

**STATE OF SOUTH CAROLINA  
IN THE  
COURT OF APPEALS**

Appeal from the Court of Common Pleas  
For Beaufort County  
Honorable Carmen T. Mullen, Circuit Judge  
Civil Action No.: 2015-CP-07-00913

IN THE MATTER OF THE ESTATE OF JOHN JOSEPH MANNING, Jr.

Deanna Bushman, as Holder of Durable Power of Attorney  
for Sally Manning,

Respondent,

v.

The Estate of John Joseph Manning, Jr., John J. Manning, III,  
Christopher Manning, and Linda Manning,

Appellants.

**NOTICE OF APPEAL**

**RECEIVED**

SEP 29 2017

**SC Court of Appeals**

R. Bruce Wallace, Esquire  
S.C. Bar. No.: 011653  
Stephen P. Groves, Sr., Esquire  
S.C. Bar. No.: 007854  
**NEXSEN PRUET, LLC**  
205 King Street, Suite 400  
Charleston, South Carolina 29401  
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[BWallace@nexsenpruet.com](mailto:BWallace@nexsenpruet.com)

*Attorneys for the Appellants*

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

COMES NOW the Appellants, The Estate of John Joseph Manning, Jr., John J. Manning, III, Christopher Manning, and Linda Manning (the "Manning Family"), pursuant to Rule 203 of the South Carolina Appellate Court Rules, and respectfully serves notice that the Manning Family is appealing the following orders and judgments:

- a. Order Granting Partial Summary Judgment as to the Elective Share Cause of Action dated 07 September 2017, and filed with the Clerk of Court for the Charleston County Court of Common Pleas on 08 September 2017;
- b. SCRPC Form 4C Judgment In A Civil Case denying Defendants' Motion to Reconsider issued by the Honorable Carmen T. Mullen, Circuit Judge, dated 19 September 2017, and filed with the Clerk of Court for the Charleston County Court of Common Pleas on 19 September 2017.

Copies of the referenced Circuit Court Order and the SCRPC Form 4C Judgment In A Civil Case forms are collectively attached hereto as Exhibit "A" and incorporated herein by reference.

Respectfully submitted:

~~NEXSEN PRUET, LLC~~

By:

R. Bruce Wallace, Esquire

S.C., Bar No.: 011653

Stephen P. Groves, Sr., Esquire

S.C. Bar No.: 007854

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Charleston, South Carolina

27 September 2017

**OTHER COUNSEL OF RECORD**

J. Ashley Twombly, Esquire  
Jennifer A. Campbell, Esquire  
*TWENGE + TWOMBELEY LAW FIRM*  
311 Carteret Street  
Beaufort, South Carolina 29902  
Telephone: 843.982.0100

*Attorneys for the Respondent*

**STATE OF SOUTH CAROLINA  
IN THE  
COURT OF APPEALS**

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Appeal from the Court of Common Pleas  
For Beaufort County  
Honorable Carmen T. Mullen, Circuit Judge  
Civil Action No.: 2015-CP-07-00913

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IN THE MATTER OF THE ESTATE OF JOHN JOSEPH MANNING, Jr.

SEP 29 2017

Deanna Bushman, as Holder of Durable Power of Attorney  
for Sally Manning,

**SC Court of Appeals**

Respondent,

v.

The Estate of John Joseph Manning, Jr., John J. Manning, III,  
Christopher Manning, and Linda Manning,

Appellants.

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**PROOF OF SERVICE  
For The  
NOTICE OF APPEAL**

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R. Bruce Wallace, Esquire  
S.C. Bar. No.: 011653  
Stephen P. Groves, Sr., Esquire  
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[BWallace@nexsenpruet.com](mailto:BWallace@nexsenpruet.com)

*Attorneys for the Appellants*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 27<sup>th</sup> September 2017, I served a copy of the **Notice of Appeal** submitted by the Appellants, The Estate of John Joseph Manning, Jr., John J. Manning, III, Christopher Manning, and Linda Manning, on counsel for the Respondent via the United States Mail, postage pre-paid, and addressed as follows:

J. Ashley Twombly, Esquire  
Jennifer A. Campbell, Esquire  
**TWENGE + TWOMBELEY LAW FIRM**  
311 Carteret Street  
Beaufort, South Carolina 29902  
Telephone: 843.982.0100

*Attorneys for the Respondent*

Signed: 

Stephen P. Groves, Sr.

