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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY

Court of Common Pleas

Patrick R. Watts, Special Referee

Case No. 2013-000608

Irving T. Geddis, Jr., Harry M. Carroll, Barbara C. Stancil, & Joanne C. Wade.....Respondents,

v.

Rebecca Geddis, Patricia Ann Geddis, Cleveland Geddis, John Henry Geddis, Herman Geddis, George Geddis, Patrice Geddis, Joenatham Geddis, Yvonne Geddis Bowens, Gwendolyn P. Spell, Harry P. Geddis, Catherine Goodwine a/k/a Catharine Goodwine, Jessie Goodwine, and any individual who may be claiming an interest in this action as an heir of these individuals, and MWV Community Development and Land Management, LLC, and John Doe and Jane Doe, fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors or assigns of the Defendants named above, and Richard Roe and Mary Roe, fictitious names designating infants and persons under any disability or incompetent, including those persons who might be in the Military Services within the meaning of The Soldier's and Sailor's Civil Relief Act of 1941, Title 50, United States Code, and any other person or legal entity who or which has or claims to have any right title, interest or lien in or to the real property described in this Complaint, Defendants,

Of whom Patrice Geddis is the.....Appellant.

RECORD ON APPEAL

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Appellants

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STATE OF SOUTH CAROLINA)
COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2007-CP-18-_____

IRVING T. GEDDIS, JR., HARRY M. CARROLL,
BARBARA C. STANCIL, & JOANNE C. WADE)

Plaintiff,)

v.)

REBECCA GEDDIS, PATRICIA ANN GEDDIS,)
CLEVELAND GEDDIS, JOHN HENRY GEDDIS,)
HERMAN GEDDIS, GEORGE GEDDIS, PATRICE)
GEDDIS, JOENATHAM GEDDIS, LUCIUS)
GOODWINE a/k/a LUCIOUS GOODWINE)
CATHERINE GOODWINE a/k/a CATHARINE)
GOODWINE, JESSIE GOODWINE, and any)
individual who may be claiming an interest in this)
action as an heir of these individuals, and)
MEADEWESTVACO FORESTRY LLC, and)
JOHN DOE AND JANE DOE, fictitious)
names designating the unknown heirs, devisees,)
distributees, issue, executors, administrators,)
successors or assigns of the Defendants named)
above, and RICHARD ROE AND MARY ROE,)
fictitious names designating infants and persons)
under any disability or incompetent, including)
those persons who might be in the Military Services)
within the meaning of The Soldier's and Sailor's)
Civil Relief Act of 1941, Title 50, United States)
Code, and any other person or legal entity who)
or which has or claims any right title, interest or)
lien in or to the real property described in this)
Complaint,)

Defendants.)

COMPLAINT

Suit to Quiet Title/Non-Jury

COMES NOW Plaintiffs IRVING T. GEDDIS, JR., HARRY M. CARROLL, BARBARA C. STANCIL, AND JOANNE C. WADE, complaining of Defendants, and would show as follows:

1. Plaintiffs bring this action pursuant to South Carolina's Uniform Declaratory Judgments Act, Sections 15-53-10, et seq., Code of Laws of South Carolina (1976), as amended, seeking an order from this Honorable Court declaring that they and certain others own fee simple absolute title in and to the real property which is the subject of this suit (Property), free and clear of all claims.

2. Plaintiffs are residents of Maryland and New York and claim an interest in the Property.

3. Upon information and belief, Defendant MEADWESTVACO FORESTRY, LLC, is a Limited Liability Company organized and existing under the laws of Delaware, and authorized to do business in South Carolina, and owns real property in Dorchester County, South Carolina.

4. Plaintiffs are informed and believe all other Defendants are or were residents of Dorchester County or outside South Carolina and/or may claim some interest in the Property.

5. The real property that is the subject of this suit is situated in Dorchester County, South Carolina and for purposes of this suit is described as follows ("the Property"):

ALL that certain, piece, lot or tract of land containing 54.03 acres, more or less, all as more fully shown on a Plat entitled "Boundary Survey of 54.03 acres owned by Irving T. Geddis & Irma Carroll Geddisville Area Dorchester County, South Carolina," by Robert J. Sample, P.E. R.L.S., September 12, 2006, said plat being recorded in Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006.

BEING the same property conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

TMS No.: 174-00-00-007

5. All matter alleged to be recorded is alleged to be recorded in the Dorchester County RMC's Office or the Dorchester County Probate Court, as appropriate. All allegations of examinations of public records are alleged to be examinations of public records in Dorchester County government departments.

6. On or about April 8, 2002, Plaintiff Irving T. Geddis and his sister, Irma Carroll, a/k/a Irma G. Carroll, instituted a declaratory judgment action in the Dorchester County Court of Common Pleas, Case No. 2002-CP-18-593, in order to quiet title in them to the real property described as follows:

ALL that certain, piece, lot or tract of land containing thirty-five and one third ($35 \frac{1}{3}$) acres, more or less, situate, lying and being in the County of Colleton and State aforesaid, situated near the Edisto River and having the following boundaries to-wit North by lands of James Perry; South by lands of Richard Geddis, East by lands of Mrs. Regina Yonahan and West by lands of Isaac Singleton.

BEING the same premises conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

7. On or about January 12, 2004, Dorchester County Master-in-Equity, the Honorable Patrick R. Watts, entered a Master's Report and Order quieting title in the real property described in paragraph 6 above to Irving T. Geddis, Jr. and Irma Carroll.
8. Irma Carroll passed away on or about May 4, 2004, and all her interest in the real property described in paragraph 6 above was transferred to her children, Harry M. Carroll, Barbara C. Stancil, and Joanne C. Wade, by Deed of Distribution filed with the Dorchester County RMC's Office at Book 5189, Page 237, on or about February 8, 2006.
9. After the January 12, 2004, Master's Report and Order quieted title to Irving and Irma, Irving had the Property surveyed. A copy of the resulting plat is attached hereto as Exhibit A. A copy was also recorded in the Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006.
10. As a result of this survey, Irving learned that the parcel of real property identified by Dorchester County TMS No. 174-00-00-007 actually contains approximately 54.03 acres, more or less, rather than $35 \frac{1}{3}$ acres as stated in the previous suit to quiet title and deeds.
11. Plaintiffs are informed and believe that the description in the 1954 deed to Irving T. Geddis, a/k/a as Irving T. Geddis, Sr., being the same legal description used in the previous suit to quiet title and allegedly only containing $35 \frac{3}{4}$ acres, arose from a 1918 plat by C.E. Durant entitled "Plat of Thirty Five and Three Fourth Acres of land situated on Block Hill South of Givhans Ferry, county and state aforesaid said land out of Richard Washington Estate for Harry Geddis, as per will."

dated September 24, 1918. Prior to ownership transferring to Irving and Irma by Deed of Distribution from estate of Irving T. Geddis, Sr., ownership of the Property transferred from the heirs of Harry Geddis into Irving T. Geddis a/k/a Irving T. Geddis, Sr., by deed filed with Dorchester County RMC's Office at Book 109, Page 85, on or about September 25, 1954. The 1954 deed appears to reference the Durant survey. This survey and deed only reference a combined 35 3/4 acres.

12. Despite the discrepancies in the two surveys and the deeds and the most recent survey, Plaintiffs are informed and believe that they own 54.03 acres rather than 35 3/4 acres or 35 1/3 acres.

13. Plaintiffs believe that these discrepancies are a result of more accurate surveying techniques used in 2006 than was available and used in 1918.

14. Plaintiffs are informed and believe that their predecessors in interest have used all 54.03 acres of the Property and such use was actual, open, hostile, notorious, continuous, and exclusive for a period in excess of 88 years.

15. Plaintiffs are informed and believe that they should be quieted title to the full 54.03 acres as shown on the plat attached hereto as Exhibit A.

16. Upon information and belief, the heirs of Patricia Ann Geddis own that real property which borders the Property on the North/Northwest, and is more fully identified by Dorchester County TMS No. 174-00-00-008, and upon information and belief, these individuals may have some interest in this action.

17. Although the Dorchester County Assessor's records lists the owner of that real property identified by Dorchester County TMS No. 174-00-00-008 as "Patricia Ann Geddis," Plaintiffs are informed and believe that Patricia Ann Geddis died intestate sometime in 1997, however, Plaintiffs found no probate record for the estate of Patricia Ann Geddis. The only heir of Patricia Ann Geddis of which Plaintiffs are aware is Cleveland Geddis.

18. Upon information and belief, the heirs of Rebecca Geddis own that real property which borders the Property on the South/Southeast and is more fully described by Dorchester County TMS No. 174-00-00-011, and upon information and belief these individuals may have some interest in this action.

19. Upon information and belief, Rebecca Geddis died intestate sometime before 1995, leaving as her only heirs at law, George Geddis, John Henry Geddis, and Herman Geddis. This information is derived from a condemnation action filed in the Dorchester County Court of Common Pleas at Case Number 95-CP-18-623. Interestingly, the final order in that case (filed August 26, 1997) indicates that "Rebecca Geddis" attended the final hearing. Plaintiffs have no information as to who the "Rebecca Geddis" listed in that order may be and are informed and believe that Rebecca Geddis is deceased. Despite a diligent search, however, Plaintiffs have not been able to locate any probate record for Rebecca Geddis.

20. Upon information and belief, MEADWESTVACO FORESTRY, LLC owns that real property located on the East of the Property, by virtue of a quit claim deed filed with the Dorchester County RMC's Office on June 13, 2003, at Book 3622, page 013 (derivation is found on page A-44 of this 137-page deed), said real property being identified by Dorchester County TMS No. 174-00-00-009, and this entity may have some interest in this action.

21. Dorchester County records indicate that JoeNatham Geddis owns a mobile home which is located on the real property identified as Dorchester County TMS No. 174-00-00-011, and upon information and belief, he may have some interest in this action. Plaintiffs are not aware of the specific relationship between Mr. Geddis and Rebecca Geddis or her heirs.

22. Dorchester County records indicate that Patrice Geddis owns a mobile home which is located on the real property identified as Dorchester County TMS No. 174-00-00-011, and upon information and belief, she may have some interest in this action. Plaintiffs are not aware of the specific relationship between Ms. Geddis and Rebecca Geddis or her heirs.

23. Upon information and belief the heirs of Lucius Goodwine a/k/a Lucious Goodwine and/or the heirs of Catherine Goodwine a/k/a Catharine Goodwine, one of whom may be Jessie

Goodwine, are the owners of that real property identified by Dorchester County TMS No. 174-00-00-002, which is located on the south of the Property, and upon information and belief, these individuals may have some interest in this action.

WHEREFORE Plaintiffs IRVING T. GEDDIS, JR., HARRY M. CARROLL, BARBARA C. STANCIL, AND JOANNE C. WADE pray that this Honorable Court:

1. Inquire into the matters set forth in this Complaint;
2. Determine the rights of all parties;
3. Confirm and quiet title to the Property in Plaintiffs;
4. Forever bar any claim of any person not entitled to an interest in the Property; and
5. Grant such other and further relief as this Honorable Court deems just, equitable and proper.

KNIGHT LAW FIRM, L.L.C.


JENNIFER L. QUEEN
207 East Third North Street
P.O. Box 280
Summerville, SC 29484
(843) 821-9700
jqueen@knightlawfirm.com

ATTORNEY FOR PLAINTIFFS

Summerville, South Carolina
November 8, 2007
S:\LITIGATION\Geddis.Irving\Complaint.wpd

STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2007-CP-18-_____

IRVING T. GEDDIS, JR., HARRY M. CARROLL,)
BARBARA C. STANCIL, & JOANNE C. WADE)

Plaintiff,)

v.)

REBECCA GEDDIS, PATRICIA ANN GEDDIS,)
CLEVELAND GEDDIS, JOHN HENRY GEDDIS,)
HERMAN GEDDIS, GEORGE GEDDIS, PATRICE)
GEDDIS, JOENATHAM GEDDIS, LUCIUS)
GOODWINE a/k/a LUCIOUS GOODWINE)
CATHERINE GOODWINE a/k/a CATHARINE)
GOODWINE, JESSIE GOODWINE, and any)
individual who may be claiming an interest in this)
action as an heir of these individuals, and)
MEADEWESTVACO FORESTRY LLC, and)
JOHN DOE AND JANE DOE, fictitious)
names designating the unknown heirs, devisees,)
distributees, issue, executors, administrators,)
successors or assigns of the Defendants named)
above, and RICHARD ROE AND MARY ROE,)
fictitious names designating infants and persons)
under any disability or incompetent, including)
those persons who might be in the Military Services)
within the meaning of The Soldier's and Sailor's)
Civil Relief Act of 1941, Title 50, United States)
Code, and any other person or legal entity who)
or which has or claims any right title, interest or)
lien in or to the real property described in this)
Complaint,)

Defendants.)

NOTICE OF FILING
COMPLAINT

Suit to Quiet Title

TO THE DEFENDANTS NAMED ABOVE:

YOU WILL PLEASE TAKE NOTICE THAT the original Summons and Complaint in
the above entitled action were filed in the Office of the Clerk of Court for Dorchester County.

South Carolina, the object and prayer of which is to quiet title to real property located in
Dorchester County, South Carolina and other relief as set forth in the Complaint.

KNIGHT LAW FIRM, LLC


JENNIFER L. QUEEN

207 East 3rd North Street

P. O. Box 280

Summerville, SC 29284-0280

(843) 831-9700

ATTORNEY FOR PLAINTIFF

Summerville, South Carolina

This 8 day of November, 2007.

