

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen
Fourteenth Judicial Circuit

Appellate Case No.: 2017-000685

RECEIVED

AUG 03 2017

SC Court of Appeals

Barbara Aimar Goodwin.....Appellant,

v.

Ronald A. Rossetti, Individually, and as Trustee of the Ronald L. Rossetti
Trust – 1989, Linda A. Rossetti, as Trustee of the Ronald L. Rossetti Trust,
the Ronald L. Rossetti Trust, Christopher T. Godley, and
Jade Godley.....Respondents.

**RESPONDENTS' RESPONSE IN OPPOSITION TO APPELLANT'S
MOTION TO REMAND**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Before the Court is Appellant Barbara Goodwin's Motion to Remand. Appellant contends the Circuit Court lacked jurisdiction to enter the March 27, 2017 Order Denying Appellant's Motion for Reconsideration. Appellant further asserts remand is necessary because the March 27, 2017 Order was ambiguous.

Respondents oppose the instant motion. The case should not be remanded for a ruling on a motion that was not timely filed. Respondent further submits the underlying Order Denying Appellant's Motion to Reconsider was not ambiguous.

FACTS/PROCEDURAL BACKGROUND

This is a property dispute between owners of adjacent property in Beaufort County. Prior to this appeal, the Hon. Carmen Mullen entertained a Motion for Summary Judgment filed by Respondents Ronald A. Rossetti, Individually, and as Trustee of the Ronald L. Rossetti Trust – 1989, Linda A. Rossetti, as Trustee of the Ronald L. Rossetti Trust (“Rossetti Respondents”). Judge Mullen also heard a Motion for Summary Judgment filed by Respondents Christopher T. Godley and Jade Godley (“Godley Respondents”). On February 9, 2017, the Hon. Carmen Mullen entered a Form 4 Order granting Respondents’ Motions for Summary Judgment. Thereafter, the following motions and correspondence were presented to the Court, followed by a March 27, 2017 Form 4 Order denying Appellant’s Motion to Reconsider which is the Order at issue in the present Motion:

- On February 21, 2017 Appellant’s Counsel, Robert V. Mathison, Jr., sent a Motion for Reconsideration to Judge Carmen Mullen’s Law Clerk and all counsel via email. (February 21, 2017 email; Exhibit A). This Motion was never filed;
- On February 23, 2017, Appellant Barbara Goodwin mailed a *pro se* Motion for Reconsideration to the Beaufort County Clerk of Court which was subsequently filed on March 3, 2017. (Appellant’s Feb. 23, 2017 Mot. to Reconsider; Exhibit B); and
- On March 15, 2017, Appellant filed a Notice of Appeal.

LAW/ANALYSIS

I. Remand is Improper Because the Motion to Reconsider was Untimely.

Appellant’s Motion to Remand should be denied because the Motion for Reconsideration referenced in Appellant’s Motion was not timely filed. Motions under Rule 59 must be served within 10 days after receipt of written Notice of Entry of the Order and then filed within five (5) days after service. Rule 59(e) and 5(d), SCRCP. Here, Appellant received written notice of the Order Granting Respondents’ Motions for Summary Judgment on February 9, 2017. Therefore,

the deadline to serve a Motion to Reconsider was February 21, 2017.¹ Appellant's counsel sent a Motion for Reconsideration via email to the Hon. Carmen Mullen's law clerk and to Respondents' counsel on February 21, 2017. Assuming service by email was effective, that Motion was never filed and is therefore untimely. Then a *pro se* Motion for Reconsideration was served by Appellant Barbara Goodwin on February 23, 2017, two days after the deadline for service. Even if the service was timely, the *pro se* Motion was not filed within five (5) days as required by Rule 5(d), SCRCP. Therefore, Appellant's Rule 59(e) motions are both untimely and have no bearing on this appeal.

If Appellant's Rule 59(e) motion was timely, the Circuit Court would properly retain jurisdiction to decide the post-trial motion and the appropriate relief would be to dismiss the appeal without prejudice and allow Appellant to refile the appeal once the motion was resolved. See Otten v. Otten, 287 S.C. 166, 337 S.E.2d 207 (1985) (dismissing appeal without prejudice so that circuit court could resolve pending motions to alter or amend judgment and to correct clerical mistakes). See also Holmes v. East Cooper Comm. Hospital, Inc., 408 S.C. 138, 758 S.E.2d 483 (2014); Hudson v. Hudson, 290 S.C. 215, 349 S.E.2d 341 (1986); Washington ex rel. Estate of Wasington v. Stewart, No. 2011-186748, 2012 WL 10862432, n. 1 (S.C. 2012) ("Often, when a timely post-trial motion is pending before the lower court, any notice of appeal will be dismissed without prejudice as premature."). For the reasons stated above, the Rossetti Respondents submit the case should not be remanded or dismissed for the purpose of allowing the circuit court to address Appellant's untimely Motion for Reconsideration.

