

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas**

Edgar W. Dickson, Circuit Court Judge

**Appellate Case No. 2019-001065
Dorchester County Case No(s). 2019-CP-18-0677 and 2017-CP-18-1816**

In Re: The Estate of Doris Duane Colucci

**Michael C. Fox, Named Personal Representative
in the Last Will of Doris Duane ColucciAppellant,**

v.

**Andrew W. Chandler, in his capacity as Special
Administrator of the Estate of Doris Duane Colucci,
Michael C. Fox, Successor Trustee of the
Colucci Living Trust, dated February 24, 2005,
Michael Fredrick Antonio Colucci, John Martin Antonio,
Henry Burkes, and Richard M. Hyman, Jr.....Respondents.**

**SUPPLEMENT TO RECORD ON APPEAL
(177-A; 960-982)**

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Garrett Law Offices, LLC
1075 E. Montague Ave.
North Charleston, SC 29405
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Attorneys for Appellant

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Attorney for Respondent Andrew W. Chandler

Pleadings

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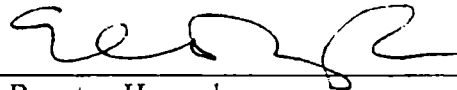
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37. Given that replacing Respondent with Petitioner as Personal Representative will result in unnecessary costs, delay, and inefficiency, and further given that Petitioner is unsuitable to serve as Personal Representative, Respondent respectfully requests that Petitioner's Petition for Appointment be denied.

WHEREFORE, for the reasons set forth above, Respondent Andrew W. Chandler, Esquire, Special Administrator of the Estate of Doris D. Colucci, respectfully objects to the Petition for Appointment and requests that the Court deny the Petition.

ROSEN, ROSEN & HAGOOD, LLC



H. Brewton Hagood
Andrew D. Gowdown
Elizabeth J. Palmer
151 Meeting Street, Suite 400
Charleston, South Carolina 29401
(843) 577-6726

ATTORNEYS FOR RESPONDENT ANDREW W.
CHANDLER, ESQUIRE, SPECIAL ADMINISTRATOR
OF THE ESTATE OF DORIS DUANE COLUCCI

Charleston, South Carolina
November 30, 2017

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

IN THE MATTER OF:
DORIS DUANE COLUCCI
(Decedent)

IN THE PROBATE COURT

MOTION FOR REMOVAL

CASE NUMBER: 2017-ES-18-00294

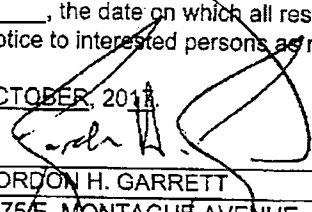
PROBATE COURT
DORCHESTER COUNTY
2017 OCT 30 AM 9:34

A formal proceeding concerning the above matter was commenced on OCTOBER 30, 2017. The undersigned hereby moves for removal of this action to the Circuit Court and asserts that this action is removable because it involves the following:

- Probate of Will
- Appointment of Personal Representative
- Construction of Will
- Title to property in which the Estate of a decedent asserts an interest
- Internal or external matter involving a trust (excluding "special needs trusts")
- Action in which there is a right to trial by jury and in which the amount in controversy is at least \$5,000
- Action concerning gifts under the SC Uniform Gifts to Minors Act

This Motion is made no later than ten (10) days from N/A, 20, the date on which all responsive pleadings were filed. By copy of this Motion, the undersigned is giving notice to interested persons as required by law.

Executed this 27 day of OCTOBER, 2017

Signature: 
 Print Name: GORDON H. GARRETT
 Address: 1075 E. MONTAGUE AVENUE
NORTH CHARLESTON, SC 29405
 Telephone (Work): 843-554-5515
 (Home): 843-554-5515
 (Cell): _____
 Email: GGARETT@GARRETTLAWSC.COM
 Relationship to Decedent/Estate: ATTORNEY FOR MICHAEL C. FOX

ORDER FOR REMOVAL

- It is hereby ORDERED on the Court's own Motion that this action be removed to the Circuit Court.
 - Jurisdiction is retained as to all other matters involving this case.
 - The related matters of _____ are also removed to serve the best interest of the Estate and/or the interest of judicial economy.
- The Motion for Removal is hereby GRANTED. This action shall be removed to the Circuit Court.
 - Jurisdiction is retained as to all other matters involving this case, *except for issues previously or subsequently removed.*
 - The related matters of _____ are also removed to serve the best interest of the Estate and/or the interest of judicial economy.
- It is hereby ORDERED that the Motion for Removal is DENIED because _____.