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

) IN THE COURT OF COMMON PLEAS

) FIRST JUDICIAL CIRCUIT

) CASE NUMBER: 2007-CP-18-_____

IRVING T. GEDDIS, JR., HARRY M. CARROLL,)

BARBARA C. STANCIL, & JOANNE C. WADE,)

Plaintiffs,)

v.)

REBECCA GEDDIS, et. al.,)

Defendants.)

NOTICE OF APPOINTING
GUARDIAN AD LITEM NISI

YOU WILL PLEASE TAKE NOTICE THAT unless you apply for the appointment of a Guardian ad Litem to represent the interest of unknown heirs, devisees, distributees, issue, executors, administrators, successors, or assigns and any infant, person under disability or incompetent in the above entitled matter within thirty (30) days from the date hereof, the undersigned will make application for the appointment of such Guardian ad Litem.

KNIGHT LAW FIRM, LLC


JENNIFER L. QUEEN
207 East Third North Street
Post Office Box 280
Summerville, SC 29484
(843) 821-9700

ATTORNEY FOR PLAINTIFFS

Summerville, South Carolina
This 8 day of November, 2007

MD ✓

STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2007-CP-18-2140

IRVING T. GEDDIS, JR., HARRY M. CARROLL,
BARBARA C. STANCIL, & JOANNE C. WADE)

Plaintiff,)

v.)

REBECCA GEDDIS, PATRICIA ANN GEDDIS,
CLEVELAND GEDDIS, JOHN HENRY GEDDIS,
HERMAN GEDDIS, GEORGE GEDDIS, PATRICE
GEDDIS, JOENATHAM GEDDIS, YVONNE
GEDDIS BOWENS, GWENDOLYN P. SPELLS,
HARRY P. GEDDIS, CATHERINE
GOODWINE a/k/a CATHARINE
GOODWINE, JESSIE GOODWINE, and any
individual who may be claiming an interest in this
action as an heir of these individuals, and
MEADEWESTVACO FORESTRY LLC, and
JOHN DOE AND JANE DOE, fictitious
names designating the unknown heirs, devisees,
distributees, issue, executors, administrators,
successors or assigns of the Defendants named
above, and RICHARD ROE AND MARY ROE,
fictitious names designating infants and persons
under any disability or incompetent, including
those persons who might be in the Military Services
within the meaning of The Soldier's and Sailor's
Civil Relief Act of 1941, Title 50, United States
Code, and any other person or legal entity who
or which has or claims any right title, interest or
lien in or to the real property described in this
Complaint.)

Defendants.)

AMENDED SUMMONS

Suit to Quiet Title/Non-Jury

FILED-RECORDED
2008 DEC - 9 PM 4:36
CLERK OF COURT
DORCHESTER COUNTY

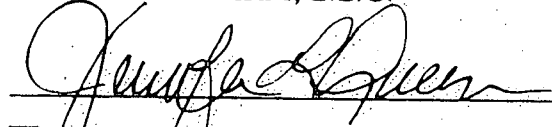
TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Amended Complaint in this
action, a copy of which is herewith served upon you, and to serve a copy of your answer on the
subscriber at her offices, 207 East 3rd North Street, Summerville, SC 29483, within thirty (30) days
after service hereof, exclusive of the day of such service, and if you fail to answer the Amended
Complaint within the time aforesaid, judgment by Default will be rendered against you for the relief

demanded in the Amended Complaint.

YOU WILL ALSO TAKE NOTICE that should you fail to answer the foregoing Summons, the Plaintiff will move for a General Order of Reference to the Honorable Master-in-Equity for Dorchester County, which Order shall, pursuant to Rule 53 (e) of the South Carolina Rules of Civil Procedure, specifically provide that said Master-in-Equity is authorized and empowered to enter a final judgment in this cause, which judgment shall be directly appealable to the South Carolina Court of Appeals or the South Carolina Supreme Court, whichever is appropriate.

KNIGHT LAW FIRM, L.L.C.



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207 East Third North Street
P.O. Box 280
Summerville, SC 29484
(843) 821-9700
jqueen@knightlawfirm.com

ATTORNEY FOR PLAINTIFFS

Summerville, South Carolina
December 4, 2007

S:\LITIGATION\Geddis Irving\Summons Amended.wpd

STATE OF SOUTH CAROLINA)
COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2007-CP-18-2140

IRVING T. GEDDIS, JR., HARRY M. CARROLL,
BARBARA C. STANCIL, & JOANNE C. WADE)

Plaintiff,)

v.)

REBECCA GEDDIS, PATRICIA ANN GEDDIS,
CLEVELAND GEDDIS, JOHN HENRY GEDDIS,
HERMAN GEDDIS, GEORGE GEDDIS, PATRICE
GEDDIS, JOENATHAM GEDDIS, YVONNE
GEDDIS BOWENS, GWENDOLYN P. SPELLS,
HARRY P. GEDDIS, CATHERINE
GOODWINE a/k/a CATHARINE
GOODWINE, JESSIE GOODWINE, and any
individual who may be claiming an interest in this
action as an heir of these individuals, and
MEADEWESTVACO FORESTRY LLC, and
JOHN DOE AND JANE DOE, fictitious
names designating the unknown heirs, devisees,
distributees, issue, executors, administrators,
successors or assigns of the Defendants named
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fictitious names designating infants and persons
under any disability or incompetent, including
those persons who might be in the Military Services
within the meaning of The Soldier's and Sailor's
Civil Relief Act of 1941, Title 50, United States
Code, and any other person or legal entity who
or which has or claims any right title, interest or
lien in or to the real property described in this
Complaint,)

Defendants.)

AMENDED COMPLAINT

Suit to Quiet Title/Non-Jury

FILED-RECORDED
2007 DEC -6 PM 4:36
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

COMES NOW Plaintiffs IRVING T. GEDDIS, JR., HARRY M. CARROLL, BARBARA
C. STANCIL, AND JOANNE C. WADE, complaining of Defendants, and would show as follows:

1. Plaintiffs bring this action pursuant to South Carolina's Uniform Declaratory
Judgments Act, Sections 15-53-10, et seq., Code of Laws of South Carolina (1976), as amended,
seeking an order from this Honorable Court declaring that they and certain others own fee simple
absolute title in and to the real property which is the subject of this suit (Property), free and clear of
all claims.

2. Plaintiffs are residents of Maryland and New York and claim an interest in the Property.

3. Upon information and belief, Defendant MEADWESTVACO FORESTRY, LLC, is a Limited Liability Company organized and existing under the laws of Delaware, and authorized to do business in South Carolina, and owns real property in Dorchester County, South Carolina.

4. Plaintiffs are informed and believe all other Defendants are or were residents of Dorchester County or outside South Carolina and/or may claim some interest in the Property.

5. The real property that is the subject of this suit is situated in Dorchester County, South Carolina and for purposes of this suit is described as follows ("the Property"):

ALL that certain, piece, lot or tract of land containing 54.03 acres, more or less, all as more fully shown on a Plat entitled "Boundary Survey of 54.03 acres owned by Irving T. Geddis & Irma Carroll Geddisville Area Dorchester County, South Carolina," by Robert J. Sample, P.E. R.L.S., September 12, 2006, said plat being recorded in Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006.

BEING the same property conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

TMS No.: 174-00-00-007

5. All matter alleged to be recorded is alleged to be recorded in the Dorchester County RMC's Office or the Dorchester County Probate Court, as appropriate. All allegations of examinations of public records are alleged to be examinations of public records in Dorchester County government departments.

6. On or about April 8, 2002, Plaintiff Irving T. Geddis and his sister, Irma Carroll, a/k/a Irma G. Carroll, instituted a declaratory judgment action in the Dorchester County Court of Common Pleas, Case No. 2002-CP-18-593, in order to quiet title in them to the real property described as follows:

ALL that certain, piece, lot or tract of land containing thirty-five and one third ($35 \frac{1}{3}$) acres, more or less, situate, lying and being in the County of Colleton and State aforesaid, situated near the Edisto River and having the following boundaries to-wit North by lands of James Perry; South by lands of Richard Geddis, East by lands of Mrs. Regina Yonahan and West by lands of Isaac Singleton.

BEING the same premises conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

7. On or about January 12, 2004, Dorchester County Master-in-Equity, the Honorable Patrick R. Watts, entered a Master's Report and Order quieting title in the real property described in paragraph 6 above to Irving T. Geddis, Jr. and Irma Carroll.

8. Irma Carroll passed away on or about May 4, 2004, and all her interest in the real property described in paragraph 6 above was transferred to her children, Harry M. Carroll, Barbara C. Stancil, and Joanne C. Wade, by Deed of Distribution filed with the Dorchester County RMC's Office at Book 5189, Page 237, on or about February 8, 2006.

9. After the January 12, 2004, Master's Report and Order quieted title to Irving and Irma, Irving had the Property surveyed. A copy of the resulting plat is attached hereto as Exhibit A. A copy was also recorded in the Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006.

10. As a result of this survey, Irving learned that the parcel of real property identified by Dorchester County TMS No. 174-00-00-007 actually contains approximately 54.03 acres, more or less, rather than $35 \frac{1}{3}$ acres as stated in the previous suit to quiet title and deeds.

11. Plaintiffs are informed and believe that the description in the 1954 deed to Irving T. Geddis, a/k/a as Irving T. Geddis, Sr., being the same legal description used in the previous suit to quiet title and allegedly only containing $35 \frac{3}{4}$ acres, arose from a 1918 plat by C.E. Durant entitled "Plat of Thirty Five and Three Fourth Acres of land situated on Block Hill South of Givhans Ferry, county and state aforesaid said land out of Richard Washington Estate for Harry Geddis, as per will."

dated September 24, 1918. Prior to ownership transferring to Irving and Irma by Deed of Distribution from estate of Irving T. Geddis, Sr., ownership of the Property transferred from the heirs of Harry Geddis into Irving T. Geddis a/k/a Irving T. Geddis, Sr., by deed filed with Dorchester County RMC's Office at Book 109, Page 85, on or about September 25, 1954. The 1954 deed appears to reference the Durant survey. This survey and deed only reference a combined 35 3/4 acres.

12. Despite the discrepancies in the two surveys and the deeds and the most recent survey, Plaintiffs are informed and believe that they own 54.03 acres rather than 35 3/4 acres or 35 1/3 acres.

13. Plaintiffs believe that these discrepancies are a result of more accurate surveying techniques used in 2006 than was available and used in 1918.

14. Plaintiffs are informed and believe that their predecessors in interest have used all 54.03 acres of the Property and such use was actual, open, hostile, notorious, continuous, and exclusive for a period in excess of 88 years.

15. Plaintiffs are informed and believe that they should be quieted title to the full 54.03 acres as shown on the plat attached hereto as Exhibit A.

16. Upon information and belief, the heirs of Patricia Ann Geddis own that real property which borders the Property on the North/Northwest, and is more fully identified by Dorchester County TMS No. 174-00-00-008, and upon information and belief, these individuals may have some interest in this action.

17. Although the Dorchester County Assessor's records lists the owner of that real property identified by Dorchester County TMS No. 174-00-00-008 as "Patricia Ann Geddis," Plaintiffs are informed and believe that Patricia Ann Geddis died intestate sometime in 1997. Upon information and belief, the estate of Patricia Ann Geddis was probated with the Dorchester County Probate Court at file number 1998-ES-18-00072. She left as her heirs her husband, Cleveland Geddis and her daughter, Patrice O. Geddis. The estate of Ms. Geddis was stricken from the roster with leave to restore for failure to comply with statutory requirements. Plaintiffs found no deed of

distribution regarding the real property described above in this paragraph.

18. Upon information and belief, the heirs of Rebecca Geddis own that real property which borders the Property on the South/Southeast and is more fully described by Dorchester County TMS No. 174-00-00-011, and upon information and belief these individuals may have some interest in this action.

19. Upon information and belief, Rebecca Geddis died intestate sometime before 1995, leaving as her only heirs at law, George Geddis, John Henry Geddis, and Herman Geddis. This information is derived from a condemnation action filed in the Dorchester County Court of Common Pleas at Case Number 95-CP-18-623. Interestingly, the final order in that case (filed August 26, 1997) indicates that "Rebecca Geddis" attended the final hearing. Plaintiffs have no information as to who the "Rebecca Geddis" listed in that order may be and are informed and believe that Rebecca Geddis is deceased. Despite a diligent search, however, Plaintiffs have not been able to locate any probate record for Rebecca Geddis.

20. Upon information and belief, George Geddis died intestate on or about October 24, 1996, and left as his heirs at law Yvonne Geddis Bowens, Gwendolyn P. Spells, and Harry P. Geddis. His estate was probated with Dorchester County Probate Court at file number 99-ES-18-00450. Plaintiffs found no deed of distribution with regard to George Geddis' interest in this real property described in paragraph 19 above.

21. Upon information and belief, MEADWESTVACO FORESTRY, LLC owns that real property located on the East of the Property, by virtue of a quit claim deed filed with the Dorchester County RMC's Office on June 13, 2003, at Book 3622, page 013 (derivation is found on page A-44 of this 137-page deed), said real property being identified by Dorchester County TMS No. 174-00-00-009, and this entity may have some interest in this action.

22. Dorchester County records indicate that JoeNatham Geddis owns a mobile home which is located on the real property identified as Dorchester County TMS No. 174-00-00-011, and upon information and belief, he may have some interest in this action. Plaintiffs are not aware of the specific relationship between Mr. Geddis and Rebecca Geddis or her heirs.

