

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
JUL 18 2017
SC Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Honorable Craig D. Brown, Presiding Judge

Appellate Case No. 2015-001941

Elizabeth J. LangleyAppellant

v.

Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch II, Donald Jordan III, Jimmy White, and S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch,

Of whom Wendy J. Lynch is this.....Respondent:

MOTION TO RECALL THE REMITTITUR

I Elizabeth Langley request the Court of Appeals to change their decision and recall the Remittitur due to the fact Attorney J. Rene Josey didn't relieve himself immediately by filing a timely Motion to be relieved as counsel, with the Court of Appeals. Mr. Josey should have filed the Motion on June 1,2017 the day he notified me that he didn't have time to do the reconsideration. If the motion to be relieved had been filed by him at that time, then the court would have given me enough time to find a New Appellate attorney. He said he simply didn't have time to file a Reconsideration. {see exhibit A} His actions or non actions prevented the Court from allowing my Reconsideration filing by Pro Se, which was filed in a timely manner, by the June 8,2017 deadline. After this deadline Mr. Josey filed a Motion to recall the Remittitur and a Motion to be relieved as counsel on June 13, 2017, only after I filed reconsideration as

Pro Se in an attempt to save the appeal. I didn't ask for Mr. Josey to be relieved as counsel, he simply said he didn't have time to file the reconsideration. Also, his actions or non actions, didn't allow enough time to find a New Attorney that was capable of handling a case in the Court of Appeals so thats why I filed Pro Se in an attempt to save the appeal . Mr. Josey left me in the midst of an Appeal causing extreme prejudice to my case. ^{1 2 3 4}

(signature page to follow)

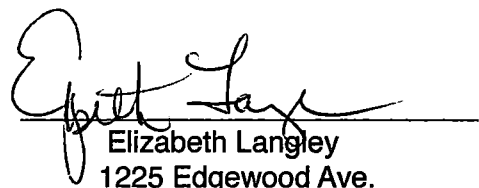
¹ See motion for extension of time, see motion for reimbursement of attorney fee.

² SCRule 264 (B) Withdrawal: An Attorney of record in a matter pending before the appellate court may not withdraw from representation of his client without justifiable cause, or the consent of his client, on petition to and by written order of the appellate court, and with notice to the adverse party.

³ refer to previous filed Motion by J.Rene Josey June 13, 2017 Motion to recall Remittitur, Motion to be relieved as counsel.

⁴ See exhibits attached: A) copy of emails , B) contract with Rene Josey and C) paid checks to Rene Josey/ Turner Padget

July 18, 2017

A handwritten signature in black ink, appearing to read "Elizabeth Langley", written over a horizontal line.

Elizabeth Langley
1225 Edgewood Ave.
Florence, South Carolina 29501
PHONE: 843-615-5918
Email: Elizalangley@aol.com

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- 1) EXHIBIT A: EMAILS CORRESPONDENCE WITH RENE JOSEY ATTORNEY FOR ELIZABETH LANGLEY. ROA 1-19
- 2) EXHIBIT B: CONTRACT WITH RENE JOSEY ATTORNEY FOR ELIZABETH LANGLEY ROA 20-21.
- 3) EXHIBIT C: PAYMENTS TO RENE JOSEY /TURNER PADGET ROA 22-25.

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SC Court of Appeals


Exhibit

A

RECEIVED

JUL 18 2017

SC Court of Appeals

From: Josey, J. Rene JJosey@TurnerPadget.com 
Subject: Disappointing Decision from Court of Appeals
Date: May 26, 2017 at 12:33 PM
To: elizalangley@aol.com
Cc: Josey, J. Rene JJosey@TurnerPadget.com



I just received the attached decision in this morning's mail from the SC Court of Appeals.

I thought it best to share with you immediately rather than risk you learning of it from your sister.

To summarize the 12 page decision, the Court concluded that too little was presented to the trial judge to warrant a trial.

Further appeal efforts are possible, including Petitioning the Court of Appeals for a rehearing, and then Petitioning the South Carolina Supreme Court for consideration.

I do not recommend these further efforts as I do not believe they would be successful.

I am sorry to have this disappointing news although we knew it was an uphill effort. I will be happy to meet with you next week to discuss – just let me know if you want to – and what day/time might work.

