

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

Case No.: 2011-CP-32-01010
Appellate Case No.: 2013-002056

RECEIVED

DEC 18 2014

SC Court of Appeals

Glenda Renee Couram

Appellant,

v

Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Legal or Equitable Right, Title, state, Lien or interest in the Property Described in the Complaint Adverse to the Plaintiff's; Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities, Carolina Water Svc., (CWS), Carolina Trace Utilities, Inc., & Utilities, Inc., Corporate Offices

Defendants,

Of whom Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities are

Respondents.

SUPPLEMENTAL/APPENDIX TO
RECORD ON APPEAL

PRO SE APPELLANT

Glenda Couram, *pro se*
104 Macaw Lane
Lexington, SC 29073
(803) 358-0127
grcouram@hotmail.com

COUNSEL FOR RESPONDENTS

R. Davis Howser, Esq.
Howser, Newman and Besley, LLC
PO Box 12009
Columbia, SC 29211
(803) 758-9600
rdhowser@hnblaw.com
*Attorney for Respondents Cox and Dinkins,
Inc., and J. Donald "Don" Rawls*

L.A. "Smokey" Brown, Jr., Esq.
Law Offices of Smokey Brown, PC
PO Box 1545
Irmo, SC 29063
(803) 732-3797
smokeybrown@smokeybrownlawfirm.com
*Attorney for Respondents Mr. & Mrs. Carl
Reibold and Mr. & Mrs. Christopher
Hooker*

Steven A. Fair, *pro se*
Registered Agent
Fair Builders/Developers
153 Shirway Road
(100 S Wrenwood Drive)
Lexington, SC 29073
(803) 957-9801

SUPPLEMENTAL RECORD ON APPEAL

EXHIBITS - DEFENDANTS

Page

- 1. Defendants' Exhibit 1 – Draft Surveying, Inc., Closing Survey 1
- 2. Defendants' Exhibit 2 - Photo of Survey/Plat filed by Cox and Dinkins 4
- 3. Defendants' Exhibit 5 and 6 – Photos 5

EXHIBITS – PLAINTIFF’S

- 4. Plaintiff's Exhibit 5 – Appellant's Deed - March 28, 1994 7
- 5. Plaintiff's Exhibit 7 – Wrenwood Subdivision Plat Phase IV 13
November 1990 and June 1991.
- 6. CERTIFICATE OF COUNSEL 15

Defendants
Exhibit 1

Timothy G. Driggers
ATTORNEY AT LAW

117 East Main Street
P.O. Box 1001
Lexington, S.C. 29071

(803) 359-5174
FAX 359-5175

July 14, 1994

Ms. Glenda R. Couram
104 Macaw Lane
Lexington, S.C. 29073

RE: Deed and Plat to Property

Dear Ms. Couram:

Enclosed for your records is the original Deed and Plat to your Wrenwood Subdivision property as recorded with the Office of the Register of Mesne Conveyance for Lexington County.

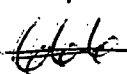
Thank you for allowing me to be of assistance to you.