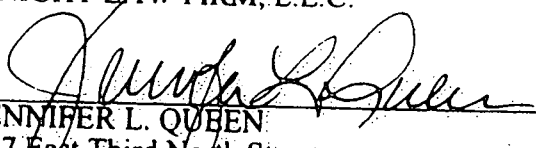
23. Dorchester County records indicate that Patrice Geddis owns a mobile home which is located on the real property identified as Dorchester County TMS No. 174-00-00-011, and upon information and belief, she may have some interest in this action, and she is the daughter of Patricia Ann Geddis.

24. Upon information and belief the heirs of the heirs of Catherine Goodwine a/k/a Catharine Goodwine, one of whom may be Jessie Goodwine, are the owners of that real property identified by Dorchester County TMS No. 174-00-00-002, which is located on the south of the Property, and upon information and belief, these individuals may have some interest in this action. Ms. Goodwine received title to this real property from her son, Lucius Goodwine, by deed filed with the Dorchester County RMC's office at Book 97, Page 111, on or about November 22, 1949.

WHEREFORE Plaintiffs IRVING T. GEDDIS, JR., HARRY M. CARROLL, BARBARA C. STANCIL, AND JOANNE C. WADE pray that this Honorable Court:

1. Inquire into the matters set forth in this Complaint;
2. Determine the rights of all parties;
3. Confirm and quiet title to the Property in Plaintiffs;
4. Forever bar any claim of any person not entitled to an interest in the Property; and
5. Grant such other and further relief as this Honorable Court deems just, equitable and proper.

KNIGHT LAW FIRM, L.L.C.


JENNIFER L. QUEEN
207 East Third North Street
P.O. Box 280
Summerville, SC 29484
(843) 821-9700
jqueen@knightlawfirm.com

ATTORNEY FOR PLAINTIFFS

Summerville, South Carolina

December 4, 2007

S:\LITIGATION\Geddis.Irving\Complaint.Amended.wpd

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
) FIRST JUDICIAL CIRCUIT
COUNTY OF DORCHESTER) CASE NUMBER: 2007-CP-18-2140
)

IRVING T. GEDDIS, JR., HARRY M. CAROLL,)
BARBARA C. STANCIL & JOANNE C. WADE)

Plaintiff,)

v.)

REBECCA GEDDIS, PATRICIA ANN GEDDIS,)
CLEVELAND GEDDIS, JOHN HENRY GEDDIS,)
HERMAN GEDDIS, GEORGE GEDDIS,)
PATRICE GEDDIS, JOENATHAM GEDDIS,)
YVONNE GEDDIS BOWENS, GWENDOLYN P.)
SPELLS, HARRY P. GEDDIS, CATHERINE)
GOODWINE a/k/a CATHARINE GOODWINE,)
JESSIE GOODWINE, and any individual who may)
be claiming an interest in this action as an heir of)
these individuals, and MEADEWESTVACO)
FORESTRY, LLC, and JOHN DOE AND JANE)
DOE, fictitious names designating the unknown)
Heirs, devisees, distributees, issue, executors,)
Administrators, successors or assigns of the)
Defendants named above, and RICHARD ROE)
AND MARY ROE, fictitious names designating)
infants and persons under any disability or)
incompetent, including those persons who might)
be in the Military Services within the meaning of)
The Soldier's and Sailor's Civil Relief Act of 1941,)
Title 50, United States Code, and any other person)
or legal entity who or which has or claims any)
right title, interest or lien in or to the real property)
described in this Complaint,)

Defendants.)

ANSWER

FILED-RECORDED
2009 MAY -6 AM 10:49
CLERK OF COURT
DORCHESTER COUNTY

NOW comes Defendant, Patrice Geddis Simmons f/k/a Patrice Geddis, in the above-captioned matter and would respectfully show unto this Honorable Court the following:

1. Pursuant to Rule 12(b)(6) of the South Carolina Rules of Civil Procedure, Defendant, Patrice Geddis Simmons f/k/a Patrice Geddis, moves to dismiss Plaintiff's action on grounds of failure to state facts sufficient to constitute a cause of action.
2. That Defendant, Patrice Geddis Simmons f/k/a Patrice Geddis, denies each and every allegation of the Complaint not specifically admitted to, qualified, or explained, and demands strict proof thereof.

WHEREFORE, Defendant, Patrice Geddis Simmons f/k/a Patrice Geddis, respectfully requests that this Honorable Court dismiss the Plaintiff's action on grounds of failure to state facts sufficient to constitute a cause of action.



Patrice Geddis Simmons f/k/a Patrice Geddis
299 Geddisville Road
Adams Run, SC 29426

Dorchester, South Carolina

May 4, 2009

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

Irving T. Geddis, Jr., Harry M. Carroll,
Barbara C. Stancil and Joanne C.
Wade,

Plaintiffs,

vs.

Rebecca Geddis, Patricia Ann Geddis,
Cleveland Geddis, John Henry Geddis,
Herman Geddis, George Geddis,
Patrice Geddis, Joenatham Geddis,
Yvonne Geddis Bowens, Gwendolyn P.
Spells, Harry P. Geddis, Catherine
Goodwine a/k/a Catharine Goodwine,
Jessie Goodwine and any individual
who may be claiming an interest in this
action as an heir of these individuals,
MeadeWestvaco Forestry, LLC, and
John Doe and Jane Doe, fictitious
names designating the unknown heirs,
devisees, distributees, issue, executors,
administrators, successors or assigns
of the Defendants named above, and
Richard Roe and Mary Roe, fictitious
names designating infants and persons
under any disability or incompetent,
including those persons who might be
in the Military Services within the
meaning of The Soldier's and Sailor's
Civil Relief Act of 1941, Title 50,
United States Code, and any other
person or legal entity who or which has
or claims any right title, interest or lien
in or to the real property described in
this Complaint,

Defendants.

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2007-CP-18-2140

ANSWER

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2007 DEC 14 PM 1:49
CLERK OF COURT
JUDICIAL CIRCUIT
DISTRICT OF COLUMBIA

The Defendant, MeadWestvaco Forestry, LLC (erroneously designated as MeadeWestvaco Forestry, LLC), answering the complaint of the Plaintiffs, alleges and says:

1. It denies each and every allegation of said complaint not specifically admitted.
2. It admits, on information and belief, the allegations of paragraphs 1 and 2.
3. Answering the allegations of paragraph 3, this Defendant avers that MeadWestvaco Forestry, LLC was a limited liability company originated and existing under the laws of the State of Delaware, and authorized to do business in South Carolina, and owned real property in Dorchester County, South Carolina. However, MeadWestvaco Forestry, LLC conveyed the properties held by it to MWV Community Development and Land Management, LLC (hereinafter "MWV CDLM"), another limited liability company originated and existing under the laws of the State of Delaware and it is the proper defendant in these proceedings.
4. This Defendant does not have sufficient information to form a belief as to the allegations of paragraph 4 and neither admits nor denies the same.
5. It admits, on information and belief, the allegations of paragraph 5, but avers that it is the owner of property situated to the northeast of the property described in paragraph 5 and this Defendant avers that the property line shown on the plat attached to this answer is the proper property line between the parties.
6. This Defendant does not have sufficient information to form a belief as to the allegation of the second paragraph 5 and neither admits nor denies the same.

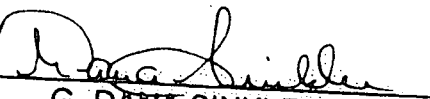
7. This Defendant does not have sufficient information to form a belief as to the allegations of paragraphs 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20 and therefore denies the same and demands strict proof thereof.

8. Answering the allegations of paragraph 21, this Defendant avers that the property is now owned by MWV CDLM and that company should be substituted for the defendant named in these proceedings. It further admits that it is the property located to the northeast of the property claimed by the Plaintiffs and that said real property is identified by Dorchester County TMS No. 174-00-00-009. MWV CDLM does have an interest in establishing the correct boundary line between the parties.

9. This Defendant does not have sufficient information to form a belief as to the allegations of paragraphs 22, 23 and 24 and therefore denies the same.

Wherefore, this Defendant prays that the Court inquire into the evidence establishing the correct boundary between the properties of the Plaintiff and MWV CDLM and adopt such boundary as the correct boundary line between the parties.

WARREN & SINKLER, L.L.P.
Post Office Box 1254
Charleston, SC 29402
(843) 577-0660

By 
G. DANA SINKLER

Attorney for Defendant

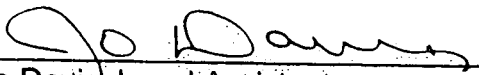
Charleston, South Carolina

December 13, 2010

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of December, 2010, I served the foregoing Answer on all counsel of record by mailing a copy of the same, postage prepaid, addressed as follows:

Kathryn A. Martin, Esquire
Knight Law Firm, LLC
Post Office Box 280
Summerville, SC 29484-0280


Jo Davis, Legal Assistant

FILED - RECORD
2010 DEC 14 PM 1:49
CHERIE
CLEER
DORCHES

STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

IRVING T. GEDDIS, JR., HARRY M.)
CARROLL, BARBARA C. STANCIL and)
JOANNE C. WADE,)

Plaintiffs,)

vs.)

REBECCA GEDDIS, ET AL)

Defendants.)

IN THE COURT OF COMMON PLEAS
FOR THE FIRST JUDICIAL CIRCUIT
CASE NO: 2007-CP-18-2140

TRANSCRIPT OF TESTIMONY
SUIT TO QUIET TITLE

2010 SEP 29 PM 12:55
CLERK OF COURT
DORCHESTER COUNTY

COMES NOW Plaintiffs Irving Geddis, Jr. Harry M. Carroll, Barbara C. Stancil and Joanne C. Wade and makes the following testimony regarding this case:

1. Plaintiffs bring this action pursuant to South Carolina's Uniform Declaratory Judgments Act, Sections 15-53-10, et seq., Code of Laws of South Carolina (1976), as amended, seeking an order from this Honorable Court declaring that they and certain others own fee simple absolute title in and to the real property which is the subject of this suit (Property), free and clear of all claims.

2. The real property that is the subject of this suit is situated in Dorchester County, South Carolina and for purposes of this suit is described as follows ("the Property"):

ALL that certain, piece, lot or tract of land containing 54.03 acres, more or less, all as more fully shown on a Plat entitled "Boundary Survey of 54.03 acres owned by Irving T. Geddis & Irma Carroll Geddisville Area Dorchester County, South Carolina," by Robert J. Sample, P.E. R.L.S., September 12, 2006, said plat being recorded in Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006.

BEING the same property conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry

Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

TMS No.: 174-00-00-007

3. On or about April 8, 2002, Plaintiff Irving T. Geddis and his sister, Irma Carroll, a/k/a Irma G. Carroll, instituted a declaratory judgment action in the Dorchester County Court of Common Pleas, Case No. 2002-CP-18-593, in order to quiet title in them to the real property described as follows:

ALL that certain, piece, lot or tract of land containing thirty-five and one third (35 1/3) acres, more or less, situate, lying and being in the County of Colleton and State aforesaid, situated near the Edisto River and having the following boundaries to-wit North by lands of James Perry; South by lands of Richard Geddis, East by lands of Mrs. Regina Yonahan and West by lands of Isaac Singleton.

BEING the same premises conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

4. On or about January 12, 2004, Dorchester County Master-in-Equity, the Honorable Patrick R. Watts, entered a Master's Report and Order quieting title in the real property described in paragraph 6 above to Irving T. Geddis, Jr. and Irma Carroll.

5. Irma Carroll passed away on or about May 4, 2004, and all her interest in the real property described in paragraph 6 above was transferred to her children, Harry M. Carroll, Barbara C. Stancil, and Joanne C. Wade, by Deed of Distribution filed with the Dorchester County RMC's Office at Book 5189, Page 237, on or about February 8, 2006.

6. After the January 12, 2004, Master's Report and Order quieted title to Irving T. Geddis, Jr. and Irma Carroll, Irving T. Geddis, Jr. had the Property surveyed. A copy was also

recorded in the Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006. A copy of the resulting plat is attached hereto as Exhibit A.

7. As a result of this survey, Irving learned that the parcel of real property identified by Dorchester County TMS No. 174-00-00-007 actually contains approximately 54.03 acres, more or less, rather than 35 1/3 acres as stated in the previous suit to quiet title and deeds.

8. Plaintiffs are informed and believe that the description in the 1954 deed to Irving T. Geddis, a/k/a as Irving T. Geddis, Sr., being the same legal description used in the previous suit to quiet title and allegedly only containing 35 3/4 acres, arose from a plat by C.E. Durant entitled "Plat of Thirty Five and Three Fourth Acres of land situated on Block Hill South of Givhans Ferry, county and state aforesaid said land out of Richard Washington Estate for Harry Geddis, as per will." dated September 24, 1918. Prior to ownership transferring to Irving and Irma by Deed of Distribution from estate of Irving T. Geddis, Sr., ownership of the Property transferred from the heirs of Harry Geddis into Irving T. Geddis a/k/a Irving T. Geddis, Sr., by deed filed with Dorchester County RMC's Office at Book 109, Page 85, on or about September 25, 1954. The 1954 deed appears to reference the Durant survey. This survey and deed only reference a combined 35 3/4 acres.

9. Despite the discrepancies in the two surveys and the deeds and the most recent survey, Plaintiffs are informed and believe that they own 54.03 acres rather than 35 3/4 acres or 35 1/3 acres.

10. Plaintiffs believe that these discrepancies are a result of more accurate surveying techniques used in 2006 than were available and used in 1918.

11. Plaintiffs are informed and believe that their predecessors in interest have used all 54.03 acres of the Property and such use was actual, open, hostile, notorious, continuous, and exclusive for a period in excess of 88 years.

12. Plaintiffs are informed and believe that they should be quieted title to the full 54.03 acres as shown on the plat attached hereto as Exhibit A.