Rene'

Turner | Padget

J. Rene Josey
Attorney
PO Box 5478 | Florence, SC 29502
319 South Irby Street | Florence, SC 29501
843-656-4451 | Fax 843-413-5818
jjosey@turnerpadget.com
[Bio](#) | [vCard](#) | [Location](#)



RoA 1

From: Elizabeth Langley elizalangle@aol.com
Subject: Re: Disappointing Decision from Court of Appeals
Date: May 26, 2017 at 1:15 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



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jjosey@turnerpadget.com
[Bio](#) | [vCard](#) | [Location](#)

<doc03094920170526112212.pdf>

From: **Elizabeth Langley** elizalangle@aol.com
Subject: Re: Disappointing Decision from Court of Appeals
Date: May 26, 2017 at 1:38 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



Can u call me

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<doc03094920170526112212.pdf>

ROA 3

From: Josey, J. Rene JJosey@TurnerPadget.com
Subject: RE: Disappointing Decision from Court of Appeals
Date: May 26, 2017 at 3:05 PM
To: Elizabeth Langley elizalangle@aol.com
Cc: Josey, J. Rene JJosey@TurnerPadget.com



Our appeal has been an effort to get a “trial” since the summary judgment decision denied you a trial. The appeal decision means there can be no “trial.”

Petitioning for Rehearing and then Petitioning the Supreme Court would require an estimated \$5,000 more – and I don’t recommend you spend that money. Any Petition for rehearing would have to be done and received by the Court of Appeals by June 8th (15 days after the May 24th decision).

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From: Elizabeth Langley [mailto:elizalangle@aol.com]
Sent: Friday, May 26, 2017 1:15 PM
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Subject: Re: Disappointing Decision from Court of Appeals

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Rene’

J. Rene Josey
Attorney

RoAY

From: **Elizabeth Langley** elizalangley@aol.com
Subject: Re: Disappointing Decision from Court of Appeals
Date: May 26, 2017 at 3:30 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



I talking about petitioning the civil court for new trial to start from scratch on the grounds the attorney jim Irvin left out important evidence... my deposition and affidavit and other pertinent affidavits and depositions .. he didn't depose any of my witnesses

On May 26, 2017, at 3:03 PM, Josey, J. Rene <JJosey@TurnerPadget.com> wrote:

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From: Elizabeth Langley elizalangle@aol.com
Subject: Re: Disappointing Decision from Court of Appeals
Date: May 26, 2017 at 3:36 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



I was the one living with my daddy from before he got sick Jan 2012 til wendy locked me out in dec 2012 .. she wasn't living there and the facts are wrong ... in the appeals records

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ROA 6

From: **Elizabeth Langley** elizalangley@aol.com
Subject: Re: Disappointing Decision from Court of Appeals
Date: June 1, 2017 at 12:28 PM
To: **Josey, J. Rene** JJosey@TurnerPadget.com



I'm not sure ☹️ if I can get anyone this short notice.. but I think we could have a chance to get it overturned if we argued the pertinent points.. disputed her claims of living with my father.. I was living there 1/2012 until she locked me out.. never moved anything but a few overnight bags..and she only staying there when she locked me out.. and changed locks refused to give me a key to my own bedroom and house.. in December 2012... daddy would stay with Quinn some but I was helping and they would stay at his house too.. he didn't move a thing but a overnight bag of clothes.. to Quinns.. spent days in Timmonsville with me and Quinn and some nights with her from 6/2012-10/2012 ... wendy wasn't even helping with daddy then she made daddy choose between her or Quinn..

... disputing the misinterpretation of Wendy's own text message.. it's what the text message says " he has not been competent since Dx (diagnosis) , biopsy seizures , radiation... (this means from the very beginning) the will was done 3 weeks after diagnosis.. the fact that the will had may 10 th / 11 th means they went there twice and or Rick changed date it was not initialed by anyone.. I was there on the 10 th only to give my daddy a ride back home and stay with him afterwards because he couldn't drive or be alone... I didn't go to ricks office for any other reason..

wendy drove him there.. said they were just going to talk to Rick. She asked me to pick up daddy she couldn't take him home.. (I told her that if she is taking daddy up there to make a will daddy doesn't have capacity to make a will) she said they were going up there just to talk to Rick ... so she conspired to do a will / behind my back and I was Dpoa had 50% right to decide what happened to my dads estate.. she was the one who took daddy up there and she is the one who made the list.. and used her attorney... so she conspired ... she stayed in waiting room entire time with me.. rick comes out and said daddy had drink with him and talked about my brother and his morgan silver dollar collection ... so to me rick hide the fact also.. he should have discussed all of the paper work with me that included me..

