

THE STATE OF SOUTH CAROLINA

In the Court of Appeals of South Carolina

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Thomas L. Hughston, Jr., Circuit Court Judge

RECEIVED
APR 09 2018
SC Court of Appeals

Case No. 2009-CP-10-3010
Appellate Case 2018 000604

Betty Fisher and Lisa Fisher.....Appellants

v.

Bessie Huckabee, Kay Passailaigue Slade, and Sandra Byrd.....Respondents

AFFIDAVIT OF LISA FISHER

PERSONALLY APPEARED before me LISA FISHER, who being first duly sworn,
stated as follows:

1. My name is LISA FISHER, and I am over the eighteen and of sound mind. I am one of the plaintiffs in this case.
2. I have personal knowledge of the matters set forth herein and if called and sworn to testify, I could and would competently do so.
3. I intended to file this affidavit with my motion for new trial which I learned on April 3, 2018, two days before the deadline, I could not file.
4. RELEVANT PLEADINGS: All pleadings, orders and documents attached to the petition for writ of supercedeas are true and correct.

RELEVANT ORDERS:

A) ORDER AFTER JURY TRIAL

B) ORDER AFTER CONSTRUCTIVE TRUST TRIAL

Said order made no required findings under Rule 52 regarding plaintiffs efforts to seek a constructive trust. Instead, the court imposed the following judgment in the amount of:

**\$253,969.31 payable to Bessie Huckabee, Kay Passailague Slade, and Sandra Byrd from Lisa Fisher, John Hughes Cooper & Betty Fisher.

**\$229,599.51 payable to The Estate of Alice Shaw Baker from Lisa Fisher;

**\$65,151.34 payable to the Estate of Alice Shaw Baker from John Hughes Cooper. (It is important to note that this amount is the previously ordered fees approved from the probate court during Alice Shaw Baker's life.)

The order reflects that the court had someone else convert Lisa Fisher's accounting into some type of spreadsheet. This was not introduced, nor was there any ability to dispute it or explain it. The court knew that Judge Fulp had already indicated that there would be a hearing in probate regarding my accounting, wherein I would have an opportunity to be heard. The court indicated that there was \$69,533.17 improper expenditures without any opportunity to provide evidence. Thereafter, the Court denied my fees as conservator. It awarded 3 times the actual damages to the estate, however there was no evidence or opportunity to be heard on these damages.

Most shocking and hurtful is the statement towards the end of the order which stated that the real purpose for trying to fly Alice to California was to “have her die in California, ultimately avoid the jurisdiction of South Carolina Court, control the Estate, defeat the Will, and benefit her mother an herself.” There was no testimony to support this horrific conclusion, nor is it accurate legally. Alice’s estate would have remained in South Carolina, unless I had petitioned the California Court and South Carolina Court would have had authority to make me account and review my transactions here, before transfer to California. My only desire was to have Alice restored to health and live a long life. She was family and she was loved. My help was based on my love for Alice and my mother, who was committed to helping Alice—her mother’s baby sister! The order is a nightmare and not supported by any facts other than the court’s deep hatred of Plaintiffs and their use of the judicial system to try and protect the property for Alice’s stated desires.

C) ORDER RELEASING ALL MONIES TO BESSIE HUCKABEE, KAY SLADE, AND ENJOINING PLAINTIFFS FROM FILING ANY MOTIONS IN CIRCUIT COURT. ALL FILINGS TO BE IN THE SUPREME COURT.

Said order releases all of the monies now held in the court after the previously filed Interpleader action. It also removes the house from the conservator’s care, despite this issue being before the Supreme Court in a

related Petition for Writ of Certiorari.¹ Bessie Huckabee admitted at trial that she could not be bonded. There is no information on whether Kay Passailague Slade can be bonded.

If Appellants are successful on appeal, recourse for recovery of these funds on behalf of animal charities may be limited.

Finally, said order indicated as an "additional" sanction that Plaintiffs were enjoined from filing any motions in the Circuit court, and that all future filings must be filed with the Supreme Court of South Carolina.

D. DIRECTIONS BY THE PROBATE COURT ON THE PROPER MANNER TO SEEK APPOINTMENT OF A SPECIAL ADMINISTRATOR

E. WILL CONTEST TRANSCRIPT WHERE THE COURT ESSENTIALLY DIRECTED THE JURY TO FIND THE WILL VALID. Attached hereto is a true and correct copy of pertinent portions of the will contest wherein Judge Hughston directed and prosecuted the case for defendants.

At trial in the Will Contest matter, the Court took action to introduce the disputed will of Alice Shaw Baker stating:

"We have to have a will put

¹ It also implicates the caregiver's rights as she currently has an appeal, wherein an appeal bond was filed and determination of these issues should be resolved. Attorney Crowley prematurely brought the action not disclosing that Huckabee failed to get a bond, thus she had no authority.

in somewhere into evidence in this case.”

Thereafter, in instructing the jury, Judge Hughston stated:

“You can look at it and see exactly what Judge Curry said on that occasion as far as what she found to be what she should do on that occasion, based on what was before her at that time. Which I'm not sure of the date of it, I believe it's in November, or whatever; you will have that and you can look at it and see when it was. You can see what she said in that order, and you can presume that she had good reason to say that. She had good reason to do what she did when she put it in writing and filed in the probate court. You can presume that, that she was not able to make a will at that time” (Will Contest Transcript, P. 481, ll. 1-16)

Plaintiffs contend that he acted as advocate for Defendants.