13. Upon information and belief, the heirs of Patricia Ann Geddis own that real property which borders the Property on the North/Northwest, and is more fully identified by Dorchester County TMS No. 174-00-00-008, and upon information and belief, these individuals may have some interest in this action.

14. Although the Dorchester County Assessor's records lists the owner of that real property identified by Dorchester County TMS No. 174-00-00-008 as "Patricia Ann Geddis," Plaintiffs are informed and believe that Patricia Ann Geddis died intestate sometime in 1997. Upon information and belief, the estate of Patricia Ann Geddis was probated with the Dorchester County Probate Court at file number 1998-ES-18-00072. She left as her heirs her husband, Cleveland Geddis and her daughter, Patrice O. Geddis. The estate of Ms. Geddis was stricken from the roster with leave to restore for failure to comply with statutory requirements. Plaintiffs found no deed of distribution regarding the real property described above in this paragraph.

15. Upon information and belief, the heirs of Rebecca Geddis own that real property which borders the Property on the South/Southeast and is more fully described by Dorchester County TMS No. 174-00-00-011, and upon information and belief these individuals may have some interest in this action.

16. Upon information and belief, Rebecca Geddis died intestate sometime before 1995, leaving as her only heirs at law, George Geddis, John Henry Geddis, and Herman Geddis. This information is derived from a condemnation action filed in the Dorchester County Court of Common Pleas at Case Number 95-CP-18-623. Interestingly, the final order in that case (filed August 26, 1997) indicates that "Rebecca Geddis" attended the final hearing. Plaintiffs have no information as to who the "Rebecca Geddis" listed in that order may be and are informed and believe that Rebecca Geddis is deceased. Despite a diligent search, however, Plaintiffs have not been able to locate any probate record for Rebecca Geddis.

17. Upon information and belief, George Geddis died intestate on or about October 24,

1996, and left as his heirs at law Yvonne Geddis Bowens, Gwendolyn P. Spells, and Harry P. Geddis. His estate was probated with Dorchester County Probate Court at file number 99-ES-18-00450. Plaintiffs found no deed of distribution with regard to George Geddis' interest in this real property described in paragraph 15 above.

18. Upon information and belief, MEADWESTVACO FORESTRY, LLC owns that real property located on the East of the Property, by virtue of a quit claim deed filed with the Dorchester County RMC's Office on June 13, 2003, at Book 3622, page 013 (derivation is found on page A-44 of this 137-page deed); said real property being identified by Dorchester County TMS No. 174-00-00-009, and this entity may have some interest in this action.

19. Dorchester County records indicate that JoeNatham Geddis owns a mobile home which is located on the real property identified as Dorchester County TMS No. 174-00-00-011, and upon information and belief, he may have some interest in this action. Plaintiffs are not aware of the specific relationship between Mr. Geddis and Rebecca Geddis or her heirs.

20. Dorchester County records indicate that Patrice Geddis owns a mobile home which is located on the real property identified as Dorchester County TMS No. 174-00-00-011, and upon information and belief, she may have some interest in this action, and she is the daughter of Patricia Ann Geddis.

21. Upon information and belief the heirs of the heirs of Catherine Goodwine a/k/a Catharine Goodwine, one of whom may be Jessie Goodwine, are the owners of that real property identified by Dorchester County TMS No. 174-00-00-002, which is located on the south of the Property, and upon information and belief, these individuals may have some interest in this action. Ms. Goodwine received title to this real property from her son, Lucius Goodwine, by deed filed with the Dorchester County RMC's office at Book 97, Page 111, on or about November 22, 1949.

22. By virtue of the deeds as more fully described above, any interests or right claimed by Defendants or their assigns should be extinguished.

Harry M. Carroll

Harry M. Carroll

Barbara C. Sencil

Barbara C. Sencil

Joanne C. Wade

Joanne C. Wade

State of MD)

County of Baltimore)

Harry M. Carroll and Joanne C. Wade

Sworn to before me this
22nd day of September, 2010.

Matthew K. Roberts

Notary Public For South Carolina

My commission expires: May 3, 2014

MATTHEW K. ROBERTS
NOTARY PUBLIC
BALTIMORE COUNTY
MARYLAND
MY COMMISSION EXPIRES MAY 3, 2014

Notary for Barbara Sencil

September 22, 2010.

JAMES N LIVERPOOL
NOTARY PUBLIC
BALTIMORE COUNTY
MARYLAND
MY COMMISSION EXPIRES JULY 29, 2012

J. N. Liverpool

STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2007-CP-18-2140

IRVING T. GEDDIS, JR., HARRY M. CARROLL,
BARBARA C. STANCIL, & JOANNE C. WADE)

Plaintiffs,)

v.)

REBECCA GEDDIS, PATRICIA ANN GEDDIS,
CLEVELAND GEDDIS, JOHN HENRY GEDDIS,
HERMAN GEDDIS, GEORGE GEDDIS, PATRICE
GEDDIS, JOENATHAM GEDDIS, YVONNE
GEDDIS BOWENS, GWENDOLYN P. SPELL,
HARRY P. GEDDIS, CATHERINE
GOODWINE a/k/a CATHARINE
GOODWINE, JESSIE GOODWINE, and any
individual who may be claiming an interest in this
action as an heir of these individuals, and
MWV COMMUNITY DEVELOPMENT AND LAND
MANAGEMENT, LLC, and JOHN DOE and JANE
DOE, fictitious names designating the unknown heirs,
devisees, distributees, issue, executors,
administrators, successors or assigns of the
Defendants named above, and RICHARD ROE and
MARY ROE, fictitious names designating infants and
persons under any disability or incompetent, including
those persons who might be in the Military Services
within the meaning of The Soldier's and Sailor's
Civil Relief Act of 1941, Title 50, United States
Code, and any other person or legal entity who
or which has or claims any right title, interest or
lien in or to the real property described in this
Complaint,)

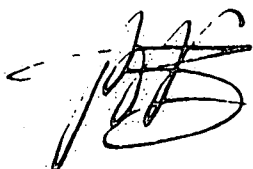
Defendants.)

**SPECIAL REFEREE'S
REPORT AND
FINAL ORDER**

2011 AUG 9:57

Pursuant to the Order of Reference to Special Referee filed herein on August 1, 2011,
this action came before me to quiet title.

Pursuant to the Order of Reference to Special Referee, a hearing was held on
November 17, 2011, and was attended by William E. McIntosh, Esquire, counsel for Plaintiffs,



1/10

G. Dana Sinkler, Esquire, counsel for Defendant MWV Community Development and Land Management, LLC (hereinafter "MWV CDLM"), and Guardian ad Litem Christopher J. Murphy, Esquire. Defendant Patrice Geddis, the only remaining defendant not in default, appeared *pro se* along with the following parties in default and interested non-parties: Cleveland Geddis, Yvonne Geddis Bowens, Gwendolyn P. Spell, Monica Geddis Farmer, Lutherine Geddis, Tyrone Jerome Geddis, James Morris, and Teddy Goodwine. From the testimony, record and evidence, I find, conclude and order as follows:

PROCEDURAL HISTORY

1. That on November 14, 2007, Plaintiffs initiated this suit to quiet title against Defendants by filing the Summons, Complaint, and Lis Pendens with the Dorchester County Clerk of Court. An Amended Summons and Amended Complaint were filed on December 6, 2007.
2. Defendant Patrice Geddis was served with the amended pleadings on April 8, 2009, as indicated by the Proof of Service filed herein. Patrice Geddis filed a *pro se* Answer on or about May 6, 2009.
3. A Petition and Order for Appointment of Guardian Ad Litem Nisi and Order for Publication was filed with the Court on May 19, 2009.
4. Defendant Cleveland Geddis was served with the amended pleadings on October 14, 2010, as indicated by the Affidavit of Service filed herein.
5. Defendant Gwendolyn P. Spell was served with the amended pleadings on October 16, 2010, as indicated by the Proof of Service filed herein.
6. Defendant MWV CDLM was served with the amended pleadings on October 22, 2010, as indicated by the Proof of Service filed herein. MWV CDLM filed its Answer on or about December 16, 2010.



2/10

7. Defendant John Henry Geddis was served with the amended pleadings on November 3, 2010, as indicated by the Affidavit of Service filed herein.

8. Defendant George Geddis was served with the amended pleadings on November 13, 2010, as indicated by the Proof of Service filed herein.

9. Defendant Yvonne Geddis Bowens was served with the amended pleadings on November 17, 2010, as indicated by the Proof of Service filed herein.

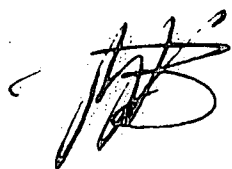
10. Defendant Herman Geddis was served with the amended pleadings on November 19, 2010, as indicated by the Proof of Service filed herein.

11. Defendant Harry P. Geddis was served with the amended pleadings on December 2, 2010, as shown by the Proof of Service filed herein.

12. The remaining named defendants – Rebecca Geddis, Patricia Ann Geddis, Joenatham Geddis, Catherine Goodwine a/k/a Catharine Goodwine, and Jessie Goodwine - were served through publication as indicated in the Affidavit of Publication filed April 11, 2011.

13. Some of the defendants are unknown, and Plaintiffs petitioned the Court to serve these unknown individuals by publication. Plaintiffs submitted a Petition for Appointment of Guardian ad Litem Nisi and Order for Publication, on or about May 19, 2009. And upon receipt and review of this Petition, the Clerk of Court for Dorchester County, issued an Order of Publication. Publication was made in *The Summerville Journal-Scene* on March 4, 2011, March 11, 2011, and March 18, 2011, as indicated by the Affidavit of Publication filed in the record of this case on or about April 8, 2011.

14. Christopher J. Murphy, Esquire, was appointed Guardian ad Litem Absolute, and filed an Answer on behalf of the unknown Defendants on or about September 23, 2009, however, other than Patrice Geddis and MWV CDLM, none of the other Defendants filed an



3/10

Answer or other document responsive to the pleading as directed by South Carolina Rules of Civil Procedure.

15. A Notice of Motion and Motion for Judgment by Default was filed on July 7, 2011, and an Order of Default was filed in the Office of the Clerk of Court for Dorchester County on August 1, 2011, ordering that Defendants Rebecca Geddis, Patricia Ann Geddis, Cleveland Geddis, John Henry Geddis, Herman Geddis, George Geddis, Joenatham Geddis, Yvonne Geddis Bowens, Gwendolyn P. Spell, Harry P. Geddis, Catherine Goodwine a/k/a Gatharine Goodwine, and Jessie Goodwine are declared to be in default.

16. On August 1, 2011, the court issued its order referring this action to the special referee for the determination of all outstanding issues.

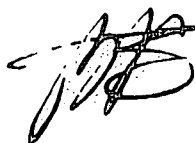
17. A hearing was held on November 17, 2011 after proper notice was given to all defendants.

FINDINGS OF FACT

1. Plaintiffs bring this action pursuant to South Carolina's Uniform Declaratory Judgments Act, Sections 15-53-10, et seq., Code of Laws of South Carolina (1976), as amended, seeking an order from this Honorable Court declaring that they and certain others own fee simple absolute title in and to the real property which is the subject of this suit (the Property), free and clear of all claims.

2. The real property that is the subject of this suit is situated in Dorchester County, South Carolina, and for purposes of this suit is described as follows:

All that certain, piece, lot or tract of land containing 54.03 acres, more or less, all as more fully shown on a Plat entitled "Boundary Survey of 54.03 acres owned by Irving T. Geddis & Irma Carroll Geddisville Area Dorchester County, South Carolina," by Robert J. Sample, P.E. R.L.S., September 12, 2006, said plat being recorded in Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006.



4/0

Being the same property conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

TMS No.: 174-00-00-007

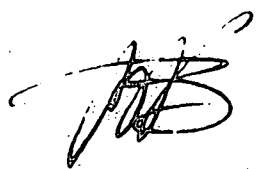
3. On or about April 8, 2002, Plaintiff Irving T. Geddis and his sister, Irma Carroll, a/k/a Irma G. Carroll, instituted a declaratory judgment action in the Dorchester County Court of Common Pleas, Case No. 2002-CP-18-593, in order to quiet title in them to the real property described as follows:

All that certain, piece, lot or tract of land containing thirty-five and one third (35 1/3) acres, more or less, situate, lying and being in the County of Colleton and State aforesaid, situated near the Edisto River and having the following boundaries to-wit North by lands of James Perry; South by lands of Richard Geddis, East by lands of Mrs. Regina Yonahan and West by lands of Isaac Singleton.

Being the same premises conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Ornisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 73.

4. On or about January 12, 2004, the Dorchester County Master in Equity entered a Master's Report and Order quieting title in the real property described in paragraph 3 above to Irving T. Geddis and Irma Carroll. A copy of the filed Master's Report and Order is attached hereto as Exhibit A.

5. Irma Carroll passed away on or about May 4, 2004, and all her interest in the real property described in paragraph 3 above was transferred to her children, Harry M. Carroll,



5/10

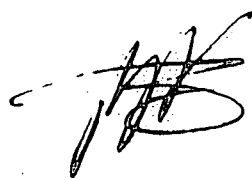
Barbara C. Stancil, and Joanne C. Wade, by Deed of Distribution filed with the Dorchester County Register of Deeds Office in Book 5189 at Page 237, on or about February 8, 2006. A copy of the filed Deed of Distribution is attached hereto as Exhibit B.

6. After the January 12, 2004, Master's Report and Order quieted title to Irving Geddis and Irma Geddis, the owners had the Property surveyed. A plat was recorded in the Dorchester County RMC's Office at Plat Cabinet L, Slide 32, on or about October 11, 2006. A filed copy of the resulting plat is attached hereto as Exhibit C.