Executed this 20th day of Nov, 2017.

Mary Blunt

_____, Probate Court Judge

PROBATE JUDGE
DORCHESTER COUNTY
2017 NOV 20 PM 3:56

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Probate Court

Mary L. Blunt, Probate Court Judge

Dorchester County Circuit Court Case No.: 2019-CP-10-0677
Dorchester County Probate Court Case No.: 2017-ES-18-00294

Michael C. Fox as Personal Representative
of the Estate of Doris Duane Colucci,Appellant,

v.

Andrew W. Chandler, Esquire, in his capacity as Temporary Special Administrator
Of the Estate of Doris Duane Colucci, Michael C. Fox, Trustee of the Colucci
Living Trust, Ivo Francesco Colucci, Michael Frederick Antonio Colucci,
John Martin Antonio Colucci, Henry Burkes,
and Richard M. Hyman, Jr., Esquire,..... Respondents.

**RESPONDENT ANDREW W. CHANDLER’S OPPOSITION TO APPELLANT’S
EMERGENCY PETITION FOR WRIT OF SUPERSEDEAS**

This matter is before the Court on Appellant Fox’s Emergency Petition for Writ of Supersedeas. Because a supersedeas is not necessary to preserve jurisdiction of the appeal or to prevent a contested issue from becoming moot and, further, because granting the Petition would result in harm to the Estate and jeopardize settlements that have been negotiated by, and consented to by, all interested parties, the Petition must be denied.

I. A supersedeas is not necessary to preserve jurisdiction of the appeal because appellate jurisdiction does not exist given that the orders appealed from are, for one reason or the other, not appealable.

When an order is interlocutory or otherwise not immediately appealable, the service and filing of a notice of appeal does not transfer jurisdiction to the appellate court, nor does it stay the proceedings in the trial court. S.C. Pub. Svc. Auth. v. Arnold, 287 S.C. 584, 586, 340 S.E.2d 535, 536 (1986); Dibble v. Schade, 308 S.C. 88, 93, 417 S.E.2d 104, 107 (1992); Brown v. Greenwood Sch. Dist. 50 Bd. of Trustees, 344 S.C. 522, 524-25, 544 S.E.2d 642, 643 (2001).

The orders of the probate court from which Appellant purports to appeal are not appealable for the reasons set forth in Respondent Chandler's Motion to Dismiss Appeal (which is incorporated herein). As such, this Court, sitting as the appellate court, cannot obtain subject matter jurisdiction over those appeals. See Brown, 344 S.C. at 524, 544 S.E.2d 643 (issues relating to subject matter jurisdiction may be raised at any time and should be taken notice of by the court on its own motion). Therefore, a supersedeas is neither appropriate nor is it necessary to preserve jurisdiction given that jurisdiction does not exist in the first instance.

II. A supersedeas is not necessary to keep any contested issues from becoming moot.

Appellant argues that, absent a supersedeas, the pending wrongful death and "Slayer Action" lawsuits will be "settled without knowledge or approval by the Personal Representative o[r] the Trustee of the Colucci Living Trust." Appellant submits that the proposed settlements have been submitted to the probate court¹ for its approval, and that the settlements "resolve title to some jointly owned real estate but not others."

¹ Only the proposed settlement of the Slayer Action has been submitted to the probate court. The settlement of the wrongful death lawsuit must be submitted to the Charleston County Court of Common Pleas, where it is pending, to obtain approval pursuant to S.C. Code Ann. § 15-51-42. This has been put on hold due to Appellant's appeals and the motion Appellant filed, despite being restrained, seeking to have himself substituted as the plaintiff in that action.