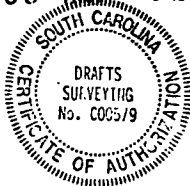
Sincerely,



Timothy G. Driggers

TGD/tmt

1




FILED

MAR 29 3 43 PM '94

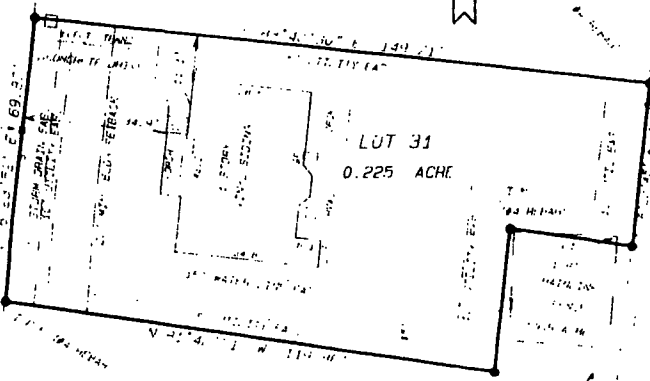
LEXINGTON COUNTY



LOT 32

LOT 45

LOT 41



WRENWOOD ASSOCIATION

NORTH CAROLINA WATER SERV



MACAW LANE 50' R/W

| LINE | BEARING | DISTANCE |
|------|-----------------|----------|
| L1 | N 81° 43' 36" W | 30.00 |
| L2 | S 87° 47' W | 30.00 |
| L3 | S 6° 35' 59" W | 30.00 |
| L4 | N 81° 41' 46" W | 30.00 |

LEXINGTON COUNTY
PLANNING COMMISSION
MAR 29 1994
D. Shelton

CLOSING SURVEY FOR
GLEND A. COURAM
LOCATED IN LEXINGTON COUNTY, SOUTH CAROLINA

SCALE: 1" = 30'



I HEREBY STATE THAT 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 B SURVEY AS SPECIFIED THEREIN. ALSO THERE ARE NO VISIBLE ENCROACHMENTS OR PROJECTIONS OTHER THAN SHOWN.

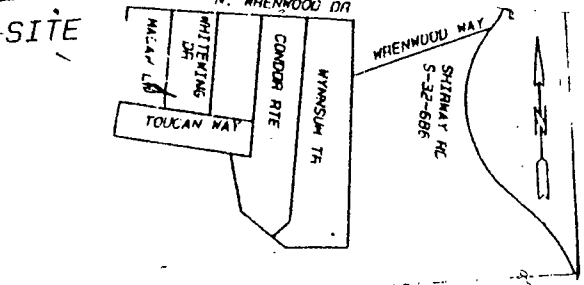
THE ABOVE SHOWN LOT IS ALSO SHOWN AS LOT 31 ON A FINAL PLAT OF WRENWOOD, PHASE IV, DATED JUNE 11, 1991, AND LAST REVISED NOVEMBER 29, 1991 BY PALMITTO ENGINEERING AND SURVEYING CO., INC., RECORDED IN LEXINGTON COUNTY PLAT BOOK 247 AT PAGE 153

14264

I HEREBY CERTIFY THAT I HAVE CONSULTED THE NATIONAL FLOOD INSURANCE PROGRAM, "FLOOD INSURANCE RATE MAP", #450129 WHICH IS EFFECTIVE JUNE 15, 1991, AND DETERMINED THAT THE ABOVE LOT LIES WITHIN THE APPROXIMATE SEALED LIMITS OF ZONE "C", NOT A 100 YEAR FLOOD AREA

[Signature]

