mail

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *Deborah Dereed Living Trust v. Courtney Feeley Karp, et al.*  
Appellate Case No: 2016-001921

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JUN 28 2017  
SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of the **Appellant's Initial Reply Brief** in the above-referenced matter. Also enclosed are an original and one copy of **Appellant's Reply Designation of Matter** pursuant to Rule 209, SCACR. After both have been filed, please return the clocked copies to our office in the enclosed, self-addressed, stamped envelope.

Please do not hesitate to contact our office if you should have any questions. With warm personal regards, I am,

Sincerely yours,

Desa Ballard  
[desab@desaballard.com](mailto:desab@desaballard.com)

cc: Via U.S. Mail and Email  
John Gettys, Jr., Esquire  
Dan Ballou, Esq.  
Via Email  
Pete Nosal, Esquire  
Courtney Feeley Karp, Esq.

FIRST CLASS MAIL



*Law Offices of Desa Ballard*

226 State Street  
West Columbia, SC 29169

**To:**  
Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211