

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Master in Equity

Charles B. Simmons, Jr., Master in Equity

Appellate Case No. 2019-001518

Laurel Grove, LLC.....Respondent,

v.

Frances Lee Farmer Sullivan, Marcus Lynn Farmer, Nelson Eugene Farmer, Peaches Shawn Farmer, John Anthony Pelzer, Thomas Farmer, Tara Smith, the Heirs of Kimberly Bean, L'kita Brown, Margaret Lois Brown, Robert Brown and Willie Brown as officers, directors and/or shareholders of the Holy Temple of God Faith Healing Church, The Estate of Lula Mae Knox, Shirley Miller, Norma Williams, Juanita Smith, Evelyn Byrd, James Brown, Norman Smith, Robert Smith, Catherine Stroble, Sharon Brown, the Greenville County Tax Collector, John Doe representing any and all known and unknown heirs of the following individuals who may claim an interest in the Property: Willie R. Brown a/k/a Willie Ruth Brown a/k/a Willie A. Brown a/k/a Willie Lee Farmer Brown a/k/a Willie Lee Wilson, Robert R. Brown a/k/a Robert Russell Brown a/k/a Robert Russell Roland Brown, Mary Elizabeth Farmer Crudup, Nelson Farmer, Donnie Rae Farmer, Richard Earle Farmer, Nazéae Jefferson aka Zeon Jefferson, Annie Ruth Farmer Pelzer, Willie Rufus Farmer, Kimberly Bean, Lula Mae Knox, Theodore Byrd, Michael Jerome Smith, and as Defendants whose names are unknown claiming any right, title estate, interest in, or lien upon the real estate described in the Complaint herein, any known adults, their heirs and assigns and all other persons, firms or corporations entitle to claim under by or through the above-named Defendants, being as a class designated as Richard Roe, and any unknown infants or persons under disability being a class designated as Jane Doe, Defendants.

Of Whom, Juanita Smith, Evelyn Byrd, Shirley Miller and Sharon Brown are the Appellants.

DESIGNATION OF MATTER

Respondent, pursuant to Rule 209 of the South Carolina Appellate Court Rules, hereby proposes that the following be included in the Record on Appeal:

1. Order – Ownership of Property dated February 22, 2019;
2. Order Establishing Value of Property dated August 9, 2019; and
3. July 29, 2019 Transcript of Record.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



Aimee V. Leary (S.C. Bar #100657)

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Greenville, SC 29601

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864-751-7624

Attorney for Respondent Laurel Grove, LLC

March 9, 2020

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Master in Equity

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MAR 11 2020
SC Court of Appeals

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v.

Frances Lee Farmer Sullivan, Marcus Lynn Farmer, Nelson Eugene Farmer, Peaches Shawn Farmer, John Anthony Pelzer, Thomas Farmer, Tara Smith, the Heirs of Kimberly Bean, L'kita Brown, Margaret Lois Brown, Robert Brown and Willie Brown as officers, directors and/or shareholders of the Holy Temple of God Faith Healing Church, The Estate of Lula Mae Knox, Shirley Miller, Norma Williams, Juanita Smith, Evelyn Byrd, James Brown, Norman Smith, Robert Smith, Catherine Stroble, Sharon Brown, the Greenville County Tax Collector, John Doe representing any and all known and unknown heirs of the following individuals who may claim an interest in the Property: Willie R. Brown a/k/a Willie Ruth Brown a/k/a Willie A. Brown a/k/a Willie Lee Farmer Brown a/k/a Willie Lee Wilson, Robert R. Brown a/k/a Robert Russell Brown a/k/a Robert Russell Roland Brown, Mary Elizabeth Farmer Crudup, Nelson Farmer, Donnie Rae Farmer, Richard Earle Farmer, Nazeae Jefferson aka Zeon Jefferson, Annie Ruth Farmer Pelzer, Willie Rufus Farmer, Kimberly Bean, Lula Mae Knox, Theodore Byrd, Michael Jerome Smith, and as Defendants whose names are unknown claiming any right, title estate, interest in, or lien upon the real estate described in the Complaint herein, any known adults, their heirs and assigns and all other persons, firms or corporations entitle to claim under by or through the above-named Defendants, being as a class designated as Richard Roe, and any unknown infants or persons under disability being a class designated as Jane Doe, Defendants.

Of Whom, Juanita Smith, Evelyn Byrd, Shirley Miller and Sharon Brown are the Appellants.

PROOF OF SERVICE

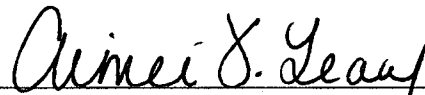
The undersigned hereby certifies that on March 9, 2020, she served Appellants with the Respondent's Initial Brief and Designation of Matter by mailing a copy of the same by U.S. mail with first class postage prepaid to the following addresses:

Sharon Brown
216 Ardmore Road
Spartanburg, SC 29306

Juanita Smith
111 Hanover Place Apt #39
Spartanburg, SC 29306

Evelyn Byrd
232A Norris Ridge Apts.
Spartanburg, SC 29306

Shirley Miller
179 Amos Street
Spartanburg, SC 29306



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March 9, 2020



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MAR 11 2020
SC Court of Appeals

March 9, 2020

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Laurel Grove, LLC vs. Frances Lee Farmer Sullivan, et. al.
Docket Case No. 2018-CP-23-00883
Appellate Case No. 2019-001518

Dear Ms. Kitchings:

Please find enclosed the Respondent's Initial Brief and Designation of Matter along with a Proof of Service. By way of this correspondence, I have served the Appellants with a copy of the same.

Thank you for your attention to this matter,

Very truly yours,

Aimee Victoria-Ann Leary

AVL:jkk
Enclosures

cc: Sharon Brown, Appellant
Juanita Smith, Appellant
Evelyn Byrd, Appellant
Shirley Miller, Appellant

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

03/09/2020
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FIRST CLASS MAIL



Fox Rothschild LLP
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2 West Washington Street, Suite 1100
Greenville, SC 29601

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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