7. As a result of the survey attached hereto as Exhibit C, it was discovered that the parcel of real property identified by Dorchester County TMS No. 174-00-00-007 contains 54 acres rather than 35 1/3 acres as stated in the previous suit to quiet title and deeds.

8. In their Complaint, Plaintiffs alleged that the Property may be delineated by the plat by C.E. Durant entitled "Plat of Thirty Five and Three Fourth Acres of land situated on Block Hill South of Givhans Ferry, county and state aforesaid said land out of Richard Washington Estate for Harry Geddis, as per will," dated September 24, 1918. However, further reflection of the public records, including the Master's Report and Order for Case Number 2002-CP-18-593, attached hereto as Exhibit A, revealed that the Durant plat is of entirely different property located well north of the subject Property. Those parcels are identifiable by tax map numbers 139-00-00-008 and 140-00-00-036. The property in the Durant plat transferred from the heirs of Harry Geddis into Irving T. Geddis a/k/a Irving T. Geddis, Sr., by deed filed with Dorchester County RMC's Office at Book 109, Page 85, on or about September 25, 1954. A copy of the Durant plat is attached hereto as Exhibit D.

9. The discrepancy between 35 1/3 acres and 54 acres may be attributable to no survey of the subject Property contemporaneous with the conveyances in the first half of the twentieth century, and none until 2006.

 6/10

10. Despite the discrepancy, Plaintiffs own 54 acres, more or less, rather than 35 1/3 acres, based upon long recognized lines of occupation.

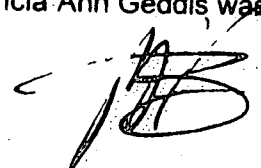
11. Plaintiffs and Defendant MWV CDLM, have entered into a boundary line agreement changing slightly their mutual boundary line. These parties have agreed that a new boundary line plat which was recorded in the Dorchester County RMC's Office at Plat Cabinet L, Slide 177, on January 10, 2012, to supercede Exhibit C. A filed copy of the resulting plat is attached hereto as Exhibit E setting forth the agreed-upon boundary line and indicating that the Property contains 53.8 acres.

12. Plaintiffs and their predecessors in interest have used all 53.8 acres of the Property and such use was actual, open, hostile, notorious, continuous, and exclusive for a period in excess of 88 years. In case number 2002-CP-18-593, the Master found they had grown and harvested timber. ← but where?

13. By virtue of that occupation and possession under color of title, Plaintiffs have fee simple absolute title to the Property free and clear of all claims, pursuant to Section 15-67-220, Code of Laws of South Carolina (1976), as amended.

14. The heirs of Patricia Ann Geddis own that real property which borders the Property on the North/Northwest, and is more fully identified by Dorchester County TMS No. 174-00-00-008.

15. Although the Dorchester County Assessor's records lists the owner of that real property identified by Dorchester County TMS No. 174-00-00-008 as 'Patricia Ann Geddis,' Patricia Ann Geddis died intestate on or about December 22, 1997. The estate of Patricia Ann Geddis was probated with the Dorchester County Probate Court at file number 1998-ES-18-00072. She left as her heirs her husband, Cleveland Geddis and her daughter, Patrice Geddis. The estate of Patricia Ann Geddis was stricken from the roster with leave to restore for failure to

 7/10

comply with statutory requirements. No deed of distribution can be located regarding the real property described above in this paragraph.

16. MWV CDLM, formerly known as Meadwestvaco Forestry, LLC, owns that real property located on the East of the Property, by virtue of a quit claim deed filed with the Dorchester County RMC's Office on June 13, 2003, at Book 3622, page 013 (derivation is found on page A-44 of this 137-page deed), said real property being identified by Dorchester County TMS No. 174-00-00-009. Plaintiffs and MWC CDLM have entered into a boundary line agreement changing slightly the mutual boundary as set forth hereinabove and in Exhibit E.

17. The heirs of Catherine Goodwine a/k/a Catharine Goodwine, one of whom it appears is Jessie Goodwine, are the owners of that real property identified by Dorchester County TMS No. 174-00-00-002, which is located on the south of the Property. Ms. Goodwine received title to this real property from her son, Lucius Goodwine, by deed filed with the Dorchester County RMC's office at Book 97, Page 111, on or about November 22, 1949.

18. The heirs of Rebecca Geddis own that parcel of real property more fully described as Dorchester County TMS No. 174-00-00-011. In their Complaint, Plaintiffs allege upon information and belief that this parcel borders the Property on the south / southeast. A review of the public records of Dorchester County establishes that this parcel does not border the Property.

19. Pursuant to the Deed attached hereto as Exhibit B, none of the other or bordering property owners, as shown in Paragraphs 13 through 17 above, inclusive, have an interest in the Property.

CONCLUSIONS OF LAW

1. By virtue of that occupation and possession under color of title, Plaintiffs have fee simple absolute title to the Property free and clear of all claims, pursuant to Section 15-67-220, Code of Laws of South Carolina (1976), as amended.

clear +
evidence

 8/10

2. That Plaintiffs are the sole holder of the fee simple title to the property named above and are seized and possessed of said premises free of and wholly discharged from any and every such claim or lien.

3. Any claim by Defendants of title to, claim or demand against, or lien or encumbrance upon the said land, are unjust and all such claims which Defendants may have had upon the premises above described are wholly and effectually extinguished, cut off and barred from any claim thereto and any cloud upon the title to the said premises are removed therefrom.

WHEREFORE, it is ORDERED, ADJUDGED, and DECREED that

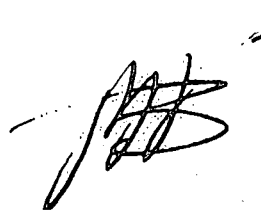
1. The boundary of the Property, hereinafter ordered adjudged and decreed to be the property of the Plaintiffs, shall be the boundary shown on the Plat by Robert J. Sample dated August 30, 2011 Revised October 1, 2011 entitled "Plat Showing the Tract 1 (53.80) Acres), Property of Irving T. Geddes, Jr., Barbara Stancil, Joanne Wade, & Harry M Carroll Located in Geddisville Area, Dorchester County, South Carolina, which Plat was recorded in the Office of the Recorder of Deeds for Dorchester County in File Cabinet L, Slide Number 177, on January 10, 2012, and is attached hereto as Exhibit E;

2. Fee simple title to the Property is quieted and confirmed to be vested in Plaintiffs Irving T. Geddis, Jr. Harry M. Carroll, Barbara C. Stancil and Joanne C. Wade;

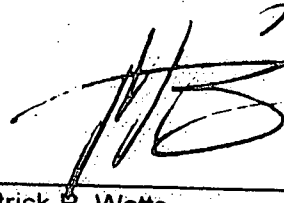
3. The claim of any other person to any right, title, interest, claim or estate in or to the Property is forever extinguished and barred;

4. The Guardian ad Litem shall be paid a fee of \$200.00; and

5. Defendants Patrice Geddis and Cleveland Geddis have thirty days in which to file any motion for reconsideration of this Order. That thirty day period begins on the day Ms. Geddis is served pursuant to Rule 5(b)(1), SCRCP, with a copy of this Order as filed with the Clerk of Court.

 9/10

AND IT IS SO ORDERED.



Patrick R. Watts,
Special Referee for Dorchester County

Summerville, South Carolina

This 18th day of January, 2012.

2007-CP-18-2140
Special Referee's
Report And
Final Order

Exhibit A

**Master's Report and Order
Irving T. Geddis, Jr. v. Harry Geddis, et al.
2002-CP-18-593**

A handwritten signature in black ink, appearing to be "H. Geddis", located at the bottom left of the page.

STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL CIRCUIT
CASE NUMBER: 2002-CP-18-593

IRVING T. GEDDIS, JR. and IRMA CARROLL)

Plaintiffs,)

v.)

MASTER'S REPORT AND ORDER

HARRY GEDDIS, ADAM E. GEDDIS,)
MAGGIE L. THOMPSON, GEORGE E. GEDDIS,)
ERMA GEDDIS, ALBERT E. GEDDIS,)
LILLA GEDDIS, HARRY GLENN, THELMA)
GLENN, ROBERT W. GEDDIS, CONSTANCE)
GEDDIS, KATIE GEDDIS, ANGIE S. MINFEE,)
JAMES MINFEE, ORNISHA A GEDDIS,)
JOSHUA GEDDIS, JOSEPH GEDDIS,)
IRVING T. GEDDIS, SR., and JOHN DOE AND)
JANE DOE, fictitious names Designating the)
unknown heirs, devisees, distributees, issue,)
executors, administrators, successors or assigns of)
the Defendants named above, & RICHARD ROE)
AND MARY ROE, fictitious names designating)
infants and persons under any disability or)
incompetent, including those persons who might be)
in the Military Services within the meaning of)
The Soldier's and Sailor's Civil Relief Act of 1941,)
Title 50, United States Code, and any other person or)
legal entity who or which has or claims any right title,)
interest or lien in or to the real property described)
in this Complaint,)

Defendants.)

Pursuant to an Order of Reference executed by the Honorable Cheryl Graham this action came
before me to quiet title.

Pursuant to the Order of Reference, a hearing was held on October 22, 2003, and was attended

by Jennifer L. Queen, Esquire and Kenneth G. Cooper, Esquire, attorneys for Plaintiff, and Guardian ad Litem Mark A. Leiendecker, Esquire. No defendant made an appearance despite being provided with proper notice. Plaintiff presented a Transcript of Testimony and Supplemental Transcript of Testimony and from the testimony, record, and evidence find, conclude and order as follows:

FINDINGS OF FACT

1. Plaintiffs bring this action pursuant to South Carolina's Uniform Declaratory Judgments Act, Sections 15-53-10, et seq., Code of Laws of South Carolina (1976), as amended, seeking an order from this Honorable Court declaring that they own fee simple absolute title in and to the real property which is the subject of this suit (Property), free and clear of all claims.

2. Plaintiffs are residents of Maryland and New York.

3. Plaintiffs are informed and believe the Defendants are or were residents of Dorchester County or outside South Carolina and may claim some interest in the Property.

4. The real property that is the subject of this suit is situated in Dorchester County, South Carolina, shall be referred to as a whole in this suit as the "Property", and for purposes of this suit is described as follows:

(A) ALL that certain, piece, lot or tract of land containing thirty-five and one third ($35 \frac{1}{3}$) acres, more or less, situate, lying and being in the County of Colleton and State aforesaid, situated near the Edisto River and having the following boundaries to-wit North by lands of James Perry, South by lands of Richard Geddis, East by lands of Mrs. Regina Yonahan and West by lands of Isaac Singleton.

BEING the same premises conveyed to Irving T. Geddis, Sr., by deed of Adam E. Geddis, Katie Geddis, George E. Geddis, Maggie L. Thompson, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Angie S. Minfee and Omisha A. Geddis dated August 31, 1954 and recorded in the RMC Office for Dorchester

County in Deed Book 109, at page 73.

TMS No.: 174-00-00-007

- (B) ALL that piece, parcel or tract of land containing fourteen and one-half (14 1/2) acres more or less and bounded as follows: North by Julia Wade; East by Rice; South by land cut off for Murray West by Edwards Rivers. Said land situated on the Block Hill Road near Owthous Perry and situated in County and State aforesaid.

TMS No.: 140-00-00-036

- (C) ALL that piece, parcel or tract of land situated on the Block Hill Road near Owthous Ferry binding on the West by Edisto River, County and State aforesaid containing Twenty One and one-fourth (21 1/4) acres more or less boundaries as follows: North by Julia Wade; East by Public Road; South by E.M. Redman; West by Edisto River. Said land surveyed as for the Last Will and Testament of Richard Washington.

BEING the same premises conveyed to Irving T. Geddis, Sr., by deed of Maggie Thompson, Adam E. Geddis, George E. Geddis, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Glenn, Constance Geddis, Katie Geddis, Angie S. Minfee, James Minfee and Ornisha A. Geddis dated August 21, 1954 and recorded in the RMC Office for Dorchester County in Deed Book 109, at page 085.

TMS No.: 139-00-00-008

5. All matter alleged to be recorded is alleged to be recorded in the Dorchester County Register of Deeds Office or the Dorchester County Probate Court, as appropriate. All allegations of examinations of public records are alleged to be examinations of public records in Dorchester County government departments.

6. This action was commenced with the filing of a Summons, Complaint, and Lis Pendens on or about April 8, 2002.

7. Personal service of the Summons, Complaint, and Lis Pendens was obtained on

Defendants Estate of George Geddis, Estate of Omisha Geddis, Roberta Blount, Harry Glenn, Thelma Glenn, James Minfee, the Estate of Harry Geddis, Joshua Geddis, Joseph Geddis, and the Estate of Katie Geddis as indicated in the Proofs of Service filed in this case.

8. All other Defendants were served through publication as indicated in the Affidavit of Publication.

9. No Defendant filed an Answer, made a motion, or made any other appearance in this action.

10. Attorney Mark A. Leiendecker was appointed Guardian ad Litem in this matter pursuant to the order of the Honorable Diane S. Goodstein. Mr. Leiendecker was not contacted by anyone in response to the publication of this matter.

11. All real property listed in paragraph four (4) above was conveyed by Julia Wade, Eddie Rivers and L.B. Benester to Harry Geddis and said conveyance was recorded in the Dorchester County RMC's office at Book 32, page 234 on September 24, 1918.¹

12. All real property listed in paragraph four (4) above was conveyed by Adam E. Geddis, Maggie L. Thompson, George E. Geddis, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Katie Geddis, Angie S. Minfee, James Minfee, Ornisha A. Geddis by deed to Irving T. Geddis, Sr. and said conveyance was recorded with Dorchester County RMC at Book 109, page 83 on September 24, 1954.