¹ The 10th day following receipt of Judge Mullen's Form 4 Order was February 19, 2017. Because February 19 was a Sunday and the next business day was a holiday (Presidents' Day), Appellant's deadline was extended to Tuesday, February 21, 2017.

II. Remand should be Denied Because the Circuit Court Order is not Ambiguous.

Notwithstanding the fact that Appellant's Motions to Reconsider were both untimely, Appellant's Motion to Remand should also be denied because the circuit court's March 27, 2017 Order is not ambiguous. Contrary to Appellant's assertion, the Order is not "ambiguous as to what is intended." Judge Mullen's Order states: "Plaintiff's Motion to Reconsider this Court's Order, dated February 9, 2017, is respectfully denied without rehearing." (Mar. 27, 2017 Order). There is nothing unclear about the Order.

Moreover, Rule 52, SCRCF, provides that findings of fact and conclusions of law are not required for decisions on "Rule 12 or 56 or any other motion except as provided in 41(b)." See also Woodson v. DLI Properties, LLC, 406 S.C. 517, 527, 753 S.E.2d 428, 433 (2014). Accordingly, the circuit court was not required to list specific findings of fact and conclusions of law. Therefore, Appellant's Motion to Remand should be denied.

CONCLUSION

Appellant's Motions to Reconsider are untimely and, therefore, have no bearing on this appeal. Moreover, there was nothing ambiguous about the Circuit Court's Order that requires the case to be remanded. The Rossetti Respondents, therefore, request Appellant's Motion to Remand be denied.

Signatures on next page.

Respectfully submitted,

COLLINS & LACY, P.C.

By: _____


WILLIAM A. BRYAN, JR.

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AMY L. NEUSCHAFFER

aneuschafer@collinsandlacy.com

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(843) 353-2351 (f)

ATTORNEYS FOR ATTORNEYS FOR
RESPONDENTS RONALD L. ROSSETTI,
INDIVIDUALLY AS TRUSTEE OF THE
RONALD L. ROSSETTI TRUST, AND
LINDA A. ROSSETTI

Murrells Inlet, South Carolina
July 31, 2017

RESPONDENTS' RESPONSE IN OPPOSITION
TO APPELLANT'S MOTION TO REMAND

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen
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AUG 03 2017

SC Court of Appeals

Barbara Aimar Goodwin, f/k/a Barbara A. Gilley.....Appellant,

v.

Ronald A. Rossetti, Individually, and as Trustee of the Ronald L. Rossetti
Trust – 1989, Linda A. Rossetti, as Trustee of the Ronald L. Rossetti Trust,
the Ronald L. Rossetti Trust, Christopher T. Godley, and
Jade Godley.....Respondents.

PROOF OF SERVICE

I certify that I have served Respondents' Response in Opposition to Appellant's Motion to Remand, by depositing a copy in the United States Mail, first class postage prepaid, on July 31, 2017, addressed to the attorneys of record as follows:

Robert V. Mathison, Jr., Esquire
Mathison & Mathison
PO Box 5271
Hilton Head Island, SC 29938
Attorney for Appellant

George H. O'Kelley, Jr.
Attorney at Law
715 Bay Street
PO Box 1072
Beaufort, SC 29901
Attorney for Respondents Christopher T. Godley and Jade Godley

Respectfully submitted,

COLLINS & LACY, P.C.

By:



WILLIAM A. BRYAN, JR.

wbryan@collinsandlacy.com

AMY L. NEUSCHAFER

aneuschafer@collinsandlacy.com

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ATTORNEYS FOR RESPONDENTS RONALD L.
ROSSETTI, INDIVIDUALLY AS TRUSTEE OF
THE RONALD L. ROSSETTI TRUST, AND
LINDA A. ROSSETTI

Will Bryan

From: rmathlaw@aol.com
Sent: Tuesday, February 21, 2017 8:30 PM
To: mmeehan@bcgov.net
Cc: Cmullenlc@sccourts.org; golaw@hargray.com; Will Bryan
Subject: Barbara A. Goodwin v. Ronald L. Rossetti, et al.; Case No. 2014-CP-07-02268.
Attachments: 2017-02-21 Goodwin (Rossetti) Motion for Reconsideration.pdf

Ms. Meehan,

Attached is Ms. Goodwin's Motion for Reconsideration in the action referenced.