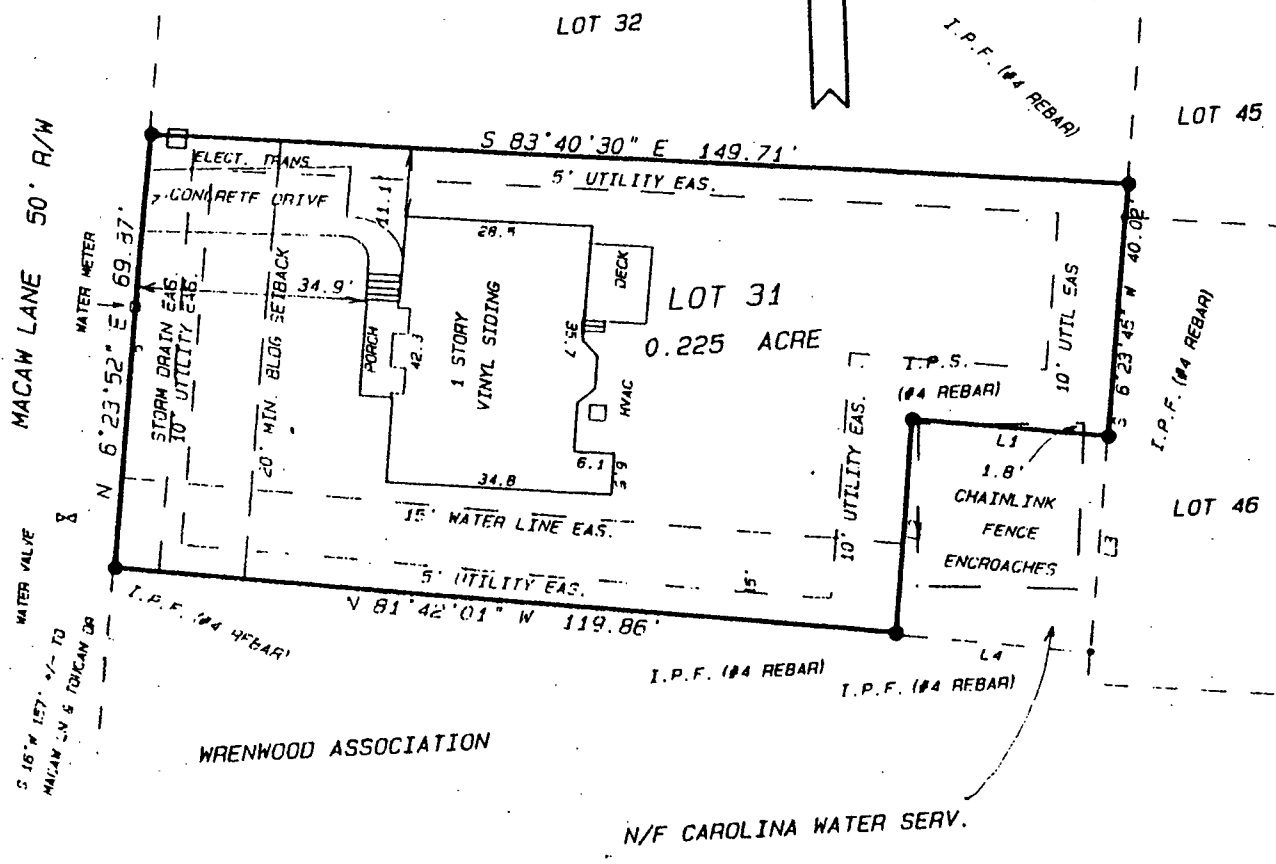
167
2



Defendants
Exhibit 1



LOCATION MAP - NO SCALE



| LINE | BEARING | DISTANCE |
|------|-----------------|----------|
| L1 | N 81° 43' 36" W | 30.00 |
| L2 | S 6° 17' 47" W | 35.00 |
| L3 | S 6° 15' 53" W | 35.02 |
| L4 | N 81° 41' 46" W | 30.02 |

CLOSING SURVEY FOR
GLENDIA R. COURAM
LOCATED IN LEXINGTON COUNTY, SOUTH CAROLINA

SCALE: 1" = 30'

668
3

Defendants' Exhibit 5



Defendant
Exhibit 6



Plaintiff's Exhibit 5

183.30
77.50

BR2950PG059

FORM NO. 118 -- TITLE TO REAL ESTATE BY A CONVEYANCE
COLLECTOR OFFICE COUNTY OF, LEXINGTON, S. C.

FILED

MAR 23 3 44 PM '94

The State of South Carolina,

COUNTY OF LEXINGTON

JOB: TRIBLE
LEXINGTON COUNTY



KNOW ALL MEN BY THESE PRESENTS, That



In the State aforesaid, for and in consideration of the sum of Seventy-Three Hundred and No/100 (\$70,500.00) Dollars

to it in hand paid at and before the signing of these presents, by Glenda R. Couram (the receipt whereof is hereby acknowledged)

in the State aforesaid, has granted, bargained, sold and released, and by these Presents does grant, bargain, sell and release, unto the said

GLEND A. COURAM, HER HEIRS AND ASSIGNS:

All that certain piece, parcel tract or lot of land, with the improvements thereon, situate, lying and being in Lexington County School District Number One, Lexington County, South Carolina, shown and delineated as Lot Number Thirty-one (31) of the Wrenwood Subdivision, Phase 4, containing 0.225 of an Acre, on a plat prepared for Glenda R. Couram by Drafts Surveying, Inc., dated February 24, 1994, and recorded in Plat Book 368, at page 12, in the Office of the Register of Mesne Conveyances for Lexington County.