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<doc03094920170526112212.pdf>

20A 8

From: **Elizabeth Langley** elizalangley@aol.com
Subject: Re: Disappointing Decision from Court of Appeals
Date: June 1, 2017 at 12:44 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



Also the fact the ruling said will was fair.. it isn't how can 102 acres worth millions that joins Honda .. be equal to 30 acres on 76 Hwy... it's only with about 2000.00 acre...

how can she getting the lake house solely be fair? She never hardly used it.. I was the one there the most..
It's worth at least \$400,000...

The 2 parcels becky got are worth about 7500 each..

the lease purchase is not a house we get once payments are complete (only a few years left) transfers to the mcfaddens..

The 102 acres has the cement lease on it get 22000.00 yearly.. she will get that..
the will isn't fair.. there's no way anyone should come to that conclusion

On Jun 1, 2017, at 12:28 PM, Elizabeth Langley <elizalangley@aol.com> wrote:

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<doc03094920170526112212.pdf>

RoA 10

From: **Josey, J. Rene** JJosey@TurnerPadget.com
Subject: RE: Can u get my documents files I left with you .. I'll pick up tomorrow or Monday... thanks
Date: June 1, 2017 at 4:52 PM
To: Elizabeth Langley elizalangley@aol.com
Cc: Josey, J. Rene JJosey@TurnerPadget.com



I am mailing you the attached letter today – just confirming our phone call.

You have about 4 boxes of documents.

Turner | Padget

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From: Elizabeth Langley [<mailto:elizalangley@aol.com>]
Sent: Thursday, June 1, 2017 3:04 PM
To: Josey, J. Rene
Subject: Re: Can u get my documents files I left with you .. I'll pick up tomorrow or Monday... thanks

Ok thank u

On Jun 1, 2017, at 2:56 PM, Josey, J. Rene <JJosey@TurnerPadget.com> wrote:

I can have your documents ready. The stuff that made it into the trial court (before Judge Brown) is also in the 200 page scan I sent you.

I think the silver haired attorney you may be thinking of is Tommy Brittain.

Turner | Padget

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To: Josey, J. Rene
Subject: Can u get my documents files I left with you .. I'll pick up tomorrow or Monday... thanks

ROA 11

Turner | Padget

REPLY TO:

J. René Josey

E-Mail: RJosey@TurnerPadget.com
Writer's Direct Dial: (843) 656-4451
Writer's Direct Fax: (843) 413-5818

June 1, 2017

Via Email and U.S. Mail

Ms. Elizabeth Langley
1225 Edgewood Avenue
Florence, SC 29501

Re: Langley v. Lynch, et al.
TP File No.: 13799.101

Dear Beth:

This will confirm that I have emailed you all relevant appeal documents – including the 200 page Record Appeal. These documents (all briefs, the record, and the decision) are all that would be needed by any new attorney to prepare a Petition for Rehearing.

Again, Rule 221 establishes a hard-deadline (that cannot be extended) for Petitions for Rehearing – and the hard 15 day deadline in this case requires that any such Petition by you be received at the Court of Appeals (and served on opposing counsel) by next Thursday, June 8th. As you know, you acknowledged my first email advising you of this deadline on May 26th.

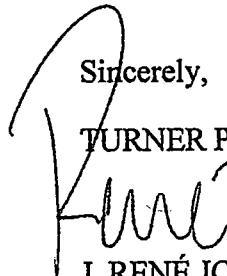
As we discussed, my schedule simply does not allow me to prepare a Petition. I also think that if you choose to do a Petition, a new attorney perspective could prove helpful. Again, most such Petitions are denied – even though you have observed some errors in the Court decision (like the failure to focus on the content of the text message).

As we also discussed, there is no mechanism for collateral attack of a civil case outcome although you can sue for damages if you think it was caused by another's negligence.

You may pick up the few remaining documents from your original file that have not previously been returned. I anticipate closing my file now. I wish you the best of luck in your future endeavors – and with your knee.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.