I am forwarding it to you, as well as to opposing counsel (and to Judge Mullen) to protect Ms. Goodwin's rights because the e-filing system would not allow me access. As matters turn out, that is because I have been administratively suspended for failure to pay bar fees, and an order to that effect and bearing today's date was posted some time this afternoon on the Judicial Administration web site, though I was not aware of it when I finished and attempted to file this motion.

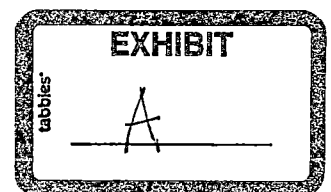
I expect to be in Columbia tomorrow and will notify you once I know what will be required to get this matter straightened out.

I apologize for the inconvenience.

Thank you.

Rob Mathison.

Law Offices of Mathison & Mathison
Post Office Box 5271
Hilton Head Island, SC 29938
843-785-6503 rmathlaw@aol.com



STATE OF SOUTH CAROLINA

) IN THE COURT OF COMMON PLEAS

) (Case No. 2014-CP-07-02268)

COUNTY OF BEAUFORT)

Barbara Aimar Goodwin, f/k/a)

Barbara A. Gilley,)

) Plaintiff,)

) vs.)

) **NOTICE AND MOTION**

) (Reconsideration)

) Ronald L. Rossetti, Individually, and as)

) Trustee of the Ronald L. Rossetti Trust -)

) 1989, Linda A. Rossetti, as Trustee of)

) the Ronald L. Rossetti Trust, The Ronald)

) L. Rossetti Trust, Christopher T. Godley)

) and Jade Godley,)

) Defendants.)

TO: GEORGE H. O'KELLEY, JR., Esquire, and WILLIAM A. BRYAN, JR.,
Esquire, Attorney for the Defendants.

PLEASE TAKE NOTICE that the Plaintiff herein, Barbara A. Goodwin, by and through her undersigned attorney, ten (10) days after the service hereof, at such time and upon such date as shall be scheduled by the Court, will move before the Honorable Carmen T. Mullen in the Court of Common Pleas for Beaufort County, at the Beaufort County Courthouse, 102 Ribaut Road, Beaufort, South Carolina, for the following relief:

I. An order, pursuant to Rules 52(b) and 59(e), SCRCP, replacing, amending or modifying the Order filed in this case on February 9, 2017, in the following particulars and upon the following grounds:

(A). To amend the Order to clarify the meaning of the Court's denial of the "Plaintiff's Motion for Entry of Default," upon the grounds that the Plaintiff did not file the

motion. The Defendants Godley did, with respect for their ostensible counterclaim, and the Plaintiff moved for relief from the entry of default if, in fact, a default existed.

(B). To amend the Order, based upon evidence set forth in the three affidavits filed and served by the Plaintiff, and in the Plaintiff's Answers to the Defendants' Interrogatories dated July 31, 2015, which were expressly verified in and adopted by the Plaintiff's Affidavit dated October 3, 2016, and in the Photograph Album of the conditions and signs existing on the easement and the Plaintiff's real property during September of 2012, as authenticated, identified, verified and adopted in the Affidavit of Carolyn P. Sanders dated September 29, 2016, and in the depositions of the parties, as well as of Mr. Calvin Watson, that adequate evidence exists, and certainly more than a scintilla, with respect to each of the following material questions of fact:

1. Sufficient evidence of the "parameters" of the easement exists in the documents described above, as well as in (a) the deed conveying the property to the Plaintiff and (b) the plats showing the easement in her chain of title. In addition, the Plaintiff specifically testified about the extent of the easement which she seeded and maintained, which coincided with the easement for utilities in favor of SCE&G (now Scana Corporation). Finally, the Rossetti Defendants destroyed the best evidence of the scope of the easement when they bulldozed the area in September of 2012.

2. The evidence not only shows adversity of use for the periods required by the First, Second and Third Causes of Action in the Complaint, it also shows that it was consistent in character, continuous and uninterrupted for the more than 20 years of the Plaintiff's ownership.

3. The evidence shows sufficient commercial use, if such may be required, which is not conceded by the Plaintiff, and sufficient similar, equivalent or "like kind" use regardless.