5. The circuit court's order is devastating in that it makes conclusionary statements that are not founded in fact. I complained during trial that the court was sua sponte reviewing the files in the other cases, without an opportunity to be heard.

6. I believed that the facts supported the law in this case, and that the claims were warranted under existing law or that an extension, modification, or reversal of law was available with regard to these legal proceedings.

7. Further, I believed based on the my conversations with my great aunt, Alice Shaw Baker, that everything I was doing was proper. As the testimony set forth, Alice Shaw Baker wanted her monies to be used for animal charities. Despite Judge Hughston's conclusions about me, I believed that as her conservator, I had a duty to ensure that the appropriate persons received the distribution pursuant S.C. Code § 62-5-425(d) and § 62-7-707. Therefore, the significant evidence in the record, the attempt to revoke, and the judicial admissions of Kay Passailague Slade led me to believe at all times, that my proper legal efforts were made to protect the assets and ensure that I was not liable for delivery of the property to the wrong individuals.

8. I did not intend to delay, harass, or injure any other party at any time. I was making sure that I was in compliance with the laws in South Carolina to not leave the real property vacant, I paid all maintenance, insurance, and taxes over the years, the house has increased in value, and I used over \$58,653.42 in my own money to preserve the estate during the period of time after the court made its orders freezing the estate assets. While the amount of monies that I used did not come out at trial, I am attaching a true and correct copy of the monies expended and identified in the writ. I believe this supports my position that I did not intend ever to delay, harass, or injure any other party. There are additional billings that I paid that I am trying to get copies of at this time, however I did not believe that this was relevant in the constructive trust trial. After the court appointed Judge Fulp as probate judge, I believed that this was information that I would provide to him in satisfying my duties as conservator and that these payments prevented waste to the property and allowed it to accrue in value, so that no losses to my great aunt Alice Shaw-Baker's estate would take place.

9. This affidavit goes through the timeline and objects and responds to the specific allegations. The court used the following designations

LEGEND:

Circuit Court Case=No Emphasis

Underlying Probate Case=Underlined

Guardian and Conservator action=*Italics*,

I am trying to maintain the current designation as follows:

2008

10. July 31, 2008—*Elisabeth Spencer files Petition for Appointment of Conservator and Petition for Appointment of Guardian and Petition for Emergency Appointment of Guardian.*

a. **I did not receive this petition originally. When I did receive it, I immediately obtained counsel to help Alice. She was very upset and did not want a conservator.**

11. August 4, 2008—*Order granting petition for emergency appointment of guardian and appointing Walter Kaufman.*

a. **I did not receive this order until after Alice was conserved. When I did receive it, I immediately obtained counsel to help Alice. She was very upset and did not want a conservator.**

12. August 18, 2008—*Order appointing Family Services, Inc. as Conservator and Order appointing Walter Kaufman and Jane Orenstein as co-guardians.*

a. **I did not receive this order until after Alice was conserved. When I did receive it, I immediately obtained counsel to help Alice. She was very upset and did not want a conservator.**

13. August 19, 2008—*John Hughes Cooper files Petition to Appoint Lisa Fisher as Conservator and Petition to Appoint Lisa Fisher as Guardian.*

a. **In filing this document, I acted in good faith, believed under the facts of the case that all of the legal claims were warranted under existing law and that a good faith or reasonable argument existed for the extension modification or reversal of existing law. Further, that Appellants did not take any action to harass or injure the other party. Appellants did not and do not believe that the case was frivolous in fact, interposed for delay, or brought for any improper purpose. Appellants knew that Alice Shaw Baker had intended that all of her monies went to animal charities. Alice attempted to revoke the will. There was documentary evidence showing that Alice Shaw Baker believed that Respondent Slade worked at a dog rescue. There was the judicial admission of Respondent Slade who testified. Therefore, I filed this petition.**

14. August 21, 2008—*Elisabeth Spencer Answers and objects to petition to appoint Lisa Fisher.*

A. **I was family, Alice nominated me, and I sought appointment. Ms. Spencer objected and wanted Alice to be subject to professional conservators.**

15. September 8, 2008—*Alice Shaw-Baker and Lisa Fisher file Motion for Temporary Restraining Order to enjoin the removal of Alice Shaw-Baker from her home.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt.**

16. September 9, 2008—*Lisa Fisher answers petition filed by Elisabeth Spencer.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt.**

17. September 16, 2008—*Judge Curry grants temporary restraining order preventing the removal of Alice Shaw-Baker from her home and removes Walter Kaufman as guardian and appoints Lisa Fisher as co-guardian with Jane Orenstein. Judge Curry further ordered the guardians to make Alice Shaw-Baker's house habitable, contact the conservator Family Services, Inc., to arrange an inventory of and take possession of Alice's financial records, arrange for a caretaker, and to inform Alice she can no longer smoke cigarettes inside home.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. Most of this had been done by the time of the order. It was hard for Alice not to be able to smoke in her house. However, she did her best to obey the rules.**

18. September 30, 2008—*Judge Curry Orders (1) Peter A. Kouten to visit home of Alice Shaw-Baker to observe conditions and report to the court; (2) Appointment of*

physician/Examiner L. William Mulbry, M.D., and Rebecca McCrudden; (3) Appointment of Peter A. Kouten as attorney and guardian ad-litem for Alice Shaw-Baker.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. These orders were initiated by the court. At trial, Kouten testified that he did not believe he was appointed Attorney, just Guardian ad litem. I produced the orders appointing him at trial.**

