

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

J.C. Nicholson, Jr., Circuit Court Judge

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Case No. 2014-CP-10-5355  
Appellate Case No. 2016-000748

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**RECEIVED**  
OCT 18 2018  
SC Court of Appeals

IN RE: ESTATE OF NORMAN ROBERT KNIGHT, JR.,  
(deceased), ESTATE OF MILDRED C. KNIGHT, (deceased), and NORMAN ROBERT  
("Bobby") KNIGHT, III,

Appellants,

-versus-

BEATRICE E. WHITTEN, AS A SPECIAL ADMINISTRATOR,  
and CHLOE KNIGHT-TONNEY, CLAIMANT,

Respondents.

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**RESPONSE OF RESPONDENT  
SPECIAL ADMINISTRATOR, BEATRICE E. WHITTEN  
TO APPELLANT'S PETITION FOR REHEARING**

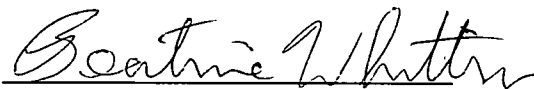
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The Respondent, Special Administrator Beatrice E. Whitten, responds to the Appellant's  
Petition for Rehearing as follows:

South Carolina Appellate Court Rule (SCACR) 221 provides that a petition for rehearing

“shall state with particularity the points supposed to have been overlooked or misapprehended by the court.” Appellant has instead simply repeated exactly the same issues and arguments which have now been heard at length and ruled upon by a trial judge, a circuit judge on appeal, and by this Court on appeal.

There are no grounds for a rehearing or reconsideration. The appellant has managed to delay the completion of probate for this simple estate for over ten years. The petition for rehearing should be promptly dismissed.



Beatrice E. Whitten, Respondent  
Special Administrator  
1110 Queensborough Blvd., Suite 100  
Mt. Pleasant, SC 29464

Charleston, South Carolina

October 15, 2018

Other Counsel of Record:

J. Seth Whipper, Esquire  
PO Box 70070  
Charleston, SC 29415  
(843) 740-7777  
Attorney for Appellants

C. Mac Gibson, Jr., Esquire  
1473 Stuart Engals Blvd.  
Mount Pleasant, SC 29464  
(843) 852-4646  
Attorney for Respondent Chloe Tonney

THE STATE OF SOUTH CAROLINA

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APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2014-CP-10-5355

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In Re: Estate of Norman Robert Knight, Jr., (deceased), Estate of Mildred C. Knight, (deceased),  
and Norman Robert "Bobby" Knight, III,

Appellants,

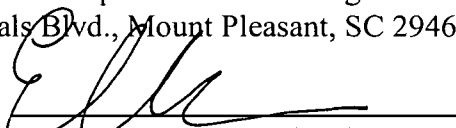
-versus-

Beatrice E. Whitten, as a special administrator, and Chloe Knight-Tonney, Claimant,

Respondents.

**PROOF OF SERVICE**

I certify that I have served Respondent Beatrice E. Whitten's Response of Respondent Special Administrator Beatrice E. Whitten to Appellant's Petition for Rehearing to Appellants and to Respondent Chloe Knight-Tonney by depositing copies in the United States Mail, postage prepaid, on October 15, 2018 addressed to Appellants' attorney of record, J. Seth Whipper, P.O. Box 70070, North Charleston, SC 29405 and to Respondent Chloe Knight-Tonney's attorney of record, C. Mac Gibson, Jr., 1473 Stuart Engals Blvd., Mount Pleasant, SC 29464.

  
Elizabeth Castle, paralegal to  
Beatrice E. Whitten  
Special Administrator  
1110 Queensborough Blvd., Suite 100  
Mt. Pleasant, SC 29464

October 15, 2018

BEATRICE E. WHITTEN  
Attorney and Mediator  
1110 Queensborough Blvd., Suite 100  
Mount Pleasant, SC 29464

Phone 843-881-1399

Fax 843-881-6695

October 15, 2018

CERTIFIED MAIL RETURN RECEIPT REQUESTED: 7017-2400-0000-0264-4980

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

Re: In Re: Estate of Norman R. Knight, Jr., (deceased), Estate of Mildred C. Knight (deceased),  
and Norman Robert "Bobby" Knight, III, v. Beatrice E. Whitten, et al.  
Appeal from Charleston County Court of Common Pleas  
Case No.: 2014-CP-10-5355  
Appellate Case No.: 2016-000748

Dear Ms. Kitchings:

Enclosed please find the originals and six copies of Ms. Whitten's Response of Respondent Special Administrator, Beatrice E. Whitten, to Appellant's Petition for Rehearing, along with a Proof of Service. Kindly send the filed copies back to me in the envelope provided.

By a copy of this letter, I am sending a copy of the above-referenced documents to counsel of record.

If you should have any questions, please do not hesitate to contact this office.

With kind regards, I remain

Sincerely,



Elizabeth Castle  
Paralegal

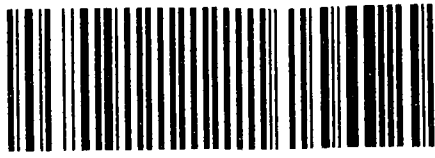
Enclosures (as stated)

cc: C. Mac Gibson, Jr., Esquire (with enclosures)  
J. Seth Whipper, Esquire (with enclosures)

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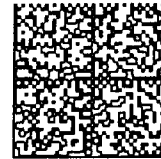
SC Court of Appeals



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Beatrice E. Whitten, Esq.  
1110 Queensborough Blvd., Suite 100  
Mount Pleasant, SC 29464

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SC Court of Appeals



The Honorable Jenny Abbott Kitchings  
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