4. Clear evidence of the Plaintiff's right to a perfected color of title claim exists in the documents described in paragraphs (B) and (B)1(a) and (b) above.

5. Clear evidence exists of visual and written publication of false statements that were and are derogatory to the Plaintiff's title, as does evidence of malice, causation, pecuniary loss and damages—all as a consequence of the Rossetti Defendants' actions and omissions.

6. Evidence exists of an ulterior purpose or motive on the part of the Rossetti Defendants, namely, coercing the conveyance of a parcel by the Plaintiff so that said Defendants could have access to deep water on the river for a dock, which had absolutely nothing to do with the appeal by the Defendants of a ruling that they perceived to be adverse to them by the Beaufort County Zoning Board of Appeals (herein "the ZBOA"), as does evidence with respect to a willful act and each of the other elements of abuse of process.

7. Evidence exists with respect to conduct of and by the Rossetti Defendants and of and by the Godley Defendants which supports each of the material elements of conspiracy, to wit (a) a combination of two or more persons, (b) for the purpose of injuring another, (c) which caused injury, including special damages, to the Plaintiff, all as appears from the items described in paragraph (B) above.

8. The Rossetti Defendants made no argument with respect to the statute of limitations, and, manifestly, the First, Second, Third, Fifth and Sixth Causes of

Action are not time barred. In view of date of the filing of the Summons and Complaint in this case, as well as the date of delivery of them to the Beaufort County Sherriff's Office for service of process, both of which clearly preceded the expiration of two years from the date of first publication by the Rossetti Defendants of the disparagement of the Plaintiff's title, the Plaintiff's Fourth Cause of Action for slander of title is also no affected by the statute.

(D) As a matter of law, no pleading exists, by way of counterclaim or otherwise, that would allow the Godley Defendants to pursue a cause of action against the Plaintiff for abuse of process, the material elements omitted being (a) the recitation of any jurisdictional facts, (b) the allegation of an ulterior motive or purpose and (c) the allegation of a willful act in the use of the process that is not proper in the regular conduct of the proceeding. See, e.g., *Winn-Dixie Greenville, Inc. v. Huggins*, 249 S.C. 206, 209, 153 S.E.2d 693, 694 (1967).

(E) As a matter of law, as well as upon the facts of this case, in an appeal to the Court of Common Pleas by the Rossetti Defendants (Case No. 2012-CP-07-03300) about alleged procedural deficiencies leading to an adverse administrative decision by the ZBOA, the Plaintiff, who was joined because of her interest in the outcome of the decision, (1) did not have the right to file a counterclaim against the Rossetti Defendants to litigate with them the validity, scope and purpose of her easement at common law, let alone her tort claims, as set forth in the Fourth, Fifth and Sixth Causes of Action in the Complaint; and/or (2) was not required to file a compulsory counterclaim under Rule 13, SCRPC.

(F) For the reasons specified in paragraph (E) above, the decision of the Court of Common Pleas in Case No. 2012-CP-07-03300 did not amount to “the law of the case” such as to preclude the Plaintiff from litigating the claims set forth in her Complaint in this action.

(G) For the reasons specified in paragraphs (E) and (F) above, “the claim to a prescriptive easement over property belonging to the Rossetti Trust” is not an “improper collateral attack” on the findings in Case No. 2012-CP-07-03300. Nether is such a claim barred by the doctrine of *res judicata* or the doctrine of collateral estoppel.

THIS MOTION is exempt from the certification requirement under Rule 11(a), SCRCP, and discussion with opposing counsel otherwise would serve no useful purpose in any event.

Respectfully Submitted,

By: s/ Robert V. Mathison, Jr.
Robert V. Mathison, Jr.
Attorney for the Plaintiff
Barbara A. Goodwin

MATHISON & MATHISON
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Hilton Head Island, SC 29938
Telephone: (843) 785-6503
Email: rmathlaw@aol.com

February 21, 2016

Hilton Head Island, South Carolina.

motion. The Defendants Godley did, with respect for their ostensible counterclaim, and the Plaintiff moved for relief from the entry of default if, in fact, a default existed.