19. October 8, 2008—*Attorney John Hughes Cooper files Affidavit by physician Shanon Honney, M.D., attesting to her finding that Alice Shaw-Baker is not incapacitated.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This evaluation was an independent evaluation, because Alice did not want to be conserved. She nominated me because she trusted me. (See Dr. Declaration of Dr. Mulbry).**

20. October 9, 2008—*Peter Kouten files visitor report stating, among other things, Ms. Shaw-Baker presented well and the house appeared clean.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

21. October 13, 2008—*Conservator Family Services, Inc., files inventory and appraisal reflecting total net worth of \$388,055.13.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

22. October 26, 2008—*Court's designated Medical Examiner, Dr. William Mulbry, files report stating Alice Shaw-Baker is incapacitated and requires appointment of guardian and conservator*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing. This is an incomplete summary of his statement. It also said that Alice trusted me.**

23. October 29, 2008—*Alice Shaw-Baker and Lisa Fisher file memo in support of appointment of Lisa Fisher as Guardian and Conservator.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This was an appropriate filing and consistent with the known objectives of Alice Shaw Baker.**

24. November 10, 2008—*Judge Curry issues several orders awarding fees to: (1) temporary coguardian Jane Orenstein in the amount of \$2,832.90; (2) temporary co-guardians Orenstein and Kaufmann in the amounts of \$2,571.00 and \$1,747.00; and (3) Attorney C. Mac Gibson for representation of Elisabeth Spencer in the amount of \$7,192.18;*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

25. November 12, 2008—*Judge Curry order granting fees to Court appointed GAL Peter Kouten in the amount of \$3,915.84.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

26. November 19, 2008—*Judge Curry enters order appointing Lisa Fisher as sole guardian and conservator of Alice Shaw-Baker and Lisa Fisher files \$401,700 bond.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to comply with the court's orders.**

27. December 2, 2008—*Peter Kouten files monthly visitor's report.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing. However, this summary is silent, as Alice was doing well.**

28. December 5, 2008—*Judge Curry awards cost to court appointed GAL Peter Kouten in the amount of \$585.00*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

29. December 18, 2008—*Judge Curry authorizes Family Services, Inc., to withdraw \$1,067.00 to pay Jane Orenstein and Family Services files petition for discharge of conservatorship.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

30. December 19, 2008—*Family Services, Inc., files final accounting for period from 08/14/2008- 12/18/2008 showing receipts of \$247,964.99 and Disbursements of \$247,964.99.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.**

31. December 30, 2008—*Letter from John Hughes Cooper stating that Ms. Orenstein appeared at Alice's residence without being invited or making arrangements.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. Jane Orenstein was bothering and upsetting Alice. This is reflected in the**

reports of Peter Kouten. He also sent her a letter. She wanted Alice to be on anti-psychotics. I allowed the attorneys to handle it.

2009

32. January 8, 2009—*Judge Curry Order granting fees to Peter Kouten in the amount of \$690.00 and Lisa Fisher files Neuropsychological Report of L. Randolph Waid, Ph. D.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I complied with all orders of court. I had nothing to do with the order granting fees to Kouten.**

33. January 29, 2009—*Conservator Lisa Fisher files annual report and accounting for period 10/29/08-12/31/08 stating ending balance is \$158,522.01*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had problems understanding the informal accountings. I believe that this was correct, however I more recently had all accountings reconciled with the bank records. Something was wrong initially with the accountings, the new accounting balances and shows no error.**

34. February 25, 2009—*Alice Shaw-Baker's date of death.*

A. **Within minutes of Alice's death, Respondents had made an appointment with Attorney Kouten. They asked the caregiver for the Keys, and I was forced to change the keys. It was a horrible and upsetting experience.**

35. February 27, 2009—*Judge Curry order permitting Lisa Fisher to reimburse herself \$44,530.00 in attorney's fees incurred for representation in this action. Attached is John Hughes Cooper's Affidavit of Attorney's Fees totaling \$44,530.00. In addition, Judge Curry issued order granting GAL fees in the amount \$1,320.00 and discharging GAL.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing**

to do with this filing. These fees were determined and approved by the probate court. I have not seen that part of the file. I don't know that they were reimbursements. I believe that the fees were for Mr. Cooper directly. I will have to look at these documents.

36. March 2, 2009—*Bessie Huckabee files a petition for discharge and a motion for order of termination of conservatorship, filing of final accounting, and distribution of estate assets to court-appointed PR.*

A. This is not accurate. Bessie Huckabee was never appointed conservator.

37. March 10, 2009—Application for informal probate of will and appointment filed in probate court.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.

38. March 11, 2009—*Judge Condon issues certificate of appointment of Bessie Huckabee as Personal Representative of the Estate of Alice Shaw-Baker.*

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.

39. March 25, 2009—*Judge Curry order granting fees by court-appointed GAL in the amount of \$735.00.*

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this filing.