Lot Number Thirty-one (31) of the Wrenwood Subdivision, Phase 4, has the following boundaries and measurements: Beginning at a point on Macaw Lane where the subject property adjoins Lot Number Thirty-two (32) of the Wrenwood Subdivision, Phase 4, then turning and running S-83-40-30-E along Lot Number Thirty-two (32) of the Wrenwood Subdivision, Phase 4, for a distance of 149.71 feet; then turning and running S-6-23-45-W along Lot Numbers Forty-five (45) and Forty-six (46) of the Wrenwood Subdivision, Phase 4, for a distance of 40.02 feet; then turning and running N-81-43-36-W along property now or formerly of Carolina Water Service for a distance of 30.00 feet; then turning and running S-6-17-47-W along property now or formerly of Carolina Water Service for a distance of 35.00 feet; then turning and running N-81-42-01-W along property of the Wrenwood Association for a distance of 119.85 feet; then turning and running N-6-23-52-E along Macaw Lane, along which it fronts for a distance of 49.87 feet.

This being the identical property conveyed to Steve Hendrix Builders, Inc. by Deed of W.J.S., Incorporated, dated March 25, 1993, and recorded March 26, 1994 in Record Book 2479, at page 126, in the Office of the Register of Mesne Conveyances for Lexington County.

Tax Map Number: 006629-02-001.

Grantee's Address: 104 Macaw Lane, Lexington, S. C. 29073

14265

6
209

BK2950P6060

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

TO HAVE AND TO HOLD, all and singular the said premises before mentioned unto the said Gladia R. Cooper, her Heirs and Assigns forever.

And the said Steve Hendrix Builders, Inc. does hereby bind itself and its successors, to warrant and forever defend all and singular the said premises unto the said Gladia R. Cooper, her Heirs and Assigns, against itself and its successors and against every person whatsoever lawfully claiming or to claim the same, or any part thereof.

IN WITNESS WHEREOF

(True name of Corporation)

has caused

these presents to be executed in its name by

(Name name of President or Vice-President)

its

President, and by

John K. Hendrix

(Last name of Secretary or Treasurer)

its

Secretary

and its corporate seal to be hereto affixed this

28th

day of

March

in the year of our Lord, one thousand nine hundred and

twenty-four

, and in the two

hundred and

seventeenth

year of the Sovereignty and Independence of the United

States of America.

Signed, Sealed and Delivered in Presence of

[Handwritten signatures of witnesses]

Witness

Witness

STEVE HENDRIX BUILDERS, INC. (Seal)

By: John K. Hendrix Secretary

JOHN K. HENDRIX - Secretary

[Handwritten initials]

7 210

FILED

MAY 3 4 22 PM '05

JOANNE P. TRIBBLE
RMC
LEXINGTON COUNTY

The State of South Carolina,
COUNTY OF LEXINGTON

KNOW ALL MEN BY THESE PRESENTS, That

AUGUST KOHN AND COMPANY, INCORPORATED

in the State aforesaid, for and in consideration of the sum of
Five and no/100 (\$5.00) Dollars and other valuable consideration ~~ENCLOSURE~~
to it in hand paid at and before the sealing of these presents, by Carolina Water Service, Inc.
in the State aforesaid, (the receipt whereof is hereby acknowledged)
has granted, bargained, sold and released, and by these Presents does grant, bargain, sell and release, unto the said

CAROLINA WATER SERVICE, INC., its Successors and Assigns:

All that certain piece, parcel or lot of land situate, lying and being near the town of Red Bank in the County of Lexington, State of South Carolina, being shown and designated as "Well Site" on a Plat of Wrenwood Subdivision prepared for August Kohn Co., Inc., by Johnny T. Johnson & Assoc., dated November 8, 1982, revised August 26, 1983, and recorded in the RMC Office for Lexington County South Carolina on 5-3-85 in Plat Book 206 at page 887.