(B). To amend the Order, based upon evidence set forth in the three affidavits filed and served by the Plaintiff, and in the Plaintiff's Answers to the Defendants' Interrogatories dated July 31, 2015, which were expressly verified in and adopted by the Plaintiff's Affidavit dated October 3, 2016, and in the Photograph Album of the conditions and signs existing on the easement and the Plaintiff's real property during September of 2012, as authenticated, identified, verified and adopted in the Affidavit of Carolyn P. Sanders dated September 29, 2016, and in the depositions of the parties, as well as of Mr. Calvin Watson, that adequate evidence exists, and certainly more than a scintilla, with respect to each of the following material questions of fact:

1. Sufficient evidence of the "parameters" of the easement exists in the documents described above, as well as in (a) the deed conveying the property to the Plaintiff and (b) the plats showing the easement in her chain of title. In addition, the Plaintiff specifically testified about the extent of the easement which she seeded and maintained, which coincided with the easement for utilities in favor of SCE&G (now Scana Corporation). Finally, the Rossetti Defendants destroyed the best evidence of the scope of the easement when they bulldozed the area in September of 2012.

2. The evidence not only shows adversity of use for the periods required by the First, Second and Third Causes of Action in the Complaint, it also shows that it was consistent in character, continuous and uninterrupted for the more than 20 years of the Plaintiff's ownership.

3. The evidence shows sufficient commercial use, if such may be required, which is not conceded by the Plaintiff, and sufficient similar, equivalent or “like kind” use regardless.

4. Clear evidence of the Plaintiff’s right to a perfected color of title claim exists in the documents described in paragraphs (B) and (B)1(a) and (b) above.

5. Clear evidence exists of visual and written publication of false statements that were and are derogatory to the Plaintiff’s title, as does evidence of malice, causation, pecuniary loss and damages—all as a consequence of the Rossetti Defendants’ actions and omissions.

6. Evidence exists of an ulterior purpose or motive on the part of the Rossetti Defendants, namely, coercing the conveyance of a parcel by the Plaintiff so that said Defendants could have access to deep water on the river for a dock, which had absolutely nothing to do with the appeal by the Defendants of a ruling that they perceived to be adverse to them by the Beaufort County Zoning Board of Appeals (herein “the ZBOA”), as does evidence with respect to a willful act and each of the other elements of abuse of process.

7. Evidence exists with respect to conduct of and by the Rossetti Defendants and of and by the Godley Defendants which supports each of the material elements of conspiracy, to wit (a) a combination of two or more persons, (b) for the purpose of injuring another, (c) which caused injury, including special damages, to the Plaintiff, all as appears from the items described in paragraph (B) above.

8. The Rossetti Defendants made no argument with respect to the statute of limitations, and, manifestly, the First, Second, Third, Fifth and Sixth Causes of

Action are not time barred. In view of date of the filing of the Summons and Complaint in this case, as well as the date of delivery of them to the Beaufort County Sherriff's Office for service of process, both of which clearly preceded the expiration of two years from the date of first publication by the Rossetti Defendants of the disparagement of the Plaintiff's title, the Plaintiff's Fourth Cause of Action for slander of title is also no affected by the statute.

(D) As a matter of law, no pleading exists, by way of counterclaim or otherwise, that would allow the Godley Defendants to pursue a cause of action against the Plaintiff for abuse of process, the material elements omitted being (a) the recitation of any jurisdictional facts, (b) the allegation of an ulterior motive or purpose and (c) the allegation of a willful act in the use of the process that is not proper in the regular conduct of the proceeding. See, e.g., *Winn-Dixie Greenville, Inc. v. Huggins*, 249 S.C. 206, 209, 153 S.E.2d 693, 694 (1967).

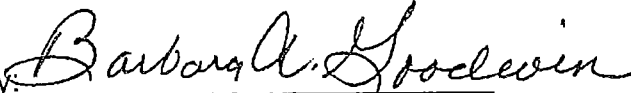
(E) As a matter of law, as well as upon the facts of this case, in an appeal to the Court of Common Pleas by the Rossetti Defendants (Case No. 2012-CP-07-03300) about alleged procedural deficiencies leading to an adverse administrative decision by the ZBOA, the Plaintiff, who was joined because of her interest in the outcome of the decision, (1) did not have the right to file a counterclaim against the Rossetti Defendants to litigate with them the validity, scope and purpose of her easement at common law, let alone her tort claims, as set forth in the Fourth, Fifth and Sixth Causes of Action in the Complaint; and/or (2) was not required to file a compulsory counterclaim under Rule 13, SCRPC.

(F) For the reasons specified in paragraph (E) above, the decision of the Court of Common Pleas in Case No. 2012-CP-07-03300 did not amount to “the law of the case” such as to preclude the Plaintiff from litigating the claims set forth in her Complaint in this action.

