

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Charles B. Simmons, Jr.

Appellate Case No. 2018-000340

RECEIVED
FEB 24 2020
SC Court of Appeals

Joseph Edward McMullen, Appellant,

v.

Terra Oaks Architectural Committee, Paola Rogers, Dwain Cook and John Simpson as putative members of the Terra Oaks Architectural Committee.....Respondents

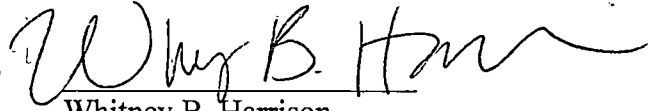
MOTION FOR JUDICIAL NOTICE

Respondents Terra Oaks Architectural Committee, Paola Rogers, Dwain Cook, and John Simpson, as putative members of the Terra Oaks Architectural Committee, request this Court take judicial notice, pursuant to Rule 201, SCRE, of the fact that Appellant Joseph Edward McMullen sold the property located at 9 Fisher Road Greenville, SC 29615 (Map # 050200100300) on November 19, 2019. This request is supported by the property details from the Greenville County Assessor's Office, attached as Exhibit A. This sale occurred after the filing of final briefs and Respondents believe it is proper for this Court to take judicial notice and consider this development in rendering a decision.

Signature Page to Follow

February 24, 2020

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Whitney B. Harrison". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201
(803) 779-0100
(803) 7878-0750 (fax)
wharrison@mcgowanhood.com

EXHIBIT A

REAL PROPERTY DETAILS

Details for Tax Year 2020

Property Tax Estimate

Select Another Tax Year:



[View Map](#)



[View Old Property Card](#)



[Change Mailing Address](#)

GENERAL INFORMATION

Map #: 0540200100300

Tax Year: 2020

District: 200

Owner(s): Bonarrigo Joseph

Previous Owner: McMullen Joseph Edward Revoc

Care Of:

Mailing Address: 9 Fisher Rd Greenville, SC 29615

DESCRIPTION

Acreage: 1.017

Description: A

Location: 9 Fisher Rd

Subdivision: Terra Oaks

Deed Book-Page: 2581 - 1138

Deed Date: 11/19/2019

Will:

Sale Price:

Plat Book-Page: 1321 / 10

CLASSIFICATION

Jurisdiction: 1 (County Jurisdiction)

Homestead Code: No

Assessment Class: OT - Non-Legal Residence

PROPERTY INFORMATION

Bedrooms/Bathrooms: 5 Bedrooms, 4 Bathrooms, 0 Half Bathrooms

Square Footage: 3932

Land Use: 1100 (Single Family)

VALUE

Fair Market Value: 414,160

Taxable Market Value: 414,160

2/5/2020

Real Property Services

Total Rollback:

Taxes: Not Available

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PROOF OF SERVICE

The undersigned certifies that a copy the Motion for Judicial Notice by *Respondents Terra Oaks Architectural Committee, Paola Rogers, Dwain Cook and John Simpson as putative members of the Terra Oaks Architectural Committee*, 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 on February 24, 2020.

Ralph Gleaton
935 South Main Street; Suite 203
Greenville, SC 29601

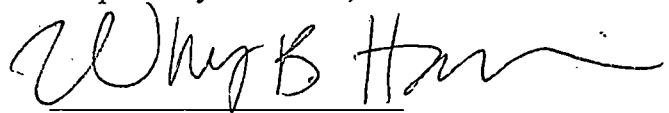
Robert C. Childs, III
Childs Law Firm
2100 Poinsett Hwy.; Suite E
Greenville, SC 29609

J. Faulkner Wilkes
114 Whitsett Street
Greenville, SC 29601

Allison Paige Sullivan
Bluestein Thompson Sullivan, LLC
P.O. Box 7965
Columbia, SC 29202

February 24, 2020

Respectfully submitted,



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Jordan C. Calloway
Susan F. Campbell
Deborah Casey (NC)*
Ashley White Creech
Shawn B. Deery
Chance M. Farr (SC,NC)
Eve S. Goodstein



Whitney B. Harrison
Richard A. "Trey" Jones III
Patrick M. Killen
Anna S. Magann
Robert V. Phillips
Ranee Saunders
James L. Ward, Jr. (SC,NC)
James Stephen Welch (SC,OK)*
Jay F. Wright
Joseph G. Wright, III*
*Of Counsel

writers email: wharrison@mcgowanhood.com

February 24, 2020

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

RE: *Joseph Edward McMullen v. Terra Oaks Architectural Committee, Paola Rogers,
Dwain Cook and John Simpson as putative members of the Terra Oaks
Architectural Committee*
Case No. 2019-000340

Dear Ms. Kitchings,

Enclosed for filing please find Respondents' Motion for Judicial Notice, along with a proof of service and the \$ 50 filing fee. I have also enclosed a copy to be stamped and returned.

Please let me know if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is fluid and cursive, with a long horizontal flourish at the end.

Whitney B. Harrison

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SC Court of Appeals

Enclosure

cc: Robert Clyde Childs, III
J. Falkner Wilkes
Ralph Gleaton
Allison Paige Sullivan