

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2017-000882

RECEIVED
SEP 12 2017
SC Court of Appeals

In Re: Eleanor McCarthy Lenahan Trust under agreement Dated July 12, 2001.

Kathleen Suzanne Heslin and Maureen Teresa Mosley, in their capacities as Cotrustees of the Eleanor McCarthy Lenahan Trust under agreement dated July 12, 2001.....Appellants,

v.

Mary Kathleen Lenahan, individually and in her capacity as Trustee of the Art. X(35) MKL Trust Share UAD 071201, Jean Marie Qualliu, Joan Eleanor DeMaio, and Christine Ann LenahanRespondents,

Of Whom Mary Kathleen Lenahan and Jean Marie Qualliu are Respondents.

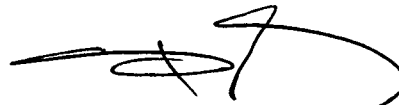
**DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Appellants propose the following be included in the Record on Appeal:

1. Supplemental Order, dated March 14, 2017
2. Form 4 Order, dated February 13, 2017
3. Form 4 Order, dated November 9, 2016
4. Order, dated July 13, 2016
5. Amended Form 4 Order, dated April 18, 2016
6. Petition for Declaratory Judgment and Other Relief
7. Appellants' Notice of Motion and Motion for Reconsideration, Alteration and/or Amendment

8. Mary Kathleen Lenahan's and Jean Marie Qualliu's Motion for Partial Summary Judgment
9. Appellants' Notice of Motion and Motion to Stay Litigation
10. Mary Kathleen Lenahan's and Jean Marie Qualliu's Motion to Dismiss
11. Petition to Accept Resignation as Co-Trustees; Petition to Accept Appointment of Successor Trustee
12. Transcript of Hearing, February 2, 2017, pp. 13, 15
13. Transcript of Hearing, January 13, 2016, p. 16
14. Fourth Amendment and Restatement of Trust Agreement of Eleanor McCarthy Lenahan
15. Affidavit of Maureen Theresa Mosley, dated January 30, 2017

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



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Attorneys for Appellants

September 6, 2017

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2015-CP-07-1980

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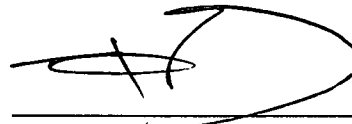
Mary Kathleen Lenahan, individually and in her capacity as Trustee of the
Art. X(35) MKL Trust Share UAD 071201, Jean Marie Qualliu, Joan Eleanor
DeMaio, and Christine Ann LenahanRespondents,

Of Whom Mary Kathleen Lenahan and Jean Marie Qualliu are Respondents.

PROOF OF SERVICE

I certify that I have served the Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal upon Respondents Mary Kathleen Lenahan and Jean Marie Qualliu by depositing a copy of same in the United States Mail, postage prepaid, on September 6, 2017, addressed to Respondents' attorney of record, Kelly M. Jolley, Esquire.

(Signature on next page following.)



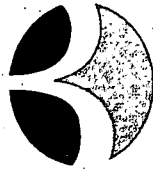
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Attorneys for Appellants

September 6, 2017

I:\H to M Clients\Heslin, Kathleen - BL026\Appeal\Appellants' Initial Brief\proof of service - initial brief and DOM.wpd



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September 6, 2017

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Attention: Amelia Smith
Post Office Box 11629
Columbia, SC 29211

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SC Court of Appeals

**RE: In Re: Eleanor McCarthy Lenahan Trust under agreement dated July 12, 2001;
Kathleen Suzanne Heslin and Maureen Theresa Mosley, et al. v. Mary Kathleen
Lenahan, et al.**
Case No. 2015-CP-07-1980
Appellate Case No. 2017-000882

Dear Ms. Smith:

Please find enclosed the original and one copy each of the Appellant's Initial Brief, Designation of Matter to be Included in the Record on Appeal and proof of service for the above-captioned case. I would appreciate it if you would file the originals and return the clocked-copies to me via the enclosed, self-addressed stamped envelope.

By copy of this letter, I am serving copies of the aforesaid documents upon opposing counsel, pursuant to the applicable South Carolina Appellate Court rules.

If you have any questions, please do not hesitate to contact me.

With kind, personal regards, I am

Sincerely,

BOLCHOZ LAW FIRM, PA

Sean Michael Bolchoz
SENDER'S E-MAIL ADDRESS:
SBOLCHOZ@BOLCHOZLAW.COM

SMB/kgb
Enclosures

cc: Kelly M. Jolley, Esquire (w/encl.)
Douglas S. Delaney, Esquire (via email only to doug@delaneylawfirm.com)
Kathleen Heslin (via email only to klheslin@yahoo.com)
Maureen Mosley (via email only to mosley745@gmail.com)

E:\H to M Clients\Heslin, Kathleen - BL026\Appeal\Appellants' Initial Brief\A. Smith ltr - initial brief - designation of matter.wpd



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The Honorable Jenny Abbot Kitchings
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