40. April 27, 2009—Betty Fisher and Lisa Fisher file motion for removal to circuit court and a verified complaint in the probate court alleging (1) Constructive trust; (2) Declaratory Judgment; (3) Undue Influence; (4) Fraud; (5) unjust enrichment; (6)

promissory estoppel; (7) Removal of Bessie Huckabee as PR; and (8) appointment of Betty Fisher as PR. In addition, Lisa Fisher files motion for approval of attorney's fees in the amount of \$6,607.50, and a memo and affidavit in support.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker's wishes. The motions for attorney fees are not in possession. However, Mr. Cooper worked diligently to assist Alice in her life.**

41. April 29, 2009—*Lisa Fisher files a memo in opposition to petition for discharge and motion for order of termination of conservatorship and filing of accounting and distribution of estate assets to court-appointed PR, and files a motion for continuance and memo in support.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. Alice had revoked her will, and Bessie Huckabee betrayed Alice. Therefore, I continued to safeguard the property and sought authority.**

42. May 1, 2009—Plaintiffs file Motion for Restraining Order in Probate Court.

A. **I repeat responses to 14 and 15 and 42.**

43. May 7, 2009—*Lisa Fisher files amended motion for approval of attorney's fees in the amount of \$6,090.00 for 32.7 hours worked from November 3, 2008 – February 19, 2009, and a memo and affidavit in support.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker's wishes. The motions for attorney fees are not in possession. However, Mr. Cooper worked diligently to assist Alice in her life.**

44. May 9, 2009—Plaintiffs file amended notice of motion and motion for restraining order in probate court.

A. **I repeat responses to 14 and 15 and 42.**

45. May 11, 2009—*Judge Curry issues order terminating Lisa Fisher's conservatorship, ordering her to provide an accounting, and to turn over all estate assets in her possession to Personal Representative, Bessie Huckabee.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker's wishes and efforts to protect the assets, after their efforts to get the property within minutes of her death.**

46. May 13, 2009—Judge Curry issues Order of Removal to Circuit Court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker's wishes. I had nothing to do with this filing.**

47. May 14, 2009—Motion for Temporary Injunction filed by Plaintiff.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker's wishes. The motion gave no relief, because Huckabee could not get a bond and the court ordered nothing more than the statutory relief.**

48. May 19, 2009—Plaintiff files amended notice of hearing for Motion for Temporary Injunction.

A. **See response to no. 48**

49. May 21, 2009—Lisa Fisher files *pro hac vice* Application and Defendant SC Deferred Compensation Program files Reply to Temporary Injunction indicating it has no position.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker's wishes. I was trying to keep costs down and working with Mr. Cooper to do so.**

50. May 22, 2009—Defendant ING files Reply to Temporary Injunction indicating it has no position and Judge Hughston's form 4 Order temporarily restraining P.R. from doing anything regarding the estate is filed.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with the filing of this document.**

51. May 26, 2009—Letter from Supreme Court filed certifying Lisa Fisher paid \$250 *pro hac vice* application fee, and *Lisa Fisher files final conservator accounting in the probate court. In addition, Judge Condon grants Lisa Fisher a 90 day extension to deliver assets to PR.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. As set forth herein. I did all things to comply with the court orders, and properly asked for an extension.**

52. May 28, 2009—Defendant Bessie Huckabee filed motion for reconsideration of Judge Hughston's May 22, 2009 Order granting Plaintiff's Temporary Injunction, and Defendant National Life Insurance Company files separate Answer and Counterclaim and Cross-Claim by way of Rule 22 Interpleader for insurance benefits in the amount of \$21,454.67.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with the filing of this document.**

53. May 29, 2009—Plaintiffs file Reply to National Life Insurance Company's counterclaim.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I filed all documents as required to prosecute the case.**

54. June 4, 2009—Plaintiffs file memo in opposition to Defendant Huckabee's Motion for Modification and Reconsideration of Temporary Injunction.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. As stated the injunction gave no relief that wasn't already available under the code. I took all action to properly prosecute the case.**

55. June 5, 2009—Defendants Bessie Huckabee, Kay Passailaigue, Sandra Byrd file Answer to Plaintiffs' Complaint.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

56. June 8, 2009—Plaintiffs' Reply to ING Institutional Plan Services' Counterclaim.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I filed all appropriate documents to prosecute the case.**

57. June 10, 2009—Judge Hughston's Order granting Modification of Temporary Restraining Order is filed. The order mutually restrained both parties from disbursing or distributing assets from the estate pending a trial on the merits on all issues in controversy.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. Respondents sought this order, and thereafter failed to comply with the order. The order granted no relief other than the statutory relief, and it included an improper provision relating to Plaintiffs.**

58. June 12, 2009—SC Deferred Compensation Commission’s Answer, Counterclaim and Cross-claim by way of Rule 22 Interpleader for funds in the amount of \$74,002.33

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

59. June 15, 2009—Defendant State Budget and Control Board, SC Retirement System’s Answer, Counterclaim and Cross-claim by way of Rule 22 Interpleader for funds in the amount of \$6,189.36

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. This complaint was in honor of Alice Shaw Baker’s wishes. The motions for attorney fees are not in possession. However, Mr. Cooper worked diligently to assist Alice in her life. I had nothing to do with this document.**

60. June 16, 2009—Judge Condon grants Defendant Bessie Huckabee’s motion for 120 day. extension to file inventory and appraisalment in probate court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with the document.**

61. June 18, 2009—Judge Jefferson grants Lisa Fisher’s *pro hac vice* admission. Additionally, Plaintiffs appeal Judge Hughston’s **interlocutory** order granting modification of the temporary injunction on the basis that the TRO is “fundamentally flawed.” Effective disposition of the case was severely hindered from this point forward.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. It was flawed, and nothing was hindered in this case. It was properly prosecuted. The order did nothing that the statutory provision did. Moreover, Bessie Huckabee did not inform the court that she unlawfully marshaled assets, nor that she could not get a bond.**