13. All real property listed in paragraph four (4) above was conveyed by Deed of

¹Copies of the documents referenced in Paragraphs 11, 12 and 13 are filed with the Court record of this case.

Distribution to Plaintiffs Irving T. Geddis, Jr. and Irma Carroll.

14. After diligent examination Plaintiff's agents found no public record of any lifetime conveyance of the Property by Harry Geddis, Adam E. Geddis, Maggie L. Thompson, George E. Geddis, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Katie Geddis, Angie S. Minfee, James Minfee, Omisha A. Geddis or Irving T. Geddis, Sr., or any of their heirs other than that listed in Paragraph 12.

15. After diligent examination, Plaintiff's agents found no public record of the administration of the estate of Harry Geddis.

16. Upon information and belief, Adam E. Geddis, Maggie L. Thompson, George E. Geddis, Erma Geddis, Albert E. Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Katie Geddis, Angie S. Minfee, James Minfee, Omisha A. Geddis are the sole heirs of Harry Geddis.

17. Irving T. Geddis, Sr., and his heirs and parties in interest ("the Geddis family") occupied and used the Property as their own under color of title for a period spanning over twenty consecutive years and more specifically, they used the land for harvesting timber.

18. The Geddis family's occupation and possession of the Property was continuous, hostile, open, actual, notorious, and exclusive.

19. By virtue of that occupation and possession under color of title, the Geddis family acquired fee simple absolute title to the Property free and clear of all claims, pursuant to Section 15-67-220, Code.

20. By virtue of the deed more fully described in Paragraph 12 above any interests or right claimed by Adam E. Geddis, Maggie L. Thompson, George E. Geddis, Erma Geddis, Albert E.

Geddis, Lilla Geddis, Harry Glenn, Thelma Glenn, Joshua Glenn, Joseph Glenn, Robert W. Geddis, Constance Geddis, Katie Geddis, Angie S. Minfee, James Minfee, Ornisha A. Geddis or their heirs should be extinguished.

CONCLUSIONS OF LAW

1. The Property is jointly owned by the Plaintiffs pursuant to Deed of Distribution from Estate of Irving Geddis, Sr.
2. Any claim by any individual or entity as to title to, claim or demand against, or lien or encumbrance upon the said land, are unjust and all such claims which Defendants may have had upon the Property are wholly and effectually extinguished, cut off and Defendants are barred from making any claim thereto, and any cloud upon the title to the said premises are removed therefrom.

WHEREFORE, it is

ORDERED, ADJUDGED, and DECREED that

1. Fee simple title to the Property is quieted and confirmed to be vested in Plaintiff Irving T. Geddis, Jr. and Irma Carroll.
2. The claim of any other person to any right, title, interest, claim or estate in or to the Property is forever cut off and barred.

AND IT IS SO ORDERED.

January 7, 2004
Summerville, South Carolina

This day of December, 2003.

S:\LITIGATION\Geddis Irving 01-375\Masters Report and Order2.wpd

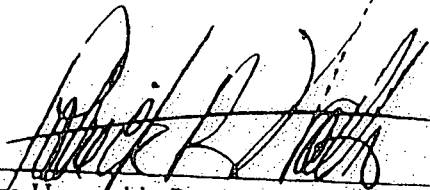

The Honorable Patrick R. Watts
Dorchester County Master-in-Equity

Exhibit B

**Deed of Distribution of the Estate of Irma G. Carroll
Recorded in the Office of the Register of Deeds for Dorchester County
in Book 5189 at Page 237**

A handwritten signature in dark ink, appearing to be 'JFS', located in the bottom left corner of the page.

BK 5189PG237

Return to:
Haines and McNeill, LLC
800 Johnnie Dodds Blvd
Mt. Pleasant, SC 29464

FILED - RECORDED
RMC / ROD

2006 FEB -8 PM 12:08

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

MARGARET L. BAILEY
DORCHESTER COUNTY, SC

PROBATE COURT

IN THE MATTER OF IRMA G. CARROLL

CASE NUMBER 2005-ES-18-00064

DORCHESTER COUNTY

SO Dead Res Fee _____

Der On Dead Res Fee _____

Filing Fee 10.00

Exemption 0 1

MARGARET L. BAILEY
Register of Deeds

DEED OF DISTRIBUTION

Title not examined by Haines and McNeill, LLC

WHEREAS, the decedent died on the 4th day of May, 2004; and,

WHEREAS, the estate of the decedent is being administered in the Probate Court for
Dorchester County, South Carolina in File #2005-ES-18-00064; and,

WHEREAS, the grantee herein is either a beneficiary or heir at law, as appropriate, of the
decedent; and,

WHEREAS, the undersigned Personal Representative is the duly appointed and qualified
fiduciary in this matter; and,

NOW, THEREFORE, in accordance with the laws of the State of South Carolina, the
Personal Representative has granted, bargained, sold and released, and by these Presents
does grant, bargain, sell and release to:

Name: Harry M. Carroll

Barbara C. Stancil

Joanne C. Wade

Address: 9121 Bengal Road

8707 Stephanie Road

3232 Carlisle Avenue

Randallstown, MD 21133

Randallstown, MD 21133

Baltimore, MD 21216

all the decedent's interest in and to the following described property:

ALL that certain piece, parcel, or tract of land containing thirty-five and one-third (35 1/3)
acres, more or less, situate, lying and being in the County of Dorchester and State
aforesaid, situated near the Edisto River and having the following boundaries: to the
North by lands of James Perry; South by lands of Richard Geddis; East by lands of Mrs.
Regina Yonahan; and West by lands of Isaac Singleton.

BEING the same premises as conveyed to Irving T. Geddis, Jr., and Irma Carroll a/k/a Irma
G. Carroll by deed of distribution of The Estate of Irving T. Geddis, Sr., dated October 15,
1994, and recorded November 3, 1994, in the RMC Office for Dorchester County in Book
1393, Page 166.

TMS 174-00-00-007

ALSO

ALL that piece, parcel, or tract of land containing fourteen and one-half (14 1/2) acres
more or less and bounded as follows: North by Julia Wade; East by Rice; South by
Landcut off for Murray; West by Edward Rivers. Said land situated on the Block Hill

Haines McNeill
P.O. Box 1099
Mt. Pleasant, SC
29465

049

Case Number: 2005-ES-18-00064

Road near Owthous Perry and situated in County and State aforesaid.

BEING a portion of the same premises as conveyed to Irving T. Geddis, Jr., and Irma Carroll a/k/a Irma G. Carroll by deed of distribution of The Estate of Irving T. Geddis, Sr., dated October 15, 1994, and recorded November 3, 1994, in the RMC Office for Dorchester County in Book 1393, Page 170.

TMS 140-00-00-036

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises/Property belonging, or in anywise incident or appertaining.

TO HAVE AND TO HOLD, all and singular, the said Property unto the said Harry M. Carroll, Barbara C. Stancil, and Joanne C. Wade, their heirs and assigns, forever.

IN WITNESS WHEREOF, the undersigned, as Personal Representative of the estate of the decedent, has executed this Deed, this 3rd day of January, 2006.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF

Estate of: Irma G. Carroll

By: Harry M. Carroll, Personal
Representative

Witness: And K. HignestallWitness: Robert M. Kade

STATE OF Maryland
COUNTY OF Anne Arundel)

PROBATE

PERSONALLY appeared before me the undersigned witness and made oath that he/she saw the within named Personal Representative(s) sign, seal, and as their act and deed, deliver the within written Deed, and that he/she with the other subscribed witness witnessed the execution thereof.

SWORN to before me this 3rd day of
January, 2006.

And K. Hignestall
Notary Public for

My Commission Expires: 2/1/07

Robert M. Kade

Exhibit C

Survey entitled "Boundary Survey of 54.03 Acres Owned by Irving T. Geddis, Jr. & Irma Carroll Geddisville Area, Dorchester County, South Carolina"

prepared by Robert J. Sample, P.E., R.L.S.

**dated September 12, 2006, and recorded in the Office of the
Register of Deeds for Dorchester County in Plat Book L at Page 32**

L-32
FILED-RECORDED
P/MC 7/300 #112

2006 OCT 11 PM 2:11

HANDWRITTEN BY
DORCHESTER COUNTY, SC

DORCHESTER COUNTY PLANNING COMMISSION

EXEMPT under Provision of ARTICLE

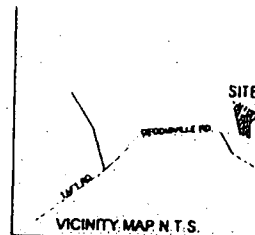
XVII 17.11(2) Dorchester

County Mapping and Information Services

OCT 02 2006 DAY

THE FEDERAL INSURANCE ADMINISTRATION
FLOOD HAZARD BOUNDARY MAP AND FLOOD
THE SURVEY DESCRIBED IS NOT LOCATED
IN A SPECIAL FLOOD HAZARD AREA
OR AREA HAS DETERMINED BY THE COORDINATE
METHOD AND ALL INFORMATION SHOWN ON
THIS PLAT OUTSIDE THE SURVEYED PROPERTY
LIMITS IS FOR DESCRIPTIVE INFORMATION ONLY.
ALL REFERENCE MATERIALS ON THIS PLAT
WERE USED TO PERFORM THIS SURVEY ONLY.
THERE HAS NOT BEEN ANY TITLE SEARCH TO
ADJUST THE INFORMATION SHOWN
IN THERE HAS BEEN NO SURVEY DONE TO DETER-
MINE WETLANDS AND/OR UNBUILT STRUCTURES
TO PREVENT DEVELOPMENT OF THIS PROPERTY

A
LAND ZONED C-200



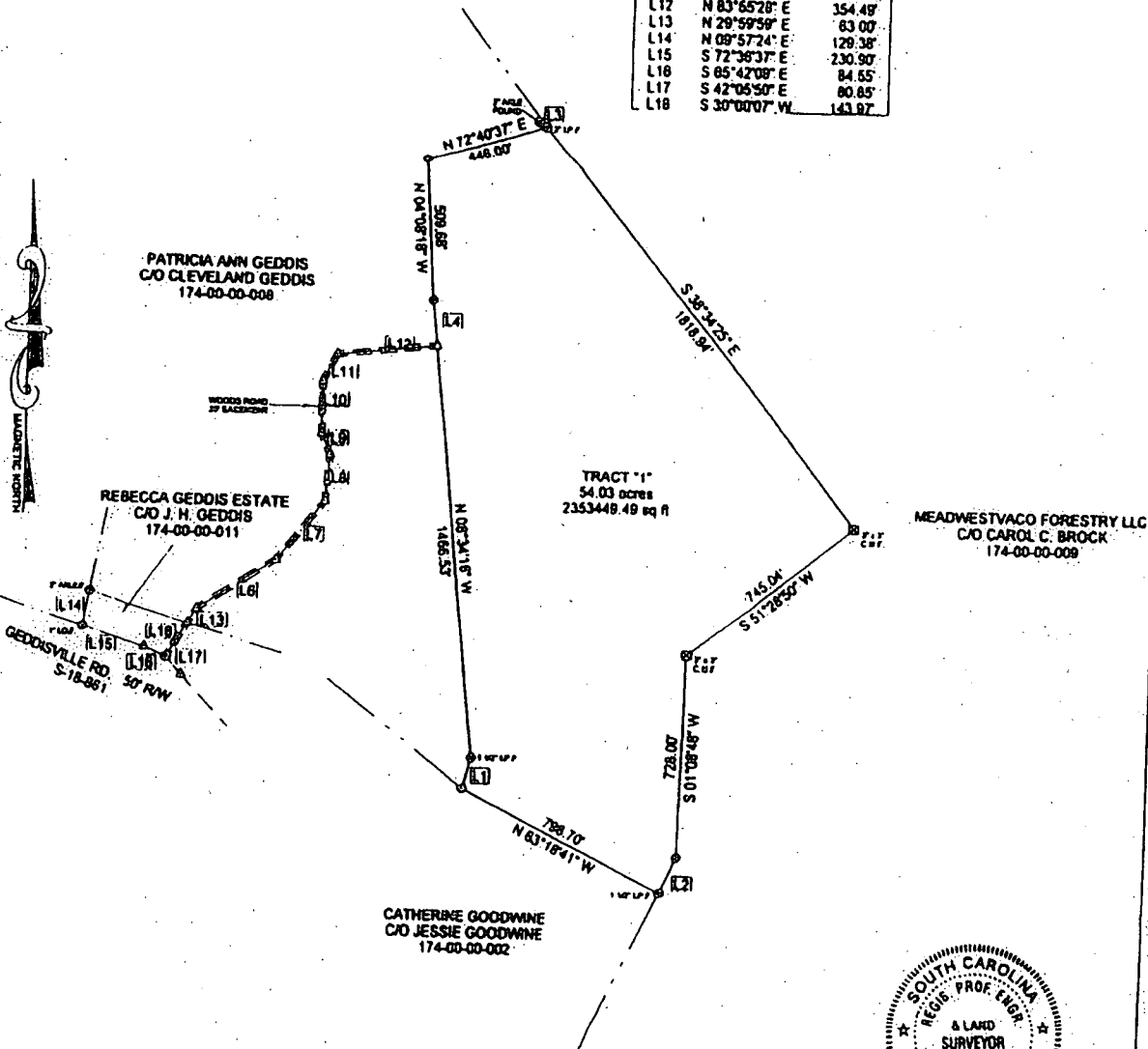
VICINITY MAP N.T.S.
TMS# 174-00-00-007
DEED REF: BOOK 1393 @ PG 168
PLAT REF: BOOK 11 @ PG 095