First, Appellant's approval is not required for the settlement of either of these lawsuits. Additionally, Appellant has been and will be given notice of the proposed terms of both those settlements² as evidenced by his objections to the same. He will have the opportunity to be heard and voice any objections he has to the settlement of the Slayer Action. Likewise, as long as he remains Personal Representative, he will also be given notice of any hearing on the settlement of the wrongful death lawsuit, and therefore given the opportunity to be heard on that as well. Importantly, the statutory beneficiaries, i.e., the sons of the Decedent, are in favor of the settlement proposed in the wrongful death action and wish for it to go forward without further delay. Likewise, the beneficiaries of the Colucci Living Trust, the sole devisee of the Estate, are in favor of the settlement proposed in the Slayer Action and wish for it to go forward without further delay. In other words, despite the wishes of those interested in the settlements (i.e., almost the entire Colucci family), Appellant persists in attempting to derail and frustrate those settlements.

Second, Appellant expresses concern that the settlements "resolve title to some jointly owned real estate but not others." Appellant's affidavit clarifies that he is referring to the marital residence, located at 400 Murray Blvd., Summerville, SC. However, there is no "contested issue" as to title of that property and therefore no need for a supersedeas. The Decedent and her husband, Ivo Colucci, owned that property as tenants in common. In 2016, Mr. Colucci executed a deed, conveying his 50% interest in the property to his children, and retaining for himself a life interest. See 2016 Deed, attached as Exhibit 1. Following her death, the Decedent's 50% interest in that property was conveyed to the Trust (of which Appellant is Trustee), the sole devisee of

² That Appellant has knowledge of the terms of the proposed settlement of the Slayer Action is evidenced by the fact that he attached the Petition submitted to the probate court to his Petition. So long as he remains Personal Representative of the Estate, he will receive a copy of the petition to be filed in the circuit court concerning the settlement of the wrongful death lawsuit as he has filed a notice of appearance in that action.

the Will. See 2018 Deed to Trust, attached as Exhibit 2 (the recitals in this deed establish that the property was owned as tenants in common). The absence of any controversy as to the title of this property renders a supersedeas unnecessary.

Third, Appellant argues that the “Edisto House” is property that belongs to the Trust and that a supersedeas is necessary to prevent its sale. This is also factually incorrect. At the time of Decedent’s death, the Edisto House was titled in the names of the Decedent and her husband, Ivo Colucci, as joint tenants with rights of survivorship. See Edisto House deed, attached as Exhibit 3. Upon Decedent’s death, Ivo Colucci became the sole owner by operation of law. It should be noted that ownership of the Edisto House was negotiated and made part of the settlement of the Slayer Action because the Slayer Act provides that “[a]ny joint tenant who feloniously and intentionally kills another joint tenant thereby effects a severance of the interest of the decedent so that the share of the decedent passes as the decedent’s property and the killer has no rights by survivorship.” S.C. Code Ann. § 62-2-803(b). As such, had Respondent prevailed at the trial of the Slayer Action, the joint tenancy of the Edisto House would have been severed, with the Decedent being deemed to be an owner of a 50% interest which would have passed to the Estate. Appellant’s argument that the Trust currently owns the Edisto House is simply incorrect.

III. Respondent Chandler’s Motion to Lift Stay was procedurally and substantively proper.

Appellant argues that Respondent Chandler’s Motion to Lift Stay, made to the probate court, was fatally defective in that it did not comply with the requirements of Rule 241(d)(3) and (4). It is unclear how this, even if true, would come to bear on Appellant’s current Petition before this Court seeking a writ of supersedeas (as opposed to seeking a review of the probate court’s order lifting the stay). Regardless, this argument also fails as the procedure and requirements set forth in those subsections apply to the filing of a petition “[a]fter the lower court or

administrative tribunal has ruled” (Rule 241(d)(2)) on “an application for an order lifting stay” (Rule 241(d)(1) made to the lower court. The rule’s distinction between an “application”, when referring to a party seeking relief from the lower court, and a “petition”, when referring to a party seeking relief from the appellate court after the lower court has ruled, is instructive and the requirements set forth in Rule 241(d)(3) and (4) apply only to a petition.³ As such, Respondent Chandler’s Motion to Lift Stay, made to the probate court, was proper.

CONCLUSION

Petitioner Fox has not established that a writ of supersedeas is necessary or proper. Furthermore, imposing such a writ would likely result in additional delay and cost to the Estate. Respondent Chandler respectfully requests that the Petition be denied.