This conveyance is subject to existing easements and to easements and restrictions of record, including those shown on recorded Plats.

This being a portion of the same property conveyed to the Grantor herein by Deed of Wrenwood Corporation dated October 31, 1977, recorded November 8, 1977 in Deed Book 232 at page 1 in the RMC Office for Lexington County.

ALSO, granted hereby is a non-exclusive easement appurtenant to the "Well Site" being conveyed herein to the Grantee, for purposes of ingress and egress for constructing and maintaining a water well on the "Well Site." Said easement is 15 feet in width, as shown and delineated on the above described Plat recorded in Plat Book 206-G at page 887.

TMS# 6628-5-2

GRANTEE'S ADDRESS: 1905 Sunset Boulevard, Post Office Box Drawer 4509,
West Columbia, South Carolina 29171-4509

8
505

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

TO HAVE AND TO HOLD, all and singular the said premises before mentioned unto the said CAROLINA WATER SERVICE, INC., its Successors ~~XXXX~~ and Assigns forever.

INCORPORATED

And the said AUGUST KOHN AND COMPANY, / does hereby bind itself

and its successors, to warrant and forever defend all and singular the said premises unto the said CAROLINA WATER SERVICE, INC., its ^{Successors} ~~XXXX~~ and Assigns, against itself and its successors ~~XXXX~~ lawfully claiming or to claim the same, or any part thereof.

IN WITNESS WHEREOF AUGUST KOHN AND COMPANY, INCORPORATED has caused (Insert name of Corporation)

these presents to be executed in its name by Wade H. Britt, III its (Insert name of President or Vice-President)

President, and by J. Bruce King, Jr. its Vice-President (Insert name of Secretary or Treasurer)

and its corporate seal to be hereto affixed this 1st day of May in the year of our Lord, one thousand nine hundred and eighty-five (1985), and in the ~~XXX~~ two hundred and ninth (209) year of the Sovereignty and Independence of the United States of America.

Signed, Sealed and Delivered in Presence of

Kimi Hall Witness
Carolyn S. Gallaway Witness

AUGUST KOHN AND COMPANY, INCORPORATED (Seal)
By Wade H. Britt, III President.
J. Bruce King, Jr. Vice-President

9206

The State of South Carolina,
COUNTY OF LEXINGTON

PERSONALLY appeared before me **Kim Hall** (Insert name of Witness)

who, in oath, says that he saw the within-named **AUGUST KOHN AND COMPANY, INCORPORATED** (Insert name of Corporation)

by **Wade H. Britt, III** (Insert name of President or Vice-President) its

President and **J. Bruce King, Jr.** (Insert name of Secretary or Treasurer) its Vice-President

sign the within Deed, and the said Corporation, by said officers, seal said Deed, and, as its act and deed, deliver the same, and that he with

Carolyn G. Galloway (Insert name of other Witness) witnessed the

execution thereof.

Kim Hall

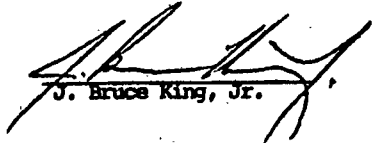
(Witness)

SWORN to before me, this 1st day of May, A. D. 1985.

Carolyn G. Galloway (Seal)
M C E: 1-21-90 Notary Public, S. C.

STATE OF SOUTH CAROLINA)
) AFFIDAVIT
COUNTY OF LEXINGTON)

Personally appeared before me J. Bruce King, Jr., who, being duly sworn, deposes and says that the total consideration for the deed from August Kohn and Company, Incorporated to Carolina Water Service, Inc. did not exceed the sum of \$100.00.


J. Bruce King, Jr.

SWORN to and subscribed before me this 1 day of May 1985.