IRF: IRON ROD FOUND
IRS: IRON ROD SET
IPF: IRON PIPE FOUND
IPS: IRON PIPE SET
CMF: CONCRETE MONUMENT
A: CALCULATED POINT

NOTE: 1/2" IRON RODS SET ON ALL
CORNERS NOT LABELED OTHERWISE

IR	Bearing	Distance
L1	N 14°53'22" E	115.00'
L2	S 22°59'41" W	138.03'
L3	S 57°02'48" E	34.73'
L4	N 08°32'22" W	174.18'
L6	N 55°27'34" E	318.58'
L7	N 36°52'36" E	265.82'
L8	N 04°10'28" E	187.48'
L9	N 23°07'04" W	82.78'
L10	N 00°03'52" W	188.64'
L11	N 26°30'48" E	108.94'
L12	N 83°55'28" E	154.49'
L13	N 29°59'59" E	83.00'
L14	N 09°57'24" E	129.38'
L15	S 72°36'37" E	230.90'
L16	S 65°42'08" E	84.55'
L17	S 42°05'50" E	80.85'
L18	S 30°00'07" W	143.97'

THIS LAND IS SITUATED IN A FLOOD ZONE "X"
AS PER FEMA MAP NUMBER 450088300C
DATED APRIL 15, 1994



BOUNDARY SURVEY OF 54.03 ACRES
OWNED BY
IRVING T. GEDDIS JR. & IRMA CARROLL
GEDDISVILLE AREA
DORCHESTER COUNTY, SOUTH CAROLINA

SEPTEMBER 12, 2006 REV. 9-28-06

ROBERT J. SAMPLE, P.E., R.L.S.
P.O. BOX 31283 CHARLESTON, S.C. 29407
(843) 764-8224

SCALE 1" = 400'
0 200 400

I HEREBY STATE TO THE BEST OF MY KNOWLEDGE
AND BELIEF THAT THE SURVEY SHOWN HEREON WAS
MADE IN ACCORDANCE WITH THE REQUIREMENTS OF
THE MORALITY STANDARDS MANUAL FOR THE PRACTICE
OF LAND SURVEYING IN SOUTH CAROLINA AND MEETS
OR EXCEEDS THE REQUIREMENTS FOR A CLASS "A"
SURVEY AS SPECIFIED THEREIN

ROBERT J. SAMPLE PLS# 8135

Exhibit D

Survey entitled "Plat of Thirty Five and Three Fourths Acres of land situated on Block Hill South of Givhans Ferry, county and state aforesaid said land out of Richard Washington Estate for Harry Geddis, per will," prepared by C. E. Durant, Surveyor dated September 24, 1918, and recorded in the Office of the Register of Deeds for Dorchester County

A handwritten signature, possibly reading "J. E. Durant", is located in the bottom left corner of the page.



South Carolina
Dorchester County

Plat of Thirty Five and Three Fourths
Acres of land situated on Toccoa Hill
south of Sirhams Ferry, County and
state aforesaid
Said land cut off Richard Washington
Estate for Harry Gaddis, as per will.
Sept. 24. 1918.

L. E. Putnam
Surveyor

Exhibit E

Survey entitled "PLAT SHOWING THE TRACT 1 (53.80 ACRES), PROPERTY OF IRVING T. GEDDIS, JR., BARBARA STANCIL, JOANNE WADE AND HARRY M. CARROLL, LOCATED IN GEDDISVILLE AREA, DORCHESTER COUNTY, SOUTH CAROLINA" prepared by Robert J. Sample, P.E. R.L.S. dated August 3, 2011 and revised October 1, 2011 to be recorded to supersede Plat recorded in Book L at Page 32 dates 9-28-2006.

A handwritten signature, possibly reading "JBS", is located in the bottom left corner of the page.

THIS PLAT TO SUPERCEDE PLAT RECORDED
IN BOOK L AT PAGE 32
DATED 9-28-2006

FILED-RECORDED
SNC 7-800

2012 JAN 10 AM 9:07

MARGARET L. ORILEE
DORCHESTER COUNTY, SC

L1 S 22°00'23" W 144.78
L2 N 14°53'16" E 113.00
L3 N 08°32'25" W 174.18
L4 S 58°12'30" E 34.73

NOTE PLAT IS BEING REVISED FROM POINT A TO
POINT E TO SHOW THE CORRECT PROPERTY LINES

DORCHESTER COUNTY PLANNING COMMISSION

EXEMPT under Provision of ARTICLE

ZVI 17.1.1(e) - Dorchester

County Zoning and Land Development Standards

JAN 10 2012

DATE

EXISTING WOODS ROAD
20' EASEMENT
(SEE BOOK L PG 32)

PROPERTY OF
PATRICIA ANN GEDDIS
C/O CLEVELAND GEDDIS
TMS 174-00-00-008.000

TRACT 1
2,343,654.47 SQ FT
53.80 ACRES

PROPERTY OF
MMV-EAST EDISTO DORCHESTER,
LLC.
TMS 174-00-00-009.000

LOCATION MAP
(NOT TO SCALE)
TMS 174-00-00-007
DEED REF. BOOK 1393, PG. 168
PLAT REF. BOOK 11, PAGE 95
BOOK J, PG 131
BOOK L, PG 32

NOTES
(1) THIS PROPERTY IS LOCATED IN
FLOOD ZONE X AND AE PCP F.L.R.M.
COMMUNITY PANEL 430068 0300C
DATED 4/15/94
(2) AREA WAS DETERMINED BY THE
COORDINATE METHOD AND ALL
INFORMATION SHOWN ON THIS PLAT
OUTSIDE THE SURVEYED PROPERTY
LINES IS FOR DESCRIPTIVE
INFORMATION ONLY.
(3) ALL REFERENCED MATERIALS ON
THIS PLAT WERE USED TO PERFORM
THIS SURVEY ONLY. THERE HAS NOT
BEEN ANY TITLE SEARCH TO ACQUIRE
INFORMATION SHOWN.
(4) THERE HAS BEEN NO SURVEY
DONE TO DETERMINE WETLANDS
AND/OR UNSEEN STRUCTURES TO
PROHIBIT DEVELOPMENT OF THIS
PROPERTY.

LEGEND

PROPERTY LINE WITH PROPERTY CORNER FOUND (AS DESCRIBED)
PROPERTY LINE WITH PROPERTY CORNER SET (1/2" REBAR)
ADJACENT PROPERTY LINE
RIGHT OF WAY LINE
CENTERLINE OF RIGHT OF WAY
EASEMENT LINE

0 150 300 600
(IN FEET)
1 inch = 300 ft

I HEREBY STATE TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND
BELIEF, THE SURVEY SHOWN HEREON WAS MADE IN ACCORDANCE
WITH THE REQUIREMENTS OF THE MINIMUM STANDARDS MANUAL FOR
THE PRACTICE OF LAND SURVEYING IN SOUTH CAROLINA, AND MEETS
OR EXCEEDS THE REQUIREMENTS FOR A CLASS C SURVEY AS
SPECIFIED THEREIN.

ROBERT J. SAMPLE, P.E. R.L.S. SCPLS No. 6135

PLAT

SHOWING THE TRACT 1 (53.80 ACRES), PROPERTY OF
IRVING T. GEDDIS, JR., BARBARA STANCIL, JOANNE
WADE, & HARRY M. CARROLL, LOCATED IN GEDDISVILLE
AREA, DORCHESTER COUNTY, SOUTH CAROLINA.

DATE: AUGUST 30, 2011
REVISED: OCTOBER 1, 2011

SCALE: 1" = 300'

ROBERT J. SAMPLE, P.E. R.L.S.
PO BOX 31263 CHARLESTON, SC 29407
Phone: (843) 766-8224

PROPERTY OF
CATHERINE GOODWINE
C/O TEDDY GOODWINE
TMS 174-00-00-002.000

056

[Handwritten signature]

and Cleveland Geddis will move on the tenth day after the date of these presents, or as soon thereafter as counsel may be heard, before Patrick R. Watts, Special Referee, to reconsider the ruling on his Special Referee's Report and Final Order dated January 20, 2012 and for a new trial. This motion is made pursuant to Rules 52, 59, and 60 of the South Carolina Rules of Civil Procedure. This Motion shall be based upon the the filed pleadings, the case file, applicable South Carolina statutory and case law, and on the following grounds:

1. The evidence presented at trial was not sufficient to support the finding by the Court that the Plaintiffs have fee simple absolute title to the Property, free of all claims, pursuant to Section 15-67-220, Code of Laws of South Carolina (1976), as amended.
2. The evidence presented at trial was not sufficient to prove the Plaintiffs and/or their predecessors in interest used all 53.8 acres of the Property and such use was actual, open, hostile, notorious, continuous, and exclusive for a period in excess of 88 years. Exhibit A to the Special Referee's Report and Final Order is evidence that Plaintiffs and their predecessors in title did not believe in 2004 that they owned any more than 35 1/3 acres.
3. The evidence presented at trial was not sufficient to explain the discrepancy between 35 1/3 acres and 54 acres.
4. A survey entitled, "Forensic Survey Detailing Area Claimed by the Owners of TMS 174-00-00-007 & 008," was completed on December 14, 2011 and confirms the accuracy of the Plat by F.C. Schulz dated August 16, 1888 for Harry Geddis of 35 1/3 acres recorded in Plat Book 11 Page 95, Slide A-42. The December 14, 2011 survey was not completed until after the final hearing in this matter. A copy of the survey

is attached hereto as Exhibit A and incorporated herein by reference. The survey is evidence that the property owned by the Plaintiffs is 35 1/3 acres and not 54 acres.

WHEREFORE, the Defendants Cleveland Geddis and Patrice Geddis pray for an Order of the Court as follows:

- [A] Granting an evidentiary hearing in this matter;
- [B] Granting a new trial; and
- [C] Awarding such other and further relief as this Court deems just and proper.

PLEASE BE PRESENT IF SO MINDED.

CATHERINE E. LAFOND, PA



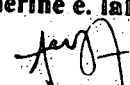
Ashley G. Andrews
Attorney for Patrice Geddis & Cleveland Geddis
544 Savannah Highway
Charleston, SC 29407
843-762-3554
843-377-0111 (fax)

Charleston, South Carolina
February 17, 2012

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of February, 2012, a copy of the foregoing was served on each party or counsel of record by ☒ US Mail, ☐ Email, ☐ Facsimile, or ☐ Hand Delivery in the manner prescribed by the applicable Rule of Civil Procedure

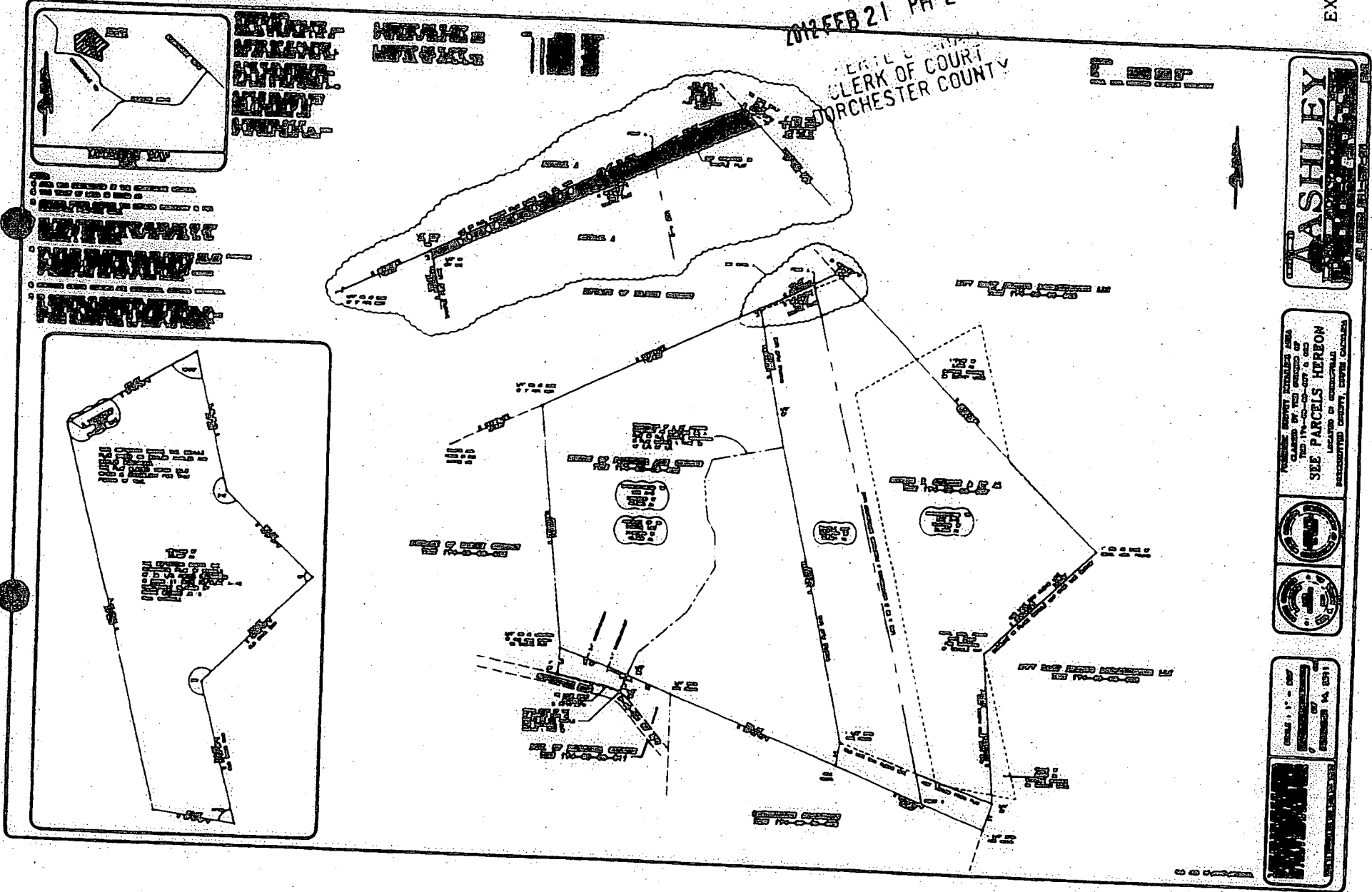
catherine e. lafond, pa

By: 

EQ-RECORDED
2012 FEB 21 PM 2:29

CLERK OF COURT
DORCHESTER COUNTY

EXH 060
A



STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

11:11 AM
FEB 14 PM 2:10
IN THE COURT OF COMMON PLEAS
CASE NUMBER: 2007-CP-18-2140

IRVING T. GEDDIS, JR., HARRY M.
CARROLL, BARBARA C. STANCIL, AND
JOANNE C. WADE,

Plaintiffs,

vs.