Charleston, South Carolina

21 September 2017

Stephen P. Groves, Sr.  
Member  
Admitted in SC

27 September 2017

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SOUTH CAROLINA COURT OF APPEALS  
1220 Senate Street  
Columbia, South Carolina 29201

RECEIVED  
SEP 29 2017  
SC Court of Appeals

Re: *In The Matter of the Estate of John Joseph Manning, Jr.  
Deanna Bushman, as Holder of Durable Power of Attorney  
Sally Manning v. The Estate of John Joseph Manning, Jr.;  
John Joseph Manning, III; Christopher Manning; and Linda  
Manning*

Appeal from the Beaufort County Court of Common Pleas  
Case Action No.: 2015-CP-07-0913  
(Previous Probate Ct. No. 2014ES0700930)

Appellate Case Tracking No.: **2017-**\_\_\_\_\_  
NP File No.: 059181-00001

Charleston

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh

Dear Ms. Kitchings:

Pursuant to Rules 203(a), (b), (d), SCACR, enclosed please find the original and two copies of a Notice of Appeal in the above-referenced appellate matter submitted on behalf of the Appellants, The Estate of John Joseph Manning, Jr.; John Joseph Manning, III; Christopher Manning; and Linda Manning. I also enclose the original and one copy of a Proof of Service indicating service of a copy of the Notice of Appeal upon J. Ashley Twombly, Esquire and Jennifer A. Campbell, Esquire, counsel for the Respondent, Deanna Bushman, as Holder of Durable Power of Attorney Sally Manning. Please note that copies of the appealed order and SCRCP Form 4C judgments/order are collectively attached to the Notice of Appeal as Exhibit "A" and incorporated therein by reference. I also enclose our firm check in the amount of \$100.00 as payment for the applicable filing fee set forth in Rule 203(d)(1)(B)(iii), SCACR.

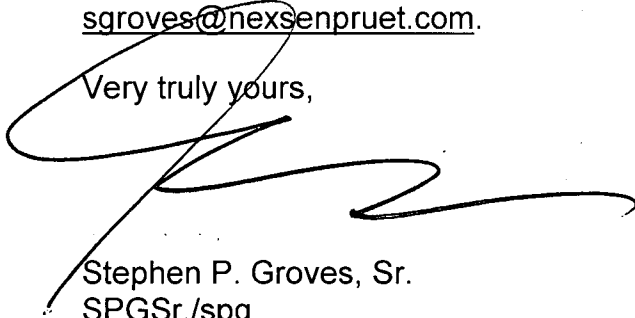
Honorable Jenny Abbott Kitchings  
Clerk of Court  
27 September 2017  
Page 2 of 2

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I would appreciate your filing the **Notice of Appeal**, as well as the **Proof of Service**, with the Court of Appeals and returning one stamped copy of each to my attention in the enclosed self-addressed stamped envelope.

If you need anything else or I otherwise may be of any assistance to you or to the Court of Appeals regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is [sgroves@nexsenpruet.com](mailto:sgroves@nexsenpruet.com).

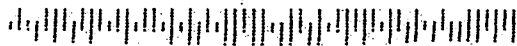
Very truly yours,



Stephen P. Groves, Sr.  
SPGSr./spg  
Enclosures

cc: J. Ashley Twombly, Esquire  
Jennifer A. Campbell, Esquire  
Elizabeth B. Mayo, Esquire

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**NEXSEN | PRUET**

P. O. Box 486  
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The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court Of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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SEP 29 2017

SC Court of Appeals

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