62. June 19, 2009—Plaintiff Beatty [sic] Fisher files Motion to set aside void order of informal appointment of Bessie Huckabee as Personal Representative and Defendant Bessie Huckabee files a Motion to reconsider *pro hac vice* application of Lisa Fisher.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. The grounds to remove as pro hac vice were not proper. I did all things to properly prosecute the case.**

63. June 30, 2009—Defendants ING Institutional Plans Services and SC Deferred Compensation Commission file Motion for Interpleader and to Deposit Funds into Court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I supported this petition to protect the assets of Alice.**

64. July 10, 2009—Defendant National Life Insurance Company files Motion for Interpleader and to Deposit Funds into Court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I supported this motion to protect the assets of Alice.**

65. June 16, 2009—Judge Condon grants 120 day extension for PR to file inventory and appraisalment.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this petition.**

66. July 21, 2009—*Lisa Fisher files Motion for approval of fees and Expenses in the amount of \$67,814.50 and memo in support in the Probate Court.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. If she had lived, I would not have sought the monies for work on her behalf. However, Respondents did nothing for her, and it was fundamentally**

unfair for me to have spent all my money to help her, lost money from work, while they tried to reap the rewards.

67. July 27, 2009—*Letter from attorney Kouten stating that the most recent accounting lacks specificity.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I filled the form out the way I was told. As indicated above, I had to turn to a professional, because I was unfamiliar with the South Carolina forms. My updated accounting is specific and balances. No monies were used improperly.**

68. July 30, 2009—Defendant State Budget and Control Board, South Carolina Retirement System's Motion for Interpleader and to Deposit Funds into Court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I supported this petition to protect the assets of Alice.**

69. August 19, 2009—*Judge Curry grants 90 day extension for Lisa Fisher to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I tried to follow all rules before the probate court.**

70. August 21, 2009—Attorney General Henry Dragan McMaster Answers Plaintiffs' Complaint.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

71. August 28, 2009—Not in any file but according to a memo filed by Plaintiff, Defendant filed a Motion for Appointment of Special Administrator.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I would have to see document.**

72. September 4, 2009—Lisa Fisher files proof of claim in the amount of \$67,814.50 on the basis of fees and expenses owed for guardian and conservator.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action as required to prosecute the case and claims.**

73. September 21, 2009—Plaintiff Betty Fisher files memo in opposition to Huckabee's Motion for appointment of special administrator.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to protect the estate.**

74. September 23, 2009—Consent Orders of Interpleader as to ING, S.C. Deferred Compensation, and National Life Insurance Company. Plaintiff also files memo in opposition to Defendants' motion for reconsideration of order granting Lisa Fisher's *pro hac vice* application.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

75. October 12, 2009—Defendants' file Motion to Disqualify Counsel Lisa Fisher and a Consent Order of Interpleader as to State Budget and Control Board is filed.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

76. October 22, 2009—Judge Condon grants 180 day extension for PR to file inventory and appraisalment.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

77. October 27, 2009—Plaintiff files objection to Bessie Huckabee's Motion for an extension to file inventory and appraisalment.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

78. November 3, 2009—Letter from probate court to Plaintiffs' attorney acknowledging receipt of the objection to Defendant's motion for extension but explaining to Plaintiffs that the extensions are necessary for the court's monthly reporting requirements to court administration despite removal of the case to circuit court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this form.**

79. November 20, 2009—*Judge Curry grants 90 day extension for Lisa Fisher to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

80. December 1, 2009—Plaintiff files memo in opposition to Defendant's Motion to Disqualify.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

81. December 2, 2009—Defendant files memo in support of motion to disqualify counsel.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

82. December 4, 2009—Defendants' Motion to Disqualify Counsel is Denied with leave granted to re-file if facts change.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

83. December 21, 2009—Letter from Defendant's attorney to clerk requesting that the court correct the caption on the most recent notice of entry of judgment is filed.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

84. December 29, 2009—Letter from Lisa Fisher to clerk objecting to Defendant's request to correct caption and objecting to line in Defendant's letter informing the clerk to contact his office in regard to any questions on the matter as amounting to *ex parte* communication is filed.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

2010

85. May 7, 2010—Judge Condon grants 180 day extension for PR to file inventory and appraisalment, and closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

86. May 12, 2010—*90 day extension to turn over assets granted by Judge Curry.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

87. May 17, 2010—Plaintiff files objections regarding Bessie Huckabee's Motion for an Extension filed on or about May 5, 2010.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

88. *August 10, 2010—Judge Curry grants 90 day extension for Lisa Fisher to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

89. *November 1, 2010—Probate Judge grants 90 day extension to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

90. *November 10, 2010—Judge Condon grants 90 day extension for Lisa Fisher to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

91. November 16, 2010—Judge Curry grants 120 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did not draft this document.**

2011

92. February 24, 2011—*Jude Curry grants 90 day extension for Lisa Fisher to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

93. March 21, 2011—*Letter from Attorney Kouten alerting court that accountings for the years 2009 or 2010 had not been filed.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

94. March 31, 2011—*Letter from Judge Curry requesting Lisa Fisher to furnish the probate court with a 2009 and 2010 annual accounting.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action, but I did not draft this document.**

95. April 7, 2011—Judge Condon grants 180 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did not draft this document.**

96. May 20, 2011—*Bessie Huckabee files Motion to Appoint Special Fiduciary for Conservatorship Assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. As set forth herein, Judge Fulp informed Jessica Crowley that this was not the appropriate document.**