REBECCA GEDDIS, PATRICIA ANN
GEDDIS, CLEVELAND GEDDIS et al,
Defendants.

ORDER DENYING MOTION

On February 21, 2012, Defendants Cleveland Geddis and Patrice Geddis filed a Motion To Reconsider, Alter and Amend Decree and For New Trial. They asked this Court to reconsider its Special Referee's Report And Final Order for this case, signed January 18, 2012, filed January 20, 2012.

On August 14, 2012, this Court conducted the hearing on that motion. Attending were, Cleveland Geddis, Patrice Geddis, and Ashley G. Andrews, Esq., their attorney; and Irving T. Geddis, Jr., Harry M. Carroll, and William E. McIntosh, Esq., their attorney.

After due deliberation upon the record, the evidence and argument the parties presented and the applicable law, this Court concludes that the motion should be denied entirely. This is a reversal of what this Court ruled from the bench at the hearing. Further, lengthy deliberation convinces this Court to rule otherwise.

FINDINGS OF FACT

In April 2002 Plaintiffs commenced a suit to quiet title to the subject property. That case was number 2002-CP-18-593.

The bases for their claim were a deed into Harry Geddis recorded in the Dorchester County Register of Deeds office on September 24, 1918, in Book 32, page 234, and a deed into Irving T. Geddis, Sr. by the heirs of Harry Geddis dated August 31, 1954, and recorded in Book 109, page 73.

These deeds described the subject property as containing 35 1/3 acres near the Edisto River, bounded on all sides by lands of other named land owners. According to the legal description the westerly boundary of the subject property was bounded by lands of Isaac Singleton.



On January 12, 2004, the Master's Report and Final Order was enrolled quieting title in the Plaintiffs.

In September 2006 the Plaintiffs had the subject property surveyed. The plat showed about 54 acres, not 35 1/3. They recorded that plat on October 11, 2006, in Plat Cabinet L, Slide 32.

In November 2007 the Plaintiffs commenced this suit to quiet title to the same property. This time they asserted ownership over 54 acres and named as defendants all the adjacent land owners.

In their *Lis Pendens* for this case Plaintiffs stated that the property on the west of the subject property was 76.4 acres inherited by Patricia Ann Geddis upon the death of Thomas Singleton, as shown in his estate file numbered 77-ES-18-105. The Devise/Descent form for this property was filed with the Probate Court in April 1982.

The only defendant to serve an Answer was Patricia Ann Geddis' daughter Patrice Geddis. She filed no counterclaim. She filed the most basic of general denials.

Patricia Ann Geddis is likewise deceased. Her estate is on record as case number 98-ES-18-72. That record notes that her sole heirs are her husband Cleveland Geddis and her daughter Patrice Geddis.

On November 17, 2011, this court conducted the trial on the merits of this case. Ms. Patrice Geddis and Mr. Cleveland Geddis attended without legal counsel and participated. Their theory was that if Plaintiffs claim 54 acres when the only deed of record states 35 1/3 acres, then that extra 19 acres must be part of their property. Ms. Patrice testified about some of her family's use of those 19 acres. Some of her family hunt deer out there.

On January 18, 2012, this court issued its order quieting title in Plaintiffs to about 53.8 acres. Plaintiffs and Defendant MWV Community Development and Land Management, LLC had compromised on the location of a common boundary line, which lessened Plaintiffs' acreage. The ruling left intact the common boundary line Plaintiffs claim between their property and Patrice and Cleveland's.

Since they were not represented by counsel and they were genuinely interested in the outcome of this case, this Court gave Ms. Patrice and Mr. Cleveland thirty days to seek legal counsel and file any motion for reconsideration. On February 12, 2012, they did just that.



At the August 14, 2012, hearing, their theory again was that if Plaintiffs get 54 acres, then they lose 19 of their 76 acres. Ms. Patrice testified about how some of her family hunt those 19 acres. She stated that the tax bill for her mother's property is for 76 acres. She presented no evidence about the record title to her mother's property, such as deeds, plats or probate records.

Ms. Patrice's motion referred to an attached plat of a forensic survey by Ashley Land Surveying, Inc. which overlaid a 35 1/3 acre parcel over Plaintiffs' 53.8 acre parcel. She presented that plat at the hearing. It was based upon comparisons of other plats and little field work. It showed substantial projections of the 35 acre parcel across common boundary lines with MWV East Edisto Dorchester LLC.

Another exhibit admitted at the hearing was the Dorchester County GIS Online Property Report for Patrice and Cleveland's property. It noted that the property is in the name of Patricia Ann Geddis, that she acquired it from Thomas Singleton, and that it contains 76.4 acres. It includes an outline of the shape, location and extent of their property.

Yet another exhibit admitted at the hearing was the Dorchester County GIS Online Property Report for Plaintiffs' property. It shows that property containing 54 acres. It also includes an outline of the shape, location and extent of their property.

CONCLUSIONS

This Court erred at the motion hearing when it ruled from the bench that Plaintiffs had failed to meet their burden of proof to establish their adverse possession of the subject property at the trial on the merits. Upon further deliberation about the evidence and argument of the parties, this Court now reverses that bench ruling and finds that Plaintiffs did meet their burden. They had testified under oath about the long time use and occupation of the property by their predecessors. They produced a plat drawn from long recognized county records. Ms. Patrice's testimony about some of her family's use of part of Plaintiff's property was too inexplicit and insubstantial to militate against Plaintiff's evidence.

By this Court's ruling in Plaintiff's favor, Cleveland and Patrice lose nothing. They are not harmed. Ms. Patrice acknowledged that her mother inherited 76 acres, that she was paying taxes on 76 acres and that the GIS Property Report showed her property was still 76 acres, right alongside Plaintiff's 54 acres. According to county records there is no overlap.



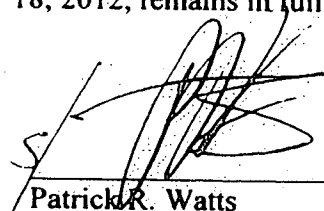
This Court discounts Mr. Cleveland's and Ms. Patrice's forensic survey entirely. When this Court compared that plat with the GIS Property Report of Cleveland's and Patrice's property, it finally noticed that the plat fails to account for a huge segment of their property to the north. The forensic plat's depiction of the shape and size of their property does not comport at all with the GIS Property Report's depiction. What the Property Report shows as roughly the northern half of their property, the plat identifies as land of the estate of March Geddis. Mr. Cleveland and Ms. Patrice should have pointed out and explained that glaring contradiction at the motion hearing. As they failed to do so, their survey, and their argument, have no merit. If they are going to bedevil Plaintiffs in court about the location and extent of their property, they need to give the court much more reliable information about the location and extent of their own property.

ORDERS

Based upon the foregoing findings and conclusions this Court denies entirely Patrice and Cleveland's motion to reconsider, alter or amend and for new trial. The Special Referee's Report and Final Order in this case issued January 18, 2012, remains in full force and effect.

AND IT SO ORDERED.

February 13, 2013
Summerville, South Carolina



Patrick R. Watts
Special Referee for Dorchester County

Geographic InformationProperty Report for Parcel Number:
1740000007.000

Inquiry Date: 11/6/2013

Owner InformationOwner Name: GEDDIS IRVING T JR &
HARRY M CARROLL &
BARBARA STANCIL &
JOANNE WADE

Mailing Address: 19 STANFORD PL

City: MONTCLAIR

State: NJ

Zip Code: 07042

Disclaimer: While every effort is made to keep information provided over the internet accurate and up-to-date, Dorchester County does not certify the authenticity or accuracy of such information. No warranties, express or implied, are provided for the records and/or mapping data herein, or for their use or interpretation by the User. The information is NOTIONAL and not intended for engineering or land conveyance.

Property Information

Parcel Number: 1740000007.000
New Sub Plus Dec: .000
Property Location: GEDDISVILLE RD
Legal Description: TRACT 1
Lot Designator: (Subdiv #)
Subdivision code: 000
Tax District: (First number is school district) 206
Deed Book: 5189
Deed Page: 237
Plat Book: L
Plat Page: 032
GIS Calculated Acreag: 53.80309544
Parent Tax Map number: 0
Previous Owner: GEDDIS IRVING T JR & IRMA

Assessment Information

Current or Future Year: C
Sale Price: \$0
Date of Last Recorded Sale: (YYMMDD) 060208
Acreage: (0 or 1 - may mean one lot) 54.03
Lot Count: 0

Homestead Code:	
Residential Rate:	0
Land Value - RES:	\$0
Building Value - RES:	\$0
Building Count - RES:	0
Land Value - AG:	\$7,350
Building Value - AG:	\$0
Land Value - AG MARKET:	\$243,000
Building Value - AG MARKET:	\$0
Land Value - AG CORP:	\$0
Building Value - AG CORP:	\$0
Land Value - OTHER:	\$0
Building Value - OTHER:	\$0
LAND USE:	VACANT LAND

- End of Report -

[Click Here to Exit and Return to Map](#)

Geographic Information

Property Report for Parcel Number:

1740000008.000

Inquiry Date: 11/6/2013

Owner Information

Owner Name: GEDDIS PATRICIA ANN
 C/O CLEVELAND
 GEDDIS
Mailing Address: 295 GEDDISVILLE RD
City: ADAMS RUN
State: SC
Zip Code: 29426



Disclaimer: While every effort is made to keep information provided over the internet accurate and up-to-date, Dorchester County does not certify the authenticity or accuracy of such information. No warranties, express or implied, are provided for the records and/or mapping data herein, or for their use or interpretation by the User. The information is NOTIONAL and not intended for engineering or land conveyance.

Property Information

Parcel Number:	1740000008.000
New Sub Plus Dec:	.000
Property Location:	GEDDISVILLE RD
Legal Description:	
Lot Designator: (Subdiv #)	
Subdivision code:	000
Tax District: (First number is school district)	206
Deed Book:	0000
Deed Page:	000
Plat Book:	00
Plat Page:	000
GIS Calculated Acreag:	78.09016645
Parent Tax Map number:	0
Previous Owner:	THOMAS SINGLETON

Assessment Information

Current or Future Year:	C
Sale Price:	\$0
Date of Last Recorded Sale: (YYMMDD)	820401
Acreage: (0 or 1 - may mean one lot)	76.4
Lot Count:	0

Homestead Code:	
Residential Rate:	0
Land Value - RES:	\$0
Building Value - RES:	\$0
Building Count - RES:	0
Land Value - AG:	\$10,573
Building Value - AG:	\$0
Land Value - AG MARKET:	\$263,580
Building Value - AG MARKET:	\$0
Land Value - AG CORP:	\$0
Building Value - AG CORP:	\$0
Land Value - OTHER:	\$0
Building Value - OTHER:	\$0
LAND USE:	VACANT LAND

- End of Report -

[Click Here to Exit and Return to Map](#)

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Patrick R. Watts, Special Referee

Case No. 2013-000608

Irving T. Geddis, Jr., Harry M. Carroll, Barbara C. Stancil, & Joanne C. Wade.....Respondents,

v.

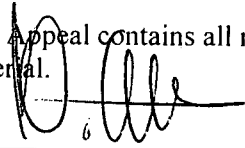
Rebecca Geddis, Patricia Ann Geddis, Cleveland Geddis, John Henry Geddis, Herman Geddis, George Geddis, Patrice Geddis, Joenatham Geddis, Yvonne Geddis Bowens, Gwendolyn P. Spell, Harry P. Geddis, Catherine Goodwine a/k/a Catharine Goodwine, Jessie Goodwine, and any individual who may be claiming an interest in this action as an heir of these individuals, and MWV Community Development and Land Management, LLC, and John Doe and Jane Doe, fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors or assigns of the Defendants named above, and Richard Roe and Mary Roe, fictitious names designating infants and persons under any disability or incompetent, including those persons who might be in the Military Services within the meaning of The Soldier's and Sailor's Civil Relief Act of 1941, Title 50, United States Code, and any other person or legal entity who or which has or claims to have any right title, interest or lien in or to the real property described in this Complaint, Defendants,

Of whom Patrice Geddis is the.....Appellant.

CERTIFICATE OF COUNSEL

The undersigned certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

March 18, 2014


W. Scott Palmer (S.C. Bar No. 0011936)
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wpalmer@santeeattorney.com
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