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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell Scarborough  
Master-in-Equity

Case No. 2018-000761

RECEIVED  
FEB 20 2019  
SC Court of Appeals

Vanessa Williams, Vanessa Williams, as  
Conservator and Guardian of Sandra P. Perkins,  
and Vanessa Williams, as Personal Representative  
of the Estate of Sandra P. Perkins ..... Respondents,

v.

Bradford Q. Jeffcoat, Jr. and  
Blue Heron Builders, Inc. .... Defendants,  
*of whom*  
Bradford Q. Jeffcoat, Jr. is ..... Appellant.

MOTION TO SUPPLEMENT RECORD

Jason Scott Luck  
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Attorney for Appellant

Appellant Bradford Jeffcoat, pursuant to Rule 212, SCACR, moves to supplement the Record on Appeal with the attached proposed Appendix to the Record on Appeal. Jeffcoat would show the following in support of his motion:

This is a so-called “granny snatching” case,<sup>1</sup> where Respondent Vanessa Williams absconded to Alabama with her demented mother (Sandra Perkins), taking her from the Charleston County home she owned for fifteen years as a joint tenant with right of survivorship with her companion, Appellant Bradford Jeffcoat. Once in Alabama, Williams became Perkins’ guardian and conservator. Williams used her mother’s assets to support Perkins in her illness, but she also used these assets to pay a down payment for a mobile home, pay her daughter’s college tuition, and generally support her family. As Perkins entered her final illness, Williams transferred Perkins’ interest in her Charleston home to Williams and then sought the partition and sale of the home, which is where Jeffcoat currently lives.

The parties seek to supplement the record with: (1) filings of record from the Baldwin County Probate Court for In re Perkins, Case No. 32367, the guardianship/conservatorship proceeding regarding Sandra Perkins, Williams’ mother; (2) a Health Care Power of Attorney of Sandra P. Perkins; and (3) a Durable Springing

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<sup>1</sup> Judge David Herndon of the Southern District of Illinois describes this phenomenon:

Of particular concern is a tactic known as “granny snatching.” The AARP has described granny snatching as “a deplorable tactic by which someone who wants control over a vulnerable individual and their assets — usually when there’s a sizeable estate involved — ‘snatches’ that individual across state lines and immediately files for guardianship, preventing control or contact with the individual by other family members.”

Easterly v. Burgett, No. 3:16-cv-00288-DRH-SCW (S.D.Ill. Order dated October 26, 2016) (footnotes removed) *available at* <https://ecf.ilsd.uscourts.gov/doc1/06913629338> (last visited November 19, 2018).

Power of Attorney of Sandra P. Perkins, filed of record with the Charleston County Register of Mesne Conveyance (now Register of Deeds) on December 1, 2009. These documents are attached as a proposed Appendix to the Record on Appeal.<sup>2</sup>

Motions to supplement the record are governed by Rule 212, SCACR:

**RULE 212  
SUPPLEMENTAL RECORD**

**(a) By the Court.** The appellate court may require copies of all or any part of the transcript of proceedings or other matter which was before the lower court or administrative tribunal to be sent up for its inspection and consideration. It may likewise require a report of the trial or hearing, or of any matter relative thereto, to be made by the trial judge or administrative tribunal. These matters shall become part of the Record on Appeal.

**(b) By a Party.** With the written consent of all attorneys of record, a party may supplement the Record on Appeal at any time before argument commences. Without such consent or after argument commences, a party desiring to supplement the Record on Appeal must move the appellate court for leave to do so. [<sup>3</sup>] In response to that motion, the other party(s) shall designate any supplemental materials which that party desires to add if the Court grants the motion.

**(c) Appendix.** Supplemental materials filed under Rule 212(b) shall be included in an Appendix to the Record on Appeal. Unless otherwise agreed by the parties or ordered by the Court, the Appendix shall be compiled, served and filed by the party initially proposing it.

All parties to this appeal consent to the supplementation of the record with the attached documents, and, in reliance on each other's consent, have referenced them in their initial briefs, which are of record with this Court. Jeffcoat would therefore ask this Court to allow him to supplement the Record on Appeal with the attached proposed Appendix to the Record on Appeal. Jeffcoat further requests guidance from this Court as

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<sup>2</sup> The Appendix to the Record on Appeal's page numbers begin at 305 in order to maintain continuity with the Record on Appeal.

<sup>3</sup> The parties have previously agreed to include all these materials in the Appendix to the Record on Appeal. However, Court of Appeals staff have recently informed counsel for Jeffcoat that a motion to supplement the record was nonetheless necessary.

to whether a bound Appendix to the Record on Appeal is necessary, or if the copies provided with this motion are sufficient (thus saving copy costs).

Dated:

2/19/19



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**Attorney for Appellant**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Mikell Scarborough  
Master-in-Equity

Case No. 2018-001464

**RECEIVED**  
FEB 20 2019  
SC Court of Appeals

Vanessa Williams, Vanessa Williams, as  
Conservator and Guardian of Sandra P. Perkins,  
and Vanessa Williams, as Personal Representative  
of the Estate of Sandra P. Perkins..... Respondents,

v.

Bradford Q. Jeffcoat, Jr. and  
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*of whom*  
Bradford Q. Jeffcoat, Jr. is .....Appellant.

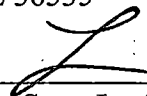
CERTIFICATE OF SERVICE

I certify that I have served the Initial Reply Brief and Motion to Supplement  
Record by depositing a copy of them in the United States Mail, postage prepaid, on The  
date below to the following persons:

Andrew M. Sullivan  
Clawson and Staubes, LLC  
1612 Marion Street, Suite 200  
Columbia, SC 29201

Drew Wenzel  
Caldwell Wenzel & Asthana, PC  
218 N. Alston St.  
Foley, AL 36535

Date: 2/15/19

  
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<sup>15</sup>/<sub>14</sub> February 2019

Jenny Abbot Kitchings  
Clerk of Court  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
FEB 20 2019  
SC Court of Appeals

Re: *Williams v. Jeffcoat*, 2018-001464

Dear Ms. Kitchings:

Please find enclosed the following: (1) Appellant's Initial Reply Brief, (2) Appellant's Motion to Supplement Record (original and six copies), (3) a check for \$50.00, and (4) a certificate of service.

Please do not hesitate to contact me with any questions.

With Highest Regards,



Jason Scott Luck

/JSL



cc: Andrew M. Sullivan, Attorney for Respondents  
Drew Wenzel, Attorney for Respondents

**GARRETT LAW OFFICES, LLC**  
ATTORNEYS AT LAW  
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FEB 20 2019  
SC Court of Appeals

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