97. June 1, 2011—*Lisa Fisher files Motion to Strike and Memo in opposition to Bessie Huckabee's Motion to Appoint Special Fiduciary.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

98. June 2, 2011—Court of Appeals file Order dismissing Plaintiff's appeal of the appointment of Bessie Huckabee as PR of the estate of Alice Shaw-Baker and affirming Judge Hughston's order modifying prior temporary restraining order.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did not have anything to do with that document. The court determined it was interlocutory.**

99. August 12, 2011—*Lisa Fisher files objection to Court's Consideration of Huckabee's Motion to Appoint Special Fiduciary.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

100. September 21, 2011—*Lisa Fisher files objection to proposed order by Bessie Huckabee.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

101. September 28, 2011—*Judge Curry issues Order appointing special fiduciary Heyward Harvey and denying Lisa Fisher's Motion to strike and for extension to turn over assets.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action. I had nothing to do with preparation of said document. I believe it was improper, and stated by Judge Fulp.**

102. September 29, 2011—*Lisa Fisher files objection to second, duplicate proposed order by Bessie Huckabee.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

103. October 7, 2011—*Lisa Fisher files Motion for reconsideration of probate court order appointing special fiduciary and denying motion to strike, and Betty Fisher files motion to set aside probate court order appointing special fiduciary and memo in support. Additionally, Lisa Fisher files a renewed motion for approval of fees and expenses of guardian and conservator.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

104. October 13, 2011—Judge Condon grants 120 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

105. October 14, 2011—*Judge Curry issues order Denying Lisa Fisher's Motions for reconsideration and renewed motion for approval of expenses of guardian and conservator. In addition, Judge Curry issues orders freezing any and all assets under the name of Alice Shaw-Baker and/or Lisa Fisher or Alice Shaw-Baker individually being held with Edward Jones Investments, Wachovia, Farmers Merchants Bank, or Bank of America until Heyward Harvey takes control as special fiduciary.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

106. October 20, 2011—*Certificate of appointment is filed certifying Heyward Harvey is the duly qualified special fiduciary and Lisa Fisher files a motion to alter or*

amend the orders freezing assets and a motion to alter or amend denial of renewed motion for approval of fees and expenses of guardian and conservator.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

107. October 25, 2011—*Betty Fisher appeals Judge Curry's order appointing a special fiduciary and order denying motion to set aside order and Lisa Fisher appeals order appointing special fiduciary and denying motion to strike and order denying motion for reconsideration of order appointing special fiduciary.*

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action. The filing of this appeal was proper, as Judge Fulp recently stated that the procedure used was improper and instructed Jessica Crowley how to do it.**

108. November 9, 2011—*Judge Curry issued order denying motion to alter or amend denial of renewed motion for approval of fees and expenses on the basis that Lisa Fisher's role as a conservator ended by order dated May 11, 2009, and Ms. Fisher withdrew monies from the conservatorship without having the legal fiduciary authority to do so. Additionally, Judge Curry issues order denying motion to alter or amend the orders freezing assets.*

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with the drafting of this document, and the conclusions were wrong. That is why Judge Hughston should not have been conducting an independent investigation.**

109. November 21, 2011—*Lisa Fisher appeals Judge Curry order denying motion to alter or amend orders freezing assets and denial of motion to alter or amend denial of renewed motion for approval of fees and expenses of guardian and conservator.*

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I took all appropriate action to prosecute the action.**

2012

110. February 14, 2012—Judge Condon grants 180 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

111. May 6, 2012—*Judge Curry informs Bank of America that temporary restraining order freezing accounts is still in effect until further order of the court.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I have no knowledge of this communication, and why the court would have been communicating with Bank of America.**

112. July 19, 2012—Defendant Bessie Huckabee files a Motion for Hearing on validity of Alice Shaw-Baker's last will and Testament.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

113. July 30, 2012—Supreme Court Order denying certiorari.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

114. August 1, 2012—Plaintiffs file motion to disqualify and remove Defendants counsel and memo in support.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document. This was not the first request to disqualify him. He absolutely refused to recuse himself, despite actual conflict.**

115. September 5, 2012—Judge Condon grants 180 day extension for PR to file inventory and appraisalment, and closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

116. September 13, 2012—Bessie Huckabee files inventory and appraisalment.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

117. September 14, 2012—Defendant Bessie Huckabee files copy of the Inventory and Appraisalment that was filed in the probate court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.** However, this document was not correct.

118. October 4, 2012—Lisa and Betty Fisher file objections to the Inventory and Appraisalment filed by Bessie Huckabee in both circuit and probate case.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did all things to properly prosecute this case. It had to be filed in both, because it was unclear who was handling the estate assets. There was a question of whether the assets were within the control of the circuit court, or not.**

119. October 4, 2012—Betty Fisher also files objection to Inventory and Appraisalment filed by Bessie Huckabee.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

120. November 28, 2012—Defendant’s attorney files memo in opposition to Plaintiff’s motion for disqualification and removal of counsel.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

//

2013

121. March 12, 2013—Judge Condon grants 180 day extension for pr to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

122. August 6, 2013—W. Westbrook Wills III files notice of appearance.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

123. September 3, 2013—Defendant’s Motion for Summary Judgment is granted in case # 2009-CP- 10-1332

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.** The courts independent investigation of this action was improper.