ROSEN HAGOOD, LLC

s/ Elizabeth J. Palmer
Elizabeth J. Palmer
151 Meeting Street, Suite 400
Charleston, South Carolina 29401
(843) 577-6726

ATTORNEYS FOR RESPONDENT ANDREW W.
CHANDLER, ESQUIRE, TEMPORARY SPECIAL
ADMINISTRATOR OF THE ESTATE OF DORIS
DUANE COLUCCI

Charleston, South Carolina
May 22, 2019

³ Review of the requirements for *petitions* under Rule 241 makes it clear that they are inapplicable to *applications* made to the lower court, such as Respondent Chandler’s Motion to Stay. For example, Rule 241(d)(3) requires that a certified copy of the order of the lower court be filed with a petition. It would be nonsensical to require a party to file a certified copy of the lower court’s order upon submission of an application *to the lower court*. Likewise, Rule 241(d)(4)(C) requires a petition to contain “a showing that an application for this relief was made to the lower court” which again distinguishes between the two pleadings.

1976, in Book 275, at Page 207, in the RMC Office for Dorchester County, South Carolina.

ALSO:

ALL that piece, parcel or tract of land, situate, lying and being in Farmdale Subdivision, near the Town of Summerville, in the County of Dorchester and State of South Carolina, said tract containing 1.11 acres; and having such shape, form, marks, courses, distances, buttings, boundings and content, and being more particularly delineated as "Tract F" on a "Plat of a Tract of Land being a portion of Farmdale S/D, surveyed for Limehouse & Co." from a survey made on January 16, 1978, by H. P. Tompkins, Jr., R.L.S., and recorded in the RMC Office for Dorchester County at Plat Book 25, Page 85

ALSO:

ALL that piece, parcel or tract of land, situate, lying and being in Farmdale Subdivision, near the Town of Summerville, in the County of Dorchester and State of South Carolina, said tract containing 2.89 acres, and having such shape, form, marks, courses, distances, buttings, boundings and content, and being more particularly delineated as "Tract F-1" on a "Plat of a Tract of Land Being a Portion of Farmdale S/D, surveyed for Limehouse & Co." from a survey made on January 16, 1978, by H. P. Tompkins, Jr., R.L.S., and recorded in the RMC Office for Dorchester County at Plat Book 25, Page 85.

Being the same two (2) tracts of land conveyed to Ivo Colucci and Doris Colucci by deed of T. C. Limehouse dated February 6, 1978 and recorded February 8, 1976, in Book 334, Page 325 in the RMC Office for Dorchester County, South Carolina.

TMS # 152-00-00-028.000

Grantee's Address/Property Address: 400 Murray Blvd., Summerville, SC 29483

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

TO HAVE AND TO HOLD, all and singular the premises before mentioned unto the said IVO COLUCCI, a/k/a VIO F. COLUCCI, reserving and retaining a life estate for and during the term of my natural life, with the remainder in fee simple to STEFAN

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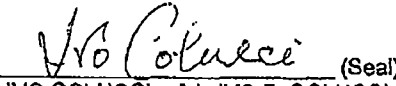
COLUCCI, ALICE C. NORTON, KIM COLUCCI LIZZI, WILLIAM COLUCCI, and ROBERT COLUCCI, their heirs and assigns forever

AND I do hereby bind myself and my heirs, Executors and Administrators, to warrant and forever defend, all and singular, the said Premises unto the said IVO COLUCCI, a/k/a IVO F. COLUCCI, reserving and retaining a life estate for and during the term of my natural life, with the remainder in fee simple to STEFAN COLUCCI, ALICE C. NORTON, KIM COLUCCI LIZZI, WILLIAM COLUCCI, and ROBERT COLUCCI, their heirs and assigns, against me and my heirs, and all persons whomsoever lawfully claiming or to claim the same or any part thereof.

IN WITNESS WHEREOF, we have hereunto set our Hands and Seals this 26th day of May 2016.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:


Marilyn G. Moore

 (Seal)
IVO COLUCCI, a/k/a IVO F. COLUCCI

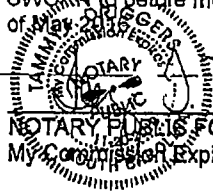
FILED/RECORDED
MAY 21, 2016
DORCHESTER COUNTY
REGISTER OF DEEDS

STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY)

ACKNOWLEDGMENT

THE FOREGOING instrument was acknowledged before me by IVO COLUCCI,
a/k/a IVO F. COLUCCI, on the day and year first above written.