J. RENÉ JOSEY

ReA 12

From: **Elizabeth Langley** elizalangle@aol.com
Subject: Appeal
Date: June 3, 2017 at 8:08 PM
To: J. Rene Josey JJosey@TurnerPadget.com



I don't think that it's right for you not to do the appeal... and follow thru til the end ... know how hard it is to get an attorney to do this and I only have till the eighth so I just think that's not right that you don't have time to do it.. you knew that the deadline was on the 8th and I did email you the mistakes and errors that were filed , some of them and I'm sure there's more and I did call you you should have let me know you couldn't do it at the very beginning... when you received the info..

POA 13

From: Elizabeth Langley elizalangley@aol.com
Subject: Re: Reconsideration court of appeals
Date: June 12, 2017 at 4:56 PM
To: J. Rene Josey JJosey@TurnerPadget.com



Asap

On Jun 12, 2017, at 4:50 PM, Elizabeth Langley <elizalangley@aol.com> wrote:

this is Beth I filed the reconsideration motion in the Court of Appeals myself on Thursday they're saying that you have to relieve yourself from representing me and both civil court and the appeals court and I need that done today I paid you \$35,000 and you drop the ball at the end of this and it is not right to me you know what I am very upset about this y'all have done a number on us this whole Florence County .. I need you to call me please

ROA 14

From: Josey, J. Rene JJosey@TurnerPadget.com
Subject: RE: Reconsideration court of appeals
Date: June 12, 2017 at 5:28 PM
To: Elizabeth Langley elizalangle@aol.com
Cc: Josey, J. Rene JJosey@TurnerPadget.com



Beth,

I will file a motion to be relieved in the Court of Appeals tomorrow and send you a copy. I was not aware that you were filing the Petition for Rehearing until after it was done. I will also call the Court in the morning to tell them that it is on the way.

I know you are frustrated with the result – but it is not my fault. We filed a colorable appeal with what was available from the Record. I gave you notice the day I received the Court of Appeals decision and you acknowledged receipt that same day.

As the Court probably advised you when you filed your *pro se* Petition, Joe McCulloch's office has filed a motion for costs which is automatically given to those who prevail on appeal under Rule 222(a).

Rene'

-----Original Message-----

From: Elizabeth Langley [mailto:elizalangle@aol.com]
Sent: Monday, June 12, 2017 4:50 PM
To: Josey, J. Rene
Subject: Reconsideration court of appeals

this is Beth I filed the reconsideration motion in the Court of Appeals myself on Thursday they're saying that you have to relieve yourself from representing me and both civil court and the appeals court and I need that done today I paid you \$35,000 and you drop the ball at the end of this and it is not right to me you know what I am very upset about this y'all have done a number on us this whole Florence County .. I need you to call me please

POA 15

From: Elizabeth Langley elizalangley@aol.com
Subject: Re: Reconsideration court of appeals
Date: June 12, 2017 at 5:53 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



You know I didn't want you to be relieved I wanted you to file reconsideration on appeal but you didn't tell me you couldn't do it until the Thursday or Friday before it was due the following Thursday so it left me no choice but to try to do it on my own and Greg said he was going to do it but he didn't say anything about him getting you relieved and you didn't say thing about having to be relieved. I mean seems like you would told me or Greg that

On Jun 12, 2017, at 5:26 PM, Josey, J. Rene <JJosey@TurnerPadget.com> wrote:

Beth,

I will file a motion to be relieved in the Court of Appeals tomorrow and send you a copy. I was not aware that you were filing the Petition for Rehearing until after it was done. I will also call the Court in the morning to tell them that it is on the way.

I know you are frustrated with the result – but it is not my fault. We filed a colorable appeal with what was available from the Record. I gave you notice the day I received the Court of Appeals decision and you acknowledged receipt that same day.

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From: Elizabeth Langley [<mailto:elizalangley@aol.com>]
Sent: Monday, June 12, 2017 4:50 PM
To: Josey, J. Rene
Subject: Reconsideration court of appeals

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I need you to call me please

RoA 16

From: Elizabeth Langley elizalangley@aol.com
Subject: Re: Reconsideration court of appeals
Date: June 12, 2017 at 5:59 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



No the I did not say anything about joe mcculloch asking for reimbursement of his fees. And how much would that be.

On Jun 12, 2017, at 5:53 PM, Elizabeth Langley <elizalangley@aol.com> wrote:

You know I didn't want you to be relieved I wanted you to file reconsideration on appeal but you didn't tell me you couldn't do it until the Thursday or Friday before it was due the following Thursday so it left me no choice but to try to do it on my own and Greg said he was going to do it but he didn't say anything about him getting you relieved and you didn't say thing about having to be relieved. I mean seems like you would told me or Greg that

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As the Court probably advised you when you filed your *pro se* Petition, Joe McCulloch's office has filed a motion for costs which is automatically given to those who prevail on appeal under Rule 222(a).