124. September 16, 2013—Judge Condon grants 180 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

125. September 27, 2013—Defendant Bessie Huckabee files Motion to Bifurcate along with Affidavit by Bessie Huckabee.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

126. October 4, 2013—Plaintiffs file objection to Westbrook Wills' Notice of Appearance and file objection to Defendant's motion to bifurcate.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

127. October 14, 2013—Consent order filed substituting Westbrook Wills III in place of Peter Kouten as counsel for Defendants.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document and it was not properly served on plaintiffs.**

2014

128. February 4, 2014—Judge Nicholson files Order Denying Plaintiff's Motion to Disqualify.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

129. February 6, 2014—Plaintiffs file supplemental memo in opposition to motion to bifurcate.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

130. February 18, 2014—Plaintiffs file motion to reconsider order denying motion to disqualify, memo in support, and affidavit by Lisa Fisher.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

131. March 24, 2014—Judge Condon grants 180 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

132. May 7, 2014—Judge Nicholson files order denying Plaintiffs' Motion to reconsider denial of motion to disqualify.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

133. June 10, 2014—Plaintiffs file notice of appeal regarding Judge Nicholson's denial of Plaintiffs' Motion to Disqualify.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

134. August 18, 2014—Defendants file Motion for hearing and *Judge Nicholson's order affirming probate court's order appointing special fiduciary, freezing assets, and denying motions to reconsider.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

135. September 19, 2014—*Betty Fisher files notice of intent to appeal Judge Nicholson's order.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

136. October 8, 2014—Judge Condon grants 180 day extension for PR to file closing documents.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

2015

137. April 13, 2015—Judge Condon grants 120 day extension for PR to file closing documents.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

138. August 31, 2015—Judge Condon grants 120 day extension for PR to file closing documents and accounting.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

2016

139. January 19, 2016—Judge Condon grants 180 day extension for PR to file closing documents.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

140. June 22, 2016—Remittitur from Supreme Court filed denying Plaintiffs petition for writ of cert.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

141. June 27, 2016—Court of Appeals Order is filed denying plaintiffs' petition for rehearing.

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

142. August 19, 2016—Judge Condon grants 180 day extension for PR to file closing documents.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

143. August 22, 2016—Court of Appeals Order is filed granting costs in the amount of \$500 to the Defendants.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

144. December 21, 2016—*Court of Appeals release unpublished opinion Affirming the circuit court's affirmance of the probate court's order appointing a special fiduciary, freezing assets, and denying motions to reconsider, and remanding Lisa Fisher's request for fees to the probate court.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

2017

145. January 17, 2017—Consent Motion for May 15, 2017, date certain.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

146. February 16, 2017—*Letter from Defendants attorney requesting that Lisa Fisher be required to provide annual accountings of the estate's assets for the years 2011, 2012, 2013, 2014, 2015, and 2016.*

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

147. February 24, 2017—*Betty and Lisa Fisher's petition for rehearing in the Court of Appeals is denied.*

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

148. March 21, 2017—*Fisher's attorney responds to letter asking for accounting by stating the matter is beyond the jurisdiction of the probate court due to pending appeals.*

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did all things to properly prosecute this case.

149. March 28, 2017—*Lisa and Betty Fishers' petition for writ of cert regarding the Court of Appeals December 21, 2016 unpublished opinion is filed in the SC Supreme Court.*

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

150. April 4, 2017—*Bessie Huckabee files motion for accounting.*

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

151. April 25, 2017—Judge Curry signs order substituting Jessica Crowley for Peter A. Kouten and attorney for Bessie Huckabee.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

152. April 26, 2017—Judge Condon grants 90 day extension for PR to file closing documents.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

153. May 12, 2017—*Order from probate court is filed substituting Jessica Crowley as counsel for defendants in place of Peter Kouten.*

- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**
154. May 30, 2017—Supreme Court Order filed denying Defendants motion to strike portions of the petitioner’s brief.
- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**
155. August 2, 2017—Defendants file motion for summary judgment.
- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**
156. August 4, 2017—Defendants file amended motion for summary judgment.
- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**
157. August 16, 2017—*Date of Supreme Court Order disqualifying Judge Condon and the Associate Probate Judges of Charleston County, and transferring probate case to Judge Fulp in Beaufort.*
- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.** Although I support any transfer from Charleston County.
158. October 2, 2017—Plaintiffs file motion to change venue to Beaufort county, vacate date certain, and for a stay of all hearings pending Supreme Court ruling on petition for cert. Lisa Fisher also files affidavit in support of motion.
- A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**
159. October 18, 2017—affidavit by Joan Hadwin and attorney Donald Budman filed attesting to validity of will.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

160. October 19, 2017—Defendants file memo in opposition to plaintiffs' motion to change venue, vacate date certain, and for a stay. Additionally, Judge Jefferson files Order denying motion to change venue, vacate date certain, and for a stay on the following grounds: (1) Date certain trial was set to begin in three days; (2) two weeks had already been allotted for trial; and (3) motion to stay ruling on writ of cert pertaining to another case with the same parties but was unrelated to the present case.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

161. October 23, 2017—Plaintiffs file motion to disqualify Judge Hughston on the grounds that he granted the modified temporary restraining order which was requested by the parties, motion for reconsideration of order denying motion to change venue, vacate date certain, and for stay on all matters. Plaintiffs also file notice of appeal of order denying motion to change venue, vacate date certain, and to stay. In addition, Judge Jefferson files order denying plaintiffs motion for reconsideration.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.