Caroline S. Gaeremynck (L.S.)
Notary Public for South Carolina

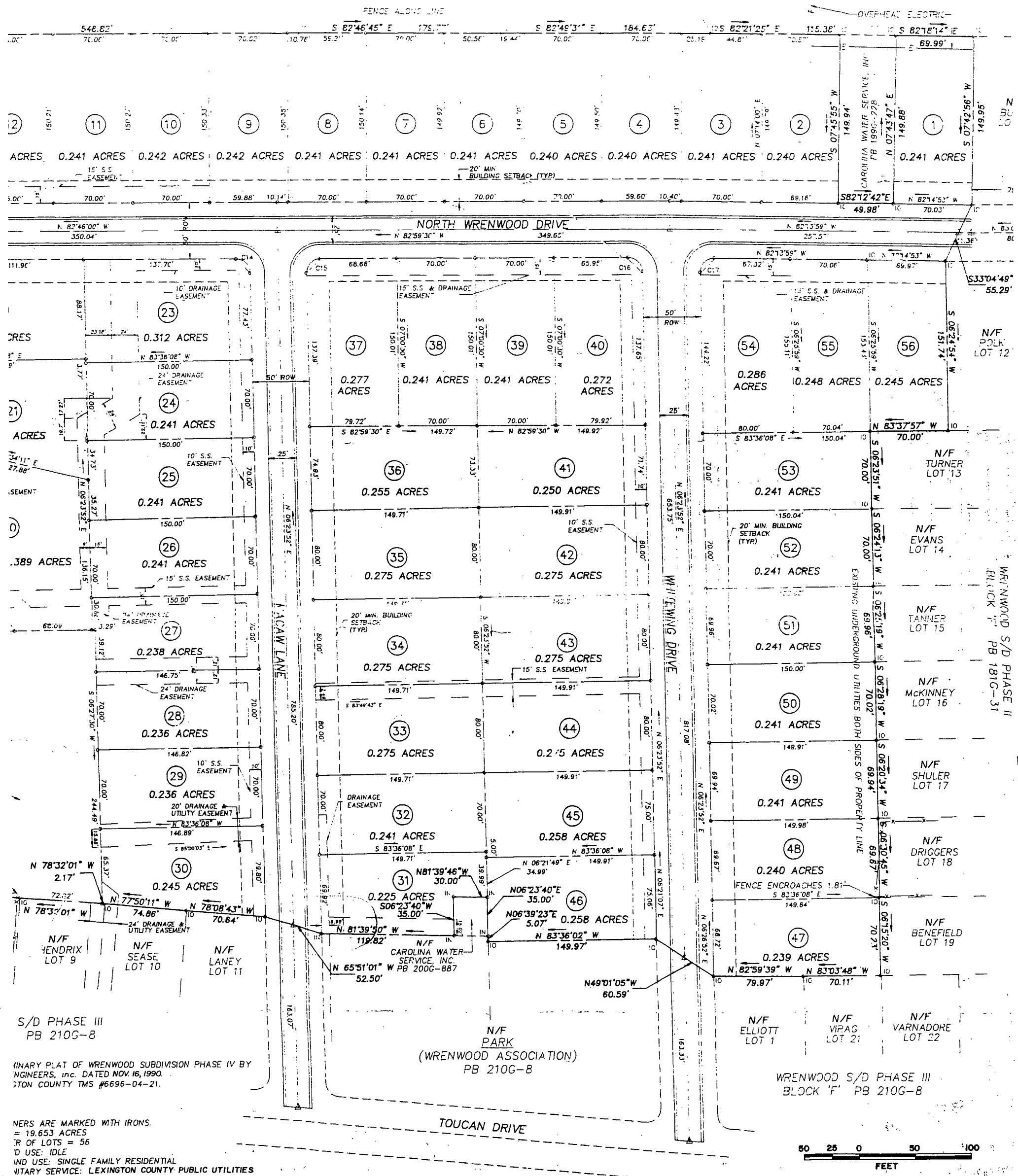
My Commission expires: 1/21/90

11
208

P lot Book 247

N/F
JAMES L. & DORA E. ...
PB 1100-28

N/F
JAMES L. & DORA E. ...
PB 1040-100



S/D PHASE III
PB 210G-8

MINORITY PLAT OF WRENWOOD SUBDIVISION PHASE IV BY
ENGINEERS, INC. DATED NOV. 16, 1990.
STON COUNTY TMS #6696-04-21.

