

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

Court of Common Pleas, Spartanburg County  
Honorable J. Derham Cole, Circuit Judge

Circuit Court Case No. 2011-CP-42-02079  
Appellate Case No.: 2019-000852

**RECEIVED**  
NOV 04 2019  
SC Court of Appeals

The Revocable Trust Agreement of  
Manning Lee Williams dated October 28, 2015 .....Respondent,

vs.

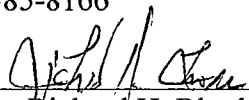
Cynthia Norden and Raymond Norden,.....Appellants.

RESPONDENT'S DESIGNATION OF MATTER

**Pleadings**

- Complaint filed May 10, 2011
- Answer filed June 14, 2011
- Amended Answer and Counterclaim filed November 20, 2014
- Amended Complaint filed January 15, 2015
- Answer to Amended Complaint filed January 28, 2015
- Reply to Counterclaim filed February 16, 2015
  
- Motion for Summary Judgment – filed December 16, 2015
  - Affidavit of Respondents
  - Affidavit of Appellants
  - Exhibits 1 through 14 filed on September 30, 2016
  - Transcript of Hearing October 10, 2016 – pages 3 through 35
  
- Order Granting Summary Judgment filed January 14, 2019
  
- Motion to Reconsider filed January 14, 2019
  
- Order Denying Motion to Reconsider filed April 24, 2019

Burts Turner & Rhodes  
Attorneys for the Respondents  
260 North Church Street  
Spartanburg, SC 29306  
(864) 585-8166

By:   
Richard H. Rhodes

November 1, 2019

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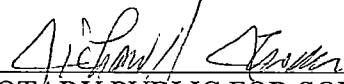
PROOF OF DELIVERY

This is to certify that on the 1<sup>st</sup> day of November, 2019, the undersigned, secretary to  
Richard H. Rhodes, Esq., served a copy of the **RESPONDENT'S DESIGNATION OF  
MATTER** by depositing a copy of the same into the United States Mail, postage pre-paid and in  
the correct amount to the following:

J. Falkner Wilkes, Esquire	N. Douglas Brannon, Esquire
114 Whitsett Street	P.O. Box 3254
Greenville, SC 29601	Spartanburg, SC 29304
Counsel for Appellants	Counsel for Appellants

  
JO ANN CHAMPION

SWORN to before me this 1<sup>st</sup>  
day of November, 2019.

 (SEAL)  
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 12/10/2025

BURTS TURNER & RHODES  
ATTORNEYS AT LAW

SAM BURTS (1907 - 1982)  
NOEL TURNER (1928 - 2011)  
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November 1, 2019

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

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SC Court of Appeals

Re: The Revocable Trust Agreement of Manning Lee Williams dated October 28, 2015 vs.  
Cynthia Norden and Raymond Norden  
Case No. 2011-CP-42-02079  
Appellate Case: 2019-000852

Dear Ms. Kitchings:

I have enclosed an original of the Respondent's Initial Brief and Designation of Matter. I have also enclosed Proof of Service on all counsel.

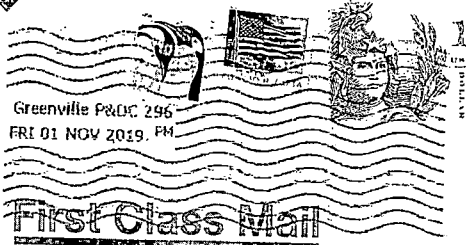
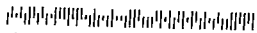
If I need to supply additional information, please let me know.

Sincerely,

  
Richard H. Rhodes

RHR/jc  
Enc.

cc:  
J. Falkner Wilkes, Esquire  
114 Whitsett Street  
Greenville, SC 29601  
Counsel for Appellants  
N. Douglas Brannon, Esquire  
P.O. Box 3254  
Spartanburg, SC 29304  
Counsel for Appellants



Greenville P&DC 296  
FRI 01 NOV 2019 PM

First Class Mail

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TO:  
The Hon. Jenny Abbott Kitchings  
S.C. Court of Appeals  
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