162. October 26, 2017—Jury verdict finding Alice Shaw-Baker's Last Will and Testament valid.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.

163. November 3, 2017—Plaintiffs file motion for date certain to hear severed trial on other causes of action, for a new trial, and for reconsideration of denial of Plaintiffs motion to amend its complaint to conform to evidence to reform the will as well a memo and affidavit in support.

A. I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.

164. November 6, 2017—Defendants file post-trial motions for sanctions under SC Frivolous Proceedings Act and Defendants file Motion to Dissolve Temporary Restraining Order.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.** Although we vigorously opposed said document.

165. November 16, 2017—Court of Appeals order dismissing Plaintiffs appeal of Judge Jefferson's order denying motion to change venue, vacate date certain, and to stay, and on denial of plaintiff's motion to disqualify Judge Hughston on the grounds that such matters are not immediately appealable.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

166. December 6, 2017—Plaintiffs file memo in opposition to Defendants' post-trial motions.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did everything to properly prosecute this case.**

167. December 27, 2017—Order assigning all matters to Judge Hughston.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did not have anything to do with this motion, however the order is very vague as to "cases currently filed.**

2018

168. January 2, 2018—Defendant files renewed motion for summary judgment on remaining causes of action and response to plaintiffs' memo in opposition to Defendants' post-trial motions.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

169. January 25, 2018—Judge Hughston requiring parties to furnish him with all information regarding the most recent accounting to the Probate Court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document. This was opposed in the pre-trial brief by plaintiffs.**

170. January 30, 2018—Judge Hughston order checking on status of updated accounting and scheduling a pre-trial hearing.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

171. February 5, 2018—Letter from Defendants in regard to Judge Hughston's order for an updated accounting.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

172. February 6, 2018—Judge Hughston's order requiring Plaintiffs to furnish any missing information to him at pre-trial hearing and all bank records relative to Conservator accounts.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

173. February 8, 2018—date of letter sent to Judge Hughston from Lisa Fisher objecting to Defendants letter, furnishing requested materials, arguing prejudice, and expressing concerns over imposing on Supreme Court jurisdiction.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

174. February 9, 2018—Judge Hughston's filed reply letter to Lisa Fisher stating that what he has requested is relevant and ordered her to provide accounting in simple form.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

175. February 14, 2018—Accounting by Lisa Fisher is filed.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had filed this in the proper court of Judge Fulp. I objected to the consideration by Judge Hughston.**

176. February 16, 2018—Judge Hughston email changing pretrial hearing to Beaufort for everyone's convenience.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

177. February 22, 2018—Judge Hughston order requiring any discovery done in the present case or any corresponding case be turned over to him.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.** However, I have objected throughout these proceedings to the production of these documents.

178. February 26, 2018—Lisa Fisher files amended accounting with attachments, motion to strike Feb. 2, 2018 letter form Defendants' counsel, affidavit of John Hughes Cooper, memo in opposition to Defendants' renewed motion for summary judgment, pre-trial brief, and an affidavit of Albert Bilbrey.

A. **This is unclear. See response to 176**

179. February 28, 2018—Plaintiffs file reply to Defendants' Response to Plaintiffs' Post-Trial Motions. Additionally, Judge Hughston files order confirming the parties had a pre-trial hearing as scheduled and ordering both parties to be prepared to present evidence they wish to present at Trial on March 12 concerning any legal and factual matters.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I did all things to properly prosecute this case.**

180. March 7, 2018—Correspondence from Defendants' attorney to Judge Hughston is filed that raises the issue of Plaintiffs' standing and cites the South Carolina Supreme Court's decision in a companion case declaring Plaintiffs did in fact lack standing to bring claims on behalf of the estate.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

181. March 14, 2018—Judge Hughston files Order confirming his oral Order requiring Lisa Fisher to produce financial statements showing her net worth and net income for 2017, and informing her that failure to do so may result in civil contempt of court.

A. **I repeat responses to 14 and 15 with regards to this document. I did all things out of love for Alice Shaw Baker, my great aunt. I had nothing to do with this document.**

182. I believed that the facts supported the law in this case, and that the claims were warranted under existing law or that an extension, modification, or reversal of law was available with regard to these legal proceedings.

183. Further, I believed based on my conversations with my great aunt, Alice Shaw Baker, and that there were documents which supported my conversations with her that her estate was going to animal charities, that proceeding with this litigation was not only proper but consistent with her desires. It was my wish, only, to make sure that her desires were followed.

184. I did not intend EVER to delay, harass, or injure any other party. I was aware that my daughter Lisa Fisher was paying from her personal funds to maintain her [Alice Shaw Baker's] property, pay property taxes, pay insurance, and all other related expenses during the appeal process. I believed that these payments prevented waste to the property and allowed it to accrue in value, so that no losses to my aunt Alice Shaw-Baker's estate would take place.

185. I am requesting that the court preserve the status quo to protect Alice Shaw Baker's property, pending resolution of the appeal.

186. I verify that all the statements herein are true and correct and that I know or believe the content and allegations are true to the best of my knowledge except for those matters stated which are alleged on information and belief.

187. FURTHER, AFFIANT SAYENT NAUGHT.

By: _____

Lisa Fisher

Subscribed and sworn to before me

This _____ day of February, 2018.

(SEAL)

Notary Public

My Commission Expires: _____

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California, County of Los Angeles

Subscribed and sworn to (or affirmed) before me

on this 7 day of April, 2018.

by Lisa Fisher

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature: [Handwritten Signature]