SWORN to before me 26th day
of May, 2019

 TAMIKA S. GIGERS
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 11/2019


Witness (Seal)

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STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY) AFFIDAVIT

PERSONALLY appeared before the undersigned, who being duly sworn, deposes and says as follows:

1. I have read the information on this Affidavit and I understand such information.
2. The property being transferred is located at 400 Murray Blvd, Summerville, South Carolina 29483, bearing Dorchester County Tax Map Number 152-00-00-026,000, was transferred by Ivo Colucci, a/k/a Ivo F. Colucci to Ivo Colucci, a/k/a Ivo F. Colucci, reserving a life estate with the remainder in fee to Stefan Colucci, et al, on May 28, 2018.
3. Check one of the following: The Deed is:
 - (a) subject to the deed recording fee as a transfer for consideration paid or to be paid in money's worth.
 - (b) subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
 - (c) XX EXEMPT from the deed recording fee because: Exemption #4. Explanation: Grantor retaining property in a life estate (If exempt, please skip items 4-7, and go to item 8 of this Affidavit)
4. Check one of the following if either item 3(a) or item 3(b) above has been checked:
 - (a) The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$_____.
 - (b) The fee is computed on the fair market value of the realty which is \$_____.
 - (c) The fee is computed on the fair market value of the realty as established for property tax purposes which is \$_____.
5. Check Yes or No to the following: A lien or encumbrance exists on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "Yes", the amount of the outstanding balance of this lien or encumbrance is: \$_____.
6. The deed recording fee is computed as follows.
 - (a) _____ the amount listed in item 4.
 - (b) _____ the amount listed in item 5. (if no amount, place zero)
 - (c) _____ subtract Line 6(b) from Line 6(a) and place result.
7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with this transaction as Grantor.
8. Check if Property other than Real Property is being transferred on this Deed.
 - (a) Mobile Home
 - (b) Other
9. DEED OF DISTRIBUTION-ATTORNEY'S AFFIDAVIT: Estate of _____, Deceased, CASE NUMBER _____. Personally appeared before me the undersigned attorney who, being duly sworn, certified that (s)he is licensed to practice law in the State of South Carolina; that (s)he has prepared the Deed of Distribution for the Personal Representative in the Estate of _____, Deceased, and that the Grantee(s) therein are correct and conform to the estate filed for the above named Decedent.
10. I understand that a person required to furnish this Affidavit who wilfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

SWORN to before me this 28th day of May, 2018.

[Signature]
NOTARY PUBLIC
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 12/31/19

SIGNED: Ivo Colucci
IVO COLUCCI, a/k/a IVO F. COLUCCI, Grantor

MARGARET L BAILEY
DORCHESTER COUNTY
REGISTER OF DEEDS

201 Johnston Street ~ Saint George, SC 29477 (843) 563-0181

*** THIS PAGE IS PART OF THE INSTRUMENT - DO NOT REMOVE ***

*** ELECTRONICALLY RECORDED DOCUMENT ***

Instrument #:	2018027634	
Receipt Number:	54873	Return To:
Recorded As:	EREC-DEED	
Recorded On:	November 06, 2018	
Recorded At:	08:31:00 AM	Received From: SIMPLIFILE
Recorded By:	KU	Parties:
Book/Page:	RB 11619: 238 - 244	Direct- COLUCCI, DORIS DUANE
Total Pages:	7	Indirect- COLUCCI LIVING TRUST

*** EXAMINED AND CHARGED AS FOLLOWS ***

Recording Fee:	\$12.00	RECEIVED 2018 NOV -28 AM 11:41 DORCHESTER CO ASSESSORS OFFICE
Exempt Tax Charge:	\$0.00	RECEIVED 28th Day of NOVEMBER 2018 JAMES MESSERVY, JR Auditor Dorchester County SC



Margaret Bailey

Margaret Bailey - Register of Deeds



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Bulst, Byars & Taylor, LLC
652 Coleman Blvd.
Suite 200
Mt. Pleasant, SC 29464
4060.DOCX

STATE OF SOUTH CAROLINA)	IN THE PROBATE COURT
)	
COUNTY OF DORCHESTER)	DEED OF DISTRIBUTION
)	(Title not Examined)
IN THE MATTER OF THE ESTATE OF)	
DORIS DUANE COLUCCI)	CASE NUMBER: 2017-ES-1800294
)	
)	