Rene'

-----Original Message-----

From: Elizabeth Langley [mailto:elizalangley@aol.com]
Sent: Monday, June 12, 2017 4:50 PM
To: Josey, J. Rene
Subject: Reconsideration court of appeals

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I need you to call me please

RoA 17

From: **Josey, J. Rene** JJosey@TurnerPadget.com
Subject: RE: Reconsideration court of appeals
Date: June 12, 2017 at 6:08 PM
To: Elizabeth Langley elizalangle@aol.com
Cc: Josey, J. Rene JJosey@TurnerPadget.com



The costs are restricted by Appellate Court Rule to \$1000 in fees plus transcript/printing charges – the total he presented is \$1,094.00.

Turner | Padget

J. Rene Josey
Attorney
PO Box 5478 | Florence, SC 29502
319 South Irby Street | Florence, SC 29501
843-656-4451 | Fax 843-413-5818
jjosey@turnerpadget.com
[Bio](#) | [vCard](#) | [Location](#)

From: Elizabeth Langley [mailto:elizalangle@aol.com]
Sent: Monday, June 12, 2017 6:00 PM
To: Josey, J. Rene
Subject: Re: Reconsideration court of appeals

No the I did not say anything about joe mcculloch asking for reimbursement of his fees. And how much would that be.

On Jun 12, 2017, at 5:53 PM, Elizabeth Langley <elizalangle@aol.com> wrote:

You know I didn't want you to be relieved I wanted you to file reconsideration on appeal but you didn't tell me you couldn't do it until the Thursday or Friday before it was due the following Thursday so it left me no choice but to try to do it on my own and Greg said he was going to do it but he didn't say anything about him getting you relieved and you didn't say thing about having to be relieved. I mean seems like you would told me or Greg that

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As the Court probably advised you when you filed your *pro se* Petition, Joe McCulloch's office has filed a motion for costs which is automatically given to those who prevail on appeal under Rule 222(a).

Rene'

RoA 18

From: Elizabeth Langley elizalangle@aol.com
Subject: Re: Motion to Be Relieved
Date: June 13, 2017 at 1:42 PM
To: Josey, J. Rene JJosey@TurnerPadget.com



I'm at beach can u fax it and let me sign

On Jun 13, 2017, at 1:11 PM, Josey, J. Rene <JJosey@TurnerPadget.com> wrote:

Beth,

I talked to the Court and things are complicated because I did not know you were going to file on your own – until after you did it.

I am preparing a motion asking the court to “recall” its transmission of the case back to trial court – so that it can then relieve me and consider your Petition.

It might help if you sign your agreement to these motions – are you available later today to come by and sign?

Rene'

Turner | Padget

J. Rene Josey
Attorney
PO Box 5478 | Florence, SC 29502
319 South Irby Street | Florence, SC 29501
843-656-4451 | Fax 843-413-5818
jjosey@turnerpadget.com
[Bio](#) | [vCard](#) | [Location](#)

RoA 19

Exhibit B

RECEIVED

JUL 18 2017

SC Court of Appeals

Turner | Padget

REPLY TO:

J. René Josey

E-Mail: RJosey@TurnerPadget.com
Writer's Direct Dial: (843) 656-4451
Writer's Direct Fax: (843) 413-5818

September 4, 2015

VIA HAND-DELIVERY

Ms. Elizabeth Langley

~~3331 West Forest Lake Drive~~ 1225 Edgewood Ave.
Florence, South Carolina 29501

Re: Appeal of Summary Judgment in Elizabeth J. Langley v. Wendy J. Lynch, et. Al.
Case No.: 2013-CP-21-01408
TPGL File No.: pending

Dear Ms. Langley:

This will confirm that I have agreed to represent you with regard to the above-referenced matter. This letter sets forth our fee arrangement, including a brief general description of the services to be rendered, the staffing which may be necessary to provide these services, and our billing policies and practices.