WRENWOOD S/D PHASE III
BLOCK 'F' PB 210G-8

MARKERS ARE MARKED WITH IRONS.
1" = 19.653 ACRES
AREA OF LOTS = 56
LAND USE: IDLE
LAND USE: SINGLE FAMILY RESIDENTIAL
UTILITY SERVICE: LEXINGTON COUNTY PUBLIC UTILITIES

34441

P lot Book 247



13
677

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

Case No.: 2011-CP-32-01010
Appellate Case No.: 2013-002056

Glenda Renee Couram

Appellant,

v

Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Legal or Equitable Right, Title, state, Lien or interest in the Property Described in the Complaint Adverse to the Plaintiff's; Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities, Carolina Water Svc., (CWS), Carolina Trace Utilities, Inc., & Utilities, Inc., Corporate Offices

Defendants,

Of whom Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities are

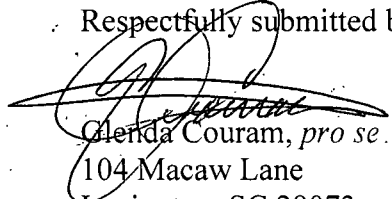
Respondents.

CERTIFICATE OF COUNSEL

The undersigned certifies that the Supplemental Record on Appeal is in substantial compliance and contains all materials specifically ordered to be included pursuant to SCACR 211(a) and 238.

Dated this 20th day of December 2014.

Respectfully submitted by:

A handwritten signature in black ink, appearing to read 'Glenda Couram', is written over a horizontal line. The signature is stylized and somewhat cursive.

Glenda Couram, *pro se*

104 Macaw Lane

Lexington, SC 29073

(803) 896-7509

grcouram@hotmail.com

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

R: Lawton McIntosh, Circuit Court Judge

Case No.: 2011-CP-32-01010
Appellate Case No.: 2013-002056

Glenda Renee Couram

Appellant,

v

Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Legal or Equitable Right, Title, state, Lien or interest in the Property Described in the Complaint Adverse to the Plaintiff's; Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities, Carolina Water Svc., (CWS), Carolina Trace Utilities, Inc., & Utilities, Inc., Corporate Offices

Defendants,

Of whom Mr. & Mrs. Christopher Hooker, Mr. & Mrs. Carl Riebold, Cox & Dinkins, Inc., Fair Builders/Developers, Inc., J. Donald "Don" Rawls & Steve Fair in their official and individual capacities are

Respondents.

PROOF OF SERVICE

I, the undersigned, hereby, certify that the *pro se* Appellant personally served or hand delivered a copy of the *SUPPLEMENTAL RECORD ON APPEAL* on each Respondent as listed below by causing a copy of the same to be deposited in a U.S. postal service mailbox with adequate postage prepaid, addressed as

RECEIVED

DEC 18 2014

SC Court of Appeals

follows this 20th day of December 2014:

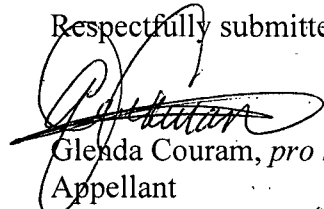
Steven A. Fair, *pro se*
Registered Agent
Fair Builders/Developers, Inc.
153 Shirway Road
Lexington, SC 29073

Law Office of Smokey Brown, PC
PO Box 1545
Irmo, SC 29063

R. Davis Howser, Esq.
Howser, Newman & Besley, L.L.C.
P.O. Box 12009
Columbia, SC 29211-2009

Steve Fair, *pro se*
Registered Agent
100 S. Wrenwood Drive
Lexington, SC 29073

Respectfully submitted by:


Glenda Couram, *pro se*
Appellant
104 Macaw Lane
Lexington, SC 29073
(803) 896-7509
grcouram@hotmail.com

December 20th, 2014
Lexington, South Carolina