WHEREAS, Doris Duane Colucci (the "Decedent") died on April 14, 2017, a resident of Dorchester County, South Carolina; and

WHEREAS, pursuant to that certain Deed dated February 20, 1976, and recorded on February 23, 1976, in Book 275, at Page 207, in the RMC Office for Dorchester County, South Carolina (the "First Vesting Deed"), Lois M. Truesdale, as Grantor, transferred to the Decedent's spouse, Ivo Colucci, and the Decedent, as Grantees, all of Lois M. Truesdale's interest in 6.47 acres of the real property more particularly described in said First Vesting Deed ("Tract A"); and

WHEREAS, pursuant to that certain Deed dated February 6, 1978, and recorded on February 8, 1978, in Book 334, at Page 325, in the Records of the Clerk of Court for Dorchester County, South Carolina (the "Second Vesting Deed"), T. C. Limehouse, as Grantor, transferred to the Decedent's spouse, Ivo Colucci, and the Decedent, as Grantees, all of T. C. Limehouse's interest in two parcels of real property, one containing 1.11 acres of real property more particularly described in said Second Vesting Deed ("Tract B"), and the other containing 2.89 acres of real property more particularly described in said Second Vesting Deed ("Tract C"); and

WHEREAS, pursuant to that certain Deed dated May 25, 1978, and recorded on May 26, 1978, in Book 345, at Page 115, in the Records of the Clerk of Court for Dorchester County, South Carolina (the "Third Vesting Deed"), G. Burger Smith f/k/a Etta G. Burger ("Etta G. Burger Smith"), as Grantor, transferred to the Decedent's spouse, Ivo Colucci, and the Decedent, as Grantees, all of Etta G. Burger Smith's interest in 3.00 acres of real property more particularly described in said Third Vesting Deed ("Tract D"); and

WHEREAS, pursuant to that certain Deed dated June 22, 1978, and recorded on June 26, 1978, in Book 348, at Page 1, in the RMC Office for Dorchester County, South Carolina (the "Deed Out"), the Decedent's spouse, Ivo Colucci, and the Decedent, as Grantors, transferred to Lawrence S. Lang and Carolyn K. Lang, as Grantees, all of the Decedent's spouse's, Ivo Colucci's, and the Decedent's interest in 0.656 acres of real property more particularly described in said Deed Out; and

WHEREAS, Tract A, Tract B, Tract C, and Tract D, collectively, saving and excepting therefrom that certain 0.656 acre parcel conveyed pursuant to the Deed Out, are commonly referred to as 400 Murray Blvd., Summerville, SC, 29483, bearing Dorchester County TMS# 152-00-00-026-000-C, and which real property is more particularly described in in Exhibit A, attached hereto and incorporated herein by reference (the "Property"); and

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WHEREAS, no survivorship language was included in First Vesting Deed, the Second Vesting Deed, or the Third Vesting Deed, indicating that the Decedent and the Decedent's Spouse owned the Property tenants in common; and

WHEREAS, the Estate of Doris Duane Colucci (the "Estate") is being administered in the Probate Court for Dorchester County, South Carolina, in Case Number 2017-ES-1800294; and

WHEREAS, pursuant to Section 2 of Article Three of the Last Will and Testament of the Decedent, dated June 18, 2013 (the "Will"), the Decedent directed that the residue of the Decedent's Estate, including the Property, be distributed to the then-acting Trustee(s) of the Colucci Living Trust dated February 24, 2005, and any amendments or restatements thereto (the "Trust"); and

WHEREAS, Michael C. Fox is the currently serving Trustee of the Trust; and

WHEREAS, Andrew W. Chandler, Esquire, as Special Administrator of the Estate, is the duly appointed and qualified fiduciary in this matter, as of his appointment on July 10, 2017, by Certificate of Appointment, whose continued appointment was confirmed by Modified Order for the Appointment of a Special Administrator dated August 27, 2018; and

NOW, THEREFORE, in accordance with the laws of the State of South Carolina, the Special Administrator does hereby release all of the Special Administrator's right, title, and interest, including statutory and testamentary powers, over the Property described herein, and the Special Administrator has granted, bargained, sold, and released, and by these Presents does grant, bargain, sell, and release, to the beneficiary named below:

Name: Michael C. Fox, Trustee of the Colucci Living Trust dated February 24, 2005, and any amendments or restatements thereto

Address: 4621 Durant Avenue
North Charleston, SC 29405

All of the Decedent's right, title, and interest in and to the following described property, to-wit:

SEE **EXHIBIT E**, ATTACHED HERETO AND INCORPORATED HEREIN BY REFERENCE FOR A FULL AND COMPLETE LEGAL DESCRIPTION OF THE PROPERTY BEING CONVEYED (THE "PROPERTY" OR "PREMISES")

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

TO HAVE AND TO HOLD, all and singular, the said Premises/Property unto the said Michael C. Fox, Trustee of the Colucci Living Trust dated February 24, 2005, and any amendments or restatements thereto, its successors and assigns forever.

EXHIBIT A

All that lot, piece or parcel of land; with the buildings and improvements thereon; situate, lying and being in Dorchester County, State of South Carolina, and measuring and containing Six and Forty-Seven One-Hundredths (6.47) Acres; Butting, Bounding and Measuring as follows, to wit: North, on lands now or formerly of Robert I. Limehouse, Five Hundred Fifty-Six (556) Feet; East, on lands now or formerly of Daisey A. Murray, Five Hundred Eight and Fifty One-Hundredths (508.50) Feet; South, on lands of Robert I. Limehouse, Five Hundred Eighteen and Fifty One-Hundredths (518.50) Feet; West, on lands of Daisey A. Murray, Five Hundred Thirty-Seven and Five-Tenths (537.5) Feet, and shown on a plat of the same by W. Michael Lines, dated, February 20th, 1976, recorded February 23, 1976 in Plat Book 23, Page 1, in the Records of the Clerk of Court for Dorchester County, South Carolina.

Being the same property conveyed to Doris Duane Colucci, the Decedent, by Lois M. Truesdale by Deed dated February 20, 1976, and recorded on February 23, 1976, in Book 275, at Page 207, in the RMC Office for Dorchester County.

ALSO:

All those certain Pieces, Parcels or Tracts of Land; Situate, Lying and Being in Farmdale Subdivision, near the Town of Summerville, in the County of Dorchester and State of South Carolina, known and designated as "TRACT F" containing 1.11 Acres, more or less, and "TRACT F-1" containing 2.89 Acres, more or less, and shown on that certain plat entitled "Plat of a Tract of Land Being a Portion of Farmdale S/D, surveyed for Limehouse & Co." made on January 16, 1978, by H. P. Tompkins, Jr., R. L. S., a white print copy of said plat being attached as an Exhibit to that certain deed recorded on February 8, 1978, in Book 334, at Page 325 in the Records of the Clerk of Court for Dorchester County, and thereafter recorded in Plat Book 25, Page 85, in the Records of the Records of the Clerk of Court for Dorchester County, South Carolina. Said tracts having such shape, form, marks, courses, distances, buttings, boundings and content as are delineated on said plat, reference to which is hereby made for a more complete description.

SAVING AND EXCEPTING THEREFROM that certain real property conveyed to Lawrence S. Lang and Carolyn K. Lang in that certain deed from Ivo Colucci and Doris Colucci dated June 22, 1978, and recorded June 26, 1978, in Book 348, Page 001, in the Records of the Clerk of Court for Dorchester County, and more particularly described as follows: All that Piece, Parcel or Lot of Land; Situate, Lying and Being on Murray Boulevard, in the County of Dorchester, and State aforesaid; Butting, Bounding and Measuring, as follows, to wit: North, on lands of various owners, One Hundred Nine-Five and Ninety-Eight One Hundredths (195.98) Feet; East, on other lands of the said Lawrence S. Lang, One Hundred Forty-Five and Seventy-Five One Hundredths (145.75) Feet; South, on Murray Boulevard, One Hundred Ninety-Five and Ninety-Eight One Hundredths (195.98) Feet; and West, on other lands of the said Ivo Colucci and Doris D. Colucci, One Hundred Forty-Five and Seventy-Five One Hundredths (145.75) Feet; and having such shape, form, marks, courses, distances, buttings, boundings and content, and being more particularly delineated on a Plat of a tract of land at Farmdale Subdivision, containing 0.656 Acres, the property of Ivo Colucci, about to be conveyed to Lawrence S. Lang, by James F. Bennett, from a survey made March 1978.