This will also confirm my receipt of \$20,000, of a needed \$30,000 total deposit, which has been deposited into our trust account. I will charge my time and expenses against all such deposits until they are exhausted or the appeal is completed. While we will file the notice of appeal and order the needed transcript based upon the initial deposit, the additional \$10,000 will need to be paid into our trust account by the end of September in order to secure the preparation of appellate briefs; without full payment, our firm reserves the right to seek withdrawal from your representation. As we have discussed, the \$30,000 deposit is based upon the estimate of time required for the first appeal from Circuit Court; it does not include any estimate of fees for any subsequent trial or representation with regard to probate administration – we will be happy to assist you with those matters but will need to reach a separate fee agreement in that regard.

At this time, I expect to be the only attorney involved in this matter; however, depending upon the circumstances, associate attorneys, paralegals and law clerks may be called upon to provide services or to accomplish certain tasks. In an effort to provide high quality services at a reasonable cost, we use associate and paralegal support where appropriate to accomplish various tasks at a lesser charge to the client.

This firm's fee structure is based upon hourly rates for all attorneys, paralegals and law clerks unless otherwise specified. All attorneys, paralegals and law clerks record time expended on hourly fee matters in increments of one-tenth of an hour, which serves as the basis for the hourly charges. Our hourly rates on this matter will be billed according to the following rates:

J. René Josey	\$300
Associate Attorneys	\$225
Paralegals/Law Clerks	\$125

TURNER PADGET GRAHAM & LANEY P.A.

Columbia | Charleston | Greenville | Florence | Myrtle Beach

www.turnerpadget.com P 843-662-9008 F 843-667-0828
319 South Irby St. (29501) | P.O. Box 5478, Florence, SC 29502

RoA 20

Turner | Padget

Elizabeth Langley
September 4, 2015
Page 2

Statements for services rendered will generally be submitted monthly, generally by the third week of the month for the preceding month, to more effectively monitor time and expenses as they are incurred. In the event the initial deposit is exhausted, payment for services rendered is due upon receipt of the statement, and it should be made payable to Turner, Padget, Graham & Laney, P.A. We will charge 1.5% interest per month on all unpaid balances which exist after ninety (90) days. In criminal matters such as this, we reserve the right to require an additional deposit toward fees. If this is required, we will discuss it with you at that time.

With regard to additional charges for expenses incurred on your behalf, it is the firm's practice to itemize charges advanced on the monthly statement. These charges include the following items: copying charges, fax service, postage, delivery charges, telephone long distance charges, computerized legal assistance research (Lexis/Nexis), travel charges and mileage, and other miscellaneous charges for items which will appear along with the description on the bill. Unless otherwise specified, all vendor expenses over \$100 will be passed directly on to you, rather than included on the bill.

If the foregoing correctly sets forth your understanding of the terms of our engagement, please so indicate by dating, signing and mailing this letter back to us in the self-addressed stamped envelope provided.

We look forward to being of service to you, and will welcome your comments as to how we can improve or modify our delivery of services to better suit your needs.

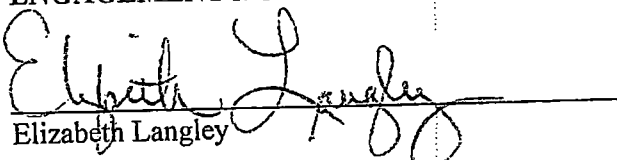
Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

J. René Josey

JRJ:

ENGAGEMENT AGREED TO AS SET FORTH ABOVE.


Elizabeth Langley

9-4-2015
Date

ROA 21

RECEIVED

JUL 18 2017

SC Court of Appeals

Exhibit C

Elizabeth A Langley
PH 843-615-6918
1225 Edgewood Ave.
Florence, SC 29501

2451
67-800/532

9-4-2015
DATE

PAY TO THE
ORDER OF

Jimmy Podgett

\$20,000.00

Twenty thousand & no/100

DOLLARS

Security features
included.
Check on back.