(G) For the reasons specified in paragraphs (E) and (F) above, “the claim to a prescriptive easement over property belonging to the Rossetti Trust” is not an “improper collateral attack” on the findings in Case No. 2012-CP-07-03300. Neither is such a claim barred by the doctrine of *res judicata* or the doctrine of collateral estoppel.

THIS MOTION is exempt from the certification requirement under Rule 11(a), SCRCP, and discussion with counsel for the Defendants otherwise would serve no useful purpose.

Respectfully Submitted,

By: 
Barbara A. Goodwin, Pro Se

66 Godley Road
Saint Helena Island, SC 29920
Telephone: (912) 655-9080
Email: egsphy@gmail.com

February 23, 2017

Beaufort, South Carolina.

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

Barbara Aimar Goodwin, f/k/a
Barbara A. Gilley,

Plaintiff,

vs.

Ronald L. Rossetti, Individually, and as
Trustee of the Ronald L. Rossetti Trust -
1989, Linda A. Rossetti, as Trustee of
the Ronald L. Rossetti Trust, The Ronald
L. Rossetti Trust, Christopher T. Godley
and Jade Godley,

Defendants.

IN THE COURT OF COMMON PLEAS
(Case No. 2014-CP-07-02268)

CERTIFICATE OF MAILING

I, Barbara A. Goodwin, hereby certify that, on February 24, 2017, I filed and served by mail the original and copies of the Plaintiff's Motion for Reconsideration dated February 23, 2017, by depositing same, with sufficient first class postage prepaid, at the United States Post Office at Beaufort, South Carolina, addressed as follows:

The Honorable Jerri Anne Roseneau
Clerk of Court for Beaufort County
Post Office Drawer 1128
Beaufort, South Carolina 29901

George H. O'Kelley, Jr., Esquire
Attorney at Law
Post Office Box 1072
Beaufort, South Carolina 29901

William A. Bryan, Jr., Esquire
Collins & Lacy, PC
11945 Grandhaven Drive, Suite D
Murrells Inlet, South Carolina 29576

By: 

Barbara A. Goodwin, *Pro Se*
Plaintiff
66 Godley Road
Saint Helena Island, SC 29920
Telephone: (912) 655-9080
Email: egsphygmail.com

February 24, 2017

Beaufort, South Carolina.



William A. Bryan, Jr. | 843.353.2330 | wbryan@collinsandlacy.com

July 31, 2017

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

RECEIVED
AUG 03 2017
SC Court of Appeals

Re: Barbara Aimar Goodwin, Appellant v. Ronald L. Rossetti, Individually, and as Trustee of the Ronald L. Rossetti Trust - 1989, Linda A. Rossetti, as Trustee of the Ronald L. Rossetti Trust, The Ronald L. Rossetti Trust, Christopher T. Godley and Jade Godley, Respondents
Appellate Case No.: 2017-000685
C&L File No.: 1-2234

Dear Ms. Kitchings:

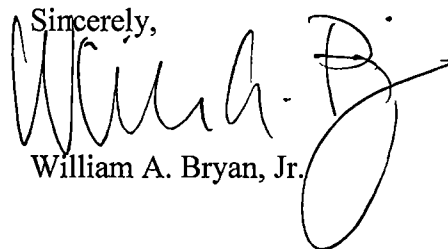
With regard to the above matter, please find enclosed for filing with the Court an original plus seven (7) copies of the following:

- Respondents Ronald L. Rossetti, Individually, and as Trustee of the Ronald L. Rossetti Trust - 1989, Linda A. Rossetti, as Trustee of the Ronald L. Rossetti Trust, The Ronald L. Rossetti Trust's Respondents' Response In Opposition To Appellant's Motion To Remand; and
- Proof of Service.

By copy of this letter to counsel of record, I hereby serve each with a copy of these documents.

Please return a clocked copy of these in the enclosed stamped, self-addressed envelope.

With kind regards,

Sincerely,

William A. Bryan, Jr.

WAB:dma
Enclosures

cc: George H. O'Kelley, Jr., Esquire
Robert V. Mathison, Jr., Esquire

\$3.50⁹
US POSTAGE
FIRST-CLASS
071V00683522
29576
000011497



\$1.40⁹
US POSTAGE
FIRST-CLASS
071V00683522
29576
000011510



Collins Lacy
ATTORNEYS AT LAW

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The Honorable Jenny Abbott Kitchings
Clerk of Court
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Columbia, SC 29211