Being a portion of the land conveyed to Doris Duane Colucci, the Decedent, by T. C. Limehouse by Deed dated February 6, 1978, and recorded on February 8, 1978, in Book 334, at Page 325, in the Records of the Clerk of Court for Dorchester County, South Carolina.

ALSO:

All that Piece, Parcel or Tract of Land; Situate, Lying and Being in Summerville Farms, near the Town of Summerville, in the County of Dorchester and State aforesaid; Butting, Bounding and Measuring, as follows, to wit: North, generally, on Limehouse Est., Two Hundred Ten (210) Feet; East, generally, on lands now or formerly, E. R. (Burger) Smith, Four Hundred One and Thirteen One Hundredths (401.13) Feet and One Hundred Seventy-Seven (177) Feet, respectively; South, generally, on lands now or formerly Murray, Two Hundred Sixty-Three (263) Feet; and West, generally, on lands of Ivo Colucci, Five Hundred Seven (507) Feet; said tract containing 3.00 Acres, and being more particularly delineated on a Plat by W. Michael Lines, R. L. S., from a survey made in April, 1978.

Being the same property conveyed to Doris Duane Colucci, the Decedent, by Etta G. Burger Smith by Deed dated May 25, 1978, and recorded on May 26, 1978, in Book 345, at Page 115, in the Records of the Clerk of Court for Dorchester County, South Carolina.

All parcels above-described bearing TMS NUMBER: 152-00-00-026-000-C

ELECTRONICALLY FILED - 2019 May 22 3:44 PM - DORCHESTER - COMMON PLEAS - CASE#2019CP1800677

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

AFFIDAVIT

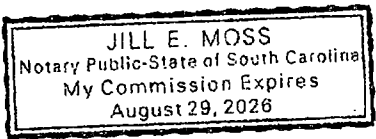
PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this Affidavit and I understand such information.
2. The property known as 400 Murray Blvd., Summerville, SC, 29483, bearing Dorchester County TMS# 152-00-00-026-000-C is being transferred BY The Estate of Doris Duane Colucci TO Michael C. Fox, Trustee of the Colucci Living Trust dated February 24, 2005, and any amendments or restatements thereto ON the 2nd day of November, 2018.
3. Check one of the following: **The DEED is**
 - (a) ___ subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) ___ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as distribution to a trust beneficiary.
 - (c) X EXEMPT from the deed recording fee because: exemption #1
(Explanation If required) (If exempt, please skip items 4-6, and go to item 7 of this affidavit.)
4. Check one of the following if either item 3(a) or item 3(b) above has been checked.
 - (a) ___ The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$
 - (b) ___ The fee is computed on the fair market value of the realty which is \$.
 - (c) ___ The fee is computed on the fair market value of the realty as established for property tax purposes.
5. Check YES___ or NO___ to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If YES, the amount of the outstanding balance of this lien or encumbrance is \$.
6. The DEED Recording Fee is computed as follows:
 - (a) ___ the amount listed in item 4 above
 - (b) ___ -0- the amount listed in item 5 above (no amount place zero)
 - (c) ___ Subtract Line 6(b) from Line 6(a) and place the result.
7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Legal Representative of Estate of Doris Duane Colucci.
8. Check if Property other than Real Property is being transferred on this Deed. (a)___ Mobile Home (b)___ Other
9. X DEED OF DISTRIBUTION - ATTORNEY'S AFFIDAVIT: The Estate of Doris Duane Colucci, deceased, CASE NUMBER 2017-ES-1800294. Personally appeared before me the undersigned attorney who, being duly sworn, certified that she is licensed to practice law in the State of South Carolina; that he has prepared the Deed of Distribution for the Personal Rep. in The Estate of Doris Duane Colucci, deceased and that the grantee(s) therein are correct and conform to the estate file for the above named decedent.
10. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

Morgan M. Insley
Morgan M. Insley, Legal Representative
Buist, Byars & Taylor, LLC

Sworn to before me this 19th day of October, 2018.

Jill E. Moss
Notary Public for South Carolina
My Commission Expires:
{01187742.DOCX 2}



Instrument 2019-0325037 OR Volume Page 1919 1

TMS 361-00-00-003
DATE 4-4-2011
THOMAS W. HILL B/C
ASSESSOR COLLETON