

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Circuit Court

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No.: 2018-000562

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AUG 20 2018
SC Court of Appeals

Mary P. Smith, Maezell Mitchell Jefferson, individually and as Personal Representative of the Estate of Annabelle Thornton, Shirrese B. Brockington, as Special Administrator of the Estate of Janine Gourdine, Emma Smalls, Viola Pringle, Cephus Thornton, Arthur Graddick, III, an imprisoned person, Venetra Watson, and any known or unknown persons or entities claiming any interest in the Estates of Lucinda Pringle, Odessa Graddick, Arthur Graddick, Jr., Annabelle Thornton and Janine Gourdine,Appellants,

v.

Angus M. Lawton, Personal Representative of the Estate of Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr. and unknown Personal Representative of the Estate of Rebecca Patricia Brown,Respondents.

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

Respondents propose the following to be included in the Record on Appeal:

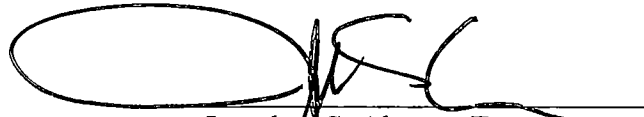
1. Last Will & Testament of Lucinda Pringle;
2. Application for Appointment (Lucinda Pringle) dated 05/05/1999;
3. Renunciation of Right (Emma Smalls) dated 05/05/1999;
4. Renunciation of Right (Mary P. Smith) dated 05/05/1999;
5. Renunciation of Right (Annabelle Thornton) dated 05/05/1999;
6. Death Certificate (Elizabeth Washington) dated 05/05/1999;
7. Notice to Creditors dated 05/05/1999;
8. Fiduciary Letters dated 05/05/1999;
9. Certificates of Appointment dated 05/05/1999;
10. Affidavit of Publication dated 07/19/1999;

11. Proof of Delivery dated 08/17/1999;
12. Inventory and Appraisement dated 08/17/1999;
13. Notice of Hearing dated 07/11/2000;
14. Renunciation of Right (Emma Smalls) dated 03/22/2001;
15. Application for Successor Personal Representative dated 03/22/2001;
16. Death Certificate (Jannie Gourdine) dated 03/22/2001;
17. Renunciation of Right (Mary P. Smith) dated 03/22/2001;
18. Fiduciary Letters dated 03/22/2001;
19. Probate Court's Affidavit dated 04/17/2001;
20. Deed of Distribution dated 04/17/2001;
21. Probate Court Package Returned dated 04/20/2001;
22. Accounting dated 05/25/2001;
23. Proposal for Distribution dated 05/25/2001;
24. Petition for Settlement dated 05/25/2001;
25. Notice of Right to Demand Hearing dated 05/25/2001;
26. Proof of Delivery dated 05/25/2001;
27. Certificate of Discharge dated 06/26/2001;
28. Death Certificate (Lucinda Pringle) dated 08/04/2005;
29. Notice of Hearing dated 10/21/2005;
30. Proof of Delivery dated 11/21/2005;
31. Fiduciary Letters dated 01/04/2006;
32. Proof of Delivery dated 01/19/2006;
33. Motion for Extension dated 05/15/2006;
34. Notice of Hearing dated 05/04/2007;
35. Proof of Delivery dated 05/07/2007;
36. Affidavit of Publication dated 06/05/2007;
37. Transcript of Record dated April 18, 2008 before the Honorable Irvin G. Condon;
38. Order of the Honorable Irvin G. Condon dated 10/20/2008;
39. Appellants' Notice of Appeal dated 10/30/2008;
40. Transcript of Record dated April 29, 2009 before the Honorable Roger M. Young;
41. Order of the Honorable Roger M. Young dated 06/24/2009;
42. Appellants' Notice of Appeal dated July 27, 2009;
43. All briefs and filings by parties relative to Appellate Case No. 2009-134171;
44. All matters identified in the Respondents' Designation of Matter and Record on Appeal from Appellate Case No. 2009-134171;
45. Court of Appeals' Opinion filed August 9, 2011;
46. Order of the Honorable Irvin G. Condon dated 03/24/2013;
47. Respondents' Notice of Intent to Appeal and Notice and Motion to Amend/Alter dated 04/05/2013;
48. Order of the Honorable Irvin G. Condon dated December 20, 2013;
49. Respondents' Notice of Motion and Motion to Dismiss Appeal dated 03/10/2014;
50. Court of Appeals Order dated 03/14/2014;
51. Respondents' Notice of Motion and Motion to Dismiss and Brief Supporting Motion to Dismiss dated 02/20/2015;
52. Petitioners' Memorandum in Opposition to Respondents' Motion to Dismiss dated 03/18/2015;