Hometown Heroes

FIRST RELIANCE
BANK

MEMO

Appeal Probate

Elizabeth A Langley MP

⑆053208008⑆014000267921⑆2451

TRADITIONAL BLUE

20A 22

Elizabeth A Langley
PH 843-615-6918
1225 Edgewood Ave.
Florence, SC 29501

CHECK HERE IF TAX
DEDUCTIBLE ITEM

2459

67-800/532

BAL.
FOR'D

THIS ITEM

BALANCE
DEDUCTIONS/
DEPOSIT

BAL.
FOR'D

FIRST RELIANCE
BANK



NOT NEGOTIABLE

Elizabeth A Langley
PH 843-615-6918
1225 Edgewood Ave.
Florence, SC 29501

CHECK HERE IF TAX
DEDUCTIBLE ITEM

2451

67-800/532

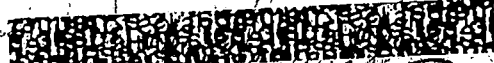
BAL.
FOR'D

THIS ITEM

BALANCE
DEDUCTIONS/
DEPOSIT

BAL.
FOR'D

FIRST RELIANCE
BANK



NOT NEGOTIABLE

ROA 23

Elizabeth A Langley
PH: 843-615-6918
1225 Edgewood Ave.
Florence, SC 29501

CHECK HERE IF TAX
DEDUCTIBLE ITEM

2492

67-800/532

1-12-2010

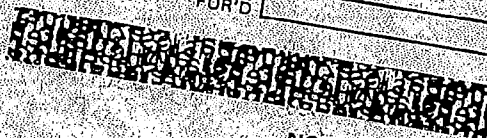
FIRST RELIANCE
BANK

BAL.
FOR'D

THIS ITEM

BALANCE
DEDUCTIONS/
DEPOSIT

BAL.
FOR'D



NOT NEGOTIABLE

RoA 24

MONEY RECEIPT

DATE: 5-9-17 NO: 028031
RECEIVED FROM: Elizabeth Langley
ADDRESS: 225 Edgewood Ave, Florence SC 29501
CHECK # 2567 DOLLARS \$ 1344.20

FOR: Rene Josey

ACCOUNT		HOW PAID	
Amt. of Acct.	<u>1344.20</u>	Cash	
Amt. Paid		<input checked="" type="checkbox"/> Check	<u>2567</u>
Balance Due		Money Order	

BY: C Foman

81604 (2001 REDFORM) 060701

ROA 25

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

JUL 18 2017

SC Court of Appeals

Honorable Craig D. Brown, Presiding Judge

Appellate Case No. 2015-001941

Elizabeth J. LangleyAppellant

v.

Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch II, Donald Jordan III, Jimmy White, and S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch,

Of whom Wendy J. Lynch is this.....Respondent.

PROOF OF SERVICE

I certify this 18th day of July 2017 that I have served copies of the MOTION FOR EXTENTION OF TIME , MOTION TO RECALL THE REMITTITUR TO JOE MCCULLOCH AND RENE JOSEY AND THE MOTION FOR REIMBURSEMENT OF ATTORNEY'S FEES TO RENE JOSEY ONLY, by mailing same, postage prepaid in the United States mail, addressed to the following:

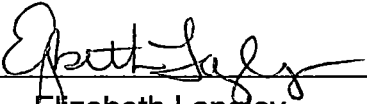
Joseph M. McCulloch, Jr., Esquire
Kathy R. Schillaci, Esquire
Law Offices of Joseph M. McCulloch, Jr.
Post Office Box 11623
Columbia, SC 29211

J. Rene Josey, Esquire
Post Office box 5478 (29502)
Turner Padgett Graham & ILaney, PA
Florence, South Carolina, 29501

(Signature page to follow)

July 18, 2017

(Signature page to follow)



Elizabeth Langley
1225 Edgewood Ave.
Florence, South Carolina
29501
Phone: 843-615-6918
Email: elizalangley@aol.com

RECEIVED

JUL 18 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Honorable Craig D. Brown, Presiding Judge

Appellate Case No. 2015-001941

Elizabeth J. langleyAppellant

v.

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Of whom Wendy J. Lynch is this.....Respondent.

PROOF OF SERVICE

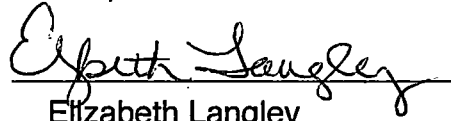
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Joseph M. McCulloch, Jr., Esquire
Kathy R. Schillaci, Esquire
Law Offices of Joseph M. McCulloch, Jr.
Post Office Box 11623
Columbia, SC 29211

J. Rene Josey, Esquire
Post Office box 5478 (29502)
Turner Padget Graham & ILaney, PA
Florence, South Carolina 29501

July 18, 2017

(Signature page to follow)

A handwritten signature in black ink, reading "Elizabeth Langley", written over a horizontal line.

Elizabeth Langley
1225 Edgewood Ave.
Florence, South Carolina
29501
Phone: 843-615-6918
Email: elizalangle@aol.com