

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ALLENDALE COUNTY  
Court of Common Pleas

The Honorable Lawton McIntosh

Appellate Case No. 2019-000905

RECEIVED  
NOV 14 2019  
SC Court of Appeals

J. Morgan Kears, Personal Representative of the Estate of G.H. Kears,..... Appellant,

v.

The Kears Family Education Trust, William Gordon Kears, Elizabeth Kears Gooding, Julia Kears Sharp, Rachael Kears Best, Joseph Weber Kears, and John Morgan Kears, of which all are named individually and as Trustees of the Kears Family Education Trust U/A/D Nov. 05, 1992..... Respondents.

NOTICE OF APPEARANCE OF KATHLEEN C. BARNES ON BEHALF OF RESPONDENT ELIZABETH KEARSE GOODING, INDIVIDUALLY AND AS TRUSTEE OF THE KEARSE FAMILY EDUCATION TRUST U/A/D NOV. 05, 1992

Kathleen C. Barnes, esquire, hereby enters a Notice of Appearance as appellate co-counsel on behalf of Respondent Elizabeth Kears Gooding, Individually and as Trustee of the Kears Family Education Trust U/A/D Nov. 05, 1992, in the above-captioned matter. Based on the online case records and a conversation with the case handler, it is the undersigned's understanding that the case is held in abeyance pending the motion of Blake A. Hewitt to withdraw as counsel and that the Court will issue an order once the case is no longer held in abeyance with briefing deadlines.

Dated: November 12, 2019

Respectfully submitted,

By: Kathleen C. Barnes  
Kathleen Chewning Barnes, SC Bar No. 78854  
Barnes Law Firm, LLC  
P.O. Box 897  
Hampton, SC 29924  
803-943-4529

*Attorney for Respondent Elizabeth Kears Gooding*

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PROOF OF SERVICE

The undersigned certifies that a copy of *Notice of Appearance of Kathleen C. Barnes on Behalf of Respondent Elizabeth Kears Gooding, Individually and as Trustee of the Kears Family Education Trust U/A/D Nov. 05, 1992*, has been served upon counsel listed below by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 12<sup>th</sup> day of November, 2019.

Kenneth B. Wingate  
Matthew J. Myers  
SWEENEY, WINGATE & BARROW, P.A.  
P.O. Box 12129  
Columbia, SC 29211

Daniel A. Speights  
SPEIGHTS & RUNYAN  
P.O. Box 685  
Hampton, SC 29924

Stephen M. Slotchiver  
SLOTCHIVER & SLOTCHIVER, LLP  
751 Johnnie Dodds Blvd, Ste. 100  
Charleston, SC 29464

William Gordon Kears  
P.O. Box 221  
Fairfax, SC 29827

Rachael Kears Best  
5055 Lakeshore Drive  
Columbia, SC 29206

Joseph Weber Kears  
6620 Merrill Road  
Columbia, SC 29209

John Morgan Kears  
P.O. Box 521  
Allendale, SC 29810

Dated: November 12, 2019

By:

Kathleen C. Barnes

Kathleen Chewing Barnes, SC Bar No. 78854  
P.O. Box 897  
Hampton, SC 29924  
803-943-4529

# BARNES

LAW FIRM | LLC

Kathleen C. Barnes  
Admitted: Georgia | South Carolina

November 12, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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NOV 14 2019

SC Court of Appeals

**Via U.S. Mail**

Re: *J. Morgan Kearsse, Personal Representative of the Estate of G.H. Kearsse v. The Kearsse Family Education Trust, et al.*, Appellate  
Case No. 2019-000905

Dear Mrs. Kitchings:

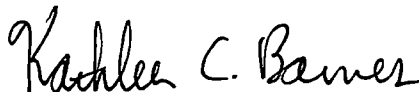
Enclosed for filing please find (1) the original and one copy of *Notice of Appearance of Kathleen C. Barnes on Behalf of Respondent Elizabeth Kearsse Gooding, Individually and as Trustee of the Kearsse Family Education Trust U/A/D Nov. 05, 1992*, in the above-referenced case. Also enclosed is proof of service of the Notice. Please file the documents and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope.

Based on the online case records as of the date of this letter and a conversation with the case handler, it is the undersigned's understanding that the case is held in abeyance pending the motion of Blake A. Hewitt to withdraw as counsel and that the Court will issue an order once the case is no longer held in abeyance with briefing deadlines. If this is incorrect, please let me know.

By copy of this letter, I am serving counsel of record and pro se parties with a copy of the same. If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,

BARNES LAW FIRM, LLC



Kathleen C. Barnes

cc: Kenneth B. Wingate  
Matthew J. Myers  
Daniel A. Speights

Stephen M. Slotchiver  
William Gordon Kears  
Rachael Kears Best  
Joseph Weber Kears  
John Morgan Kears

# BARNES

LAW FIRM I LLC

P.O. Box 897 | 13 Mulberry Street East  
Hampton, SC 29924



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The Honorable Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
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