53. Order of the Honorable Irvin G. Condon dated 06/28/2015;
54. Respondents' Notice of Motion and Motion to Amend or Alter Order of Probate Court dated 07/14/2015;
55. Petition for Formal Testacy dated February 9, 2016;
56. Transcript of Proceedings dated November 9, 2016;
57. Order of the Honorable Irvin G. Condon dated January 18, 2017;
58. Transcript dated February 1, 2018 before the Honorable Kristi L. Harrington; and
59. Order of the Honorable Kristi L. Harrington dated March 26, 2018.

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

August 17, 2017



Jonathan S. Altman, Esq.
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Attorney for Respondents

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Arthur Graddick, III, an imprisoned person, Venetra Watson, and
any known or unknown persons or entities claiming any interest in
the Estates of Lucinda Pringle, Odessa Graddick, Arthur Graddick, Jr.,
Annabelle Thornton and Janine Gourdine,Appellants,

v.

Angus M. Lawton, Personal Representative of the Estate of
Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr.
and unknown Personal Representative of the Estate of Rebecca
Patricia Brown,Respondents.

PROOF OF SERVICE

I hereby certify that Respondents' Initial Brief and Designation of Matter to be Included
in the Record on Appeal have been served via U.S. Mail, properly addressed to the following
counsel of record on August 17, 2018:

T. Jeff Goodwyn, Jr., Esq.
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, SC 29205

Attorney for Appellants

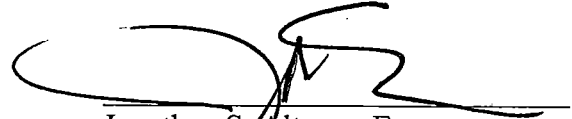
Angus M. Lawton, Esq.
496 Bramson Court, Suite 100
Mt. Pleasant, SC 29464

PR of the Estate of Lucinda Pringle

Ayesha T. Washington, Esq.
The Washington Law Firm, LLC
P.O. Box 30026
Charleston, SC 29417

*Attorney for Appellants/
Special Administrator*

August 17, 2018



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Charleston, SC 29401

Attorney for Respondents

D · & · A

DERFNER
& ALTMAN

August 17, 2018

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: Mary P. Smith, et al. v. Angus M. Lawton, et al.
Appellate Case No. 2018-000562

Dear Ms. Kitchings:


Please find enclosed an original and one copy of the following relative to the above referenced matter:

1. Respondents' Initial Brief and Designation of Matter; and
2. Proof of Service upon Appellants' counsel of same.

Please file the originals and return clocked-in copies to me in the enclosed self-addressed stamped envelope. Please contact me with any questions you may have regarding the above matter.

Yours Very Truly,

DERFNER & ALTMAN, LLC


Jonathan S. Altman

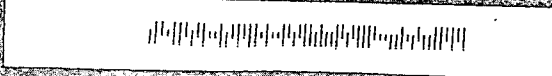
JSA/rs

Enclosures

cc: Stephen M. Slotchiver, Esq.
Angus M. Lawton, Esq.
T. Jeff Goodwyn, Jr., Esq.
Ayesha Washington, Esq.

ARMAND DERFNER | SAMUEL H. ALTMAN | JONATHAN S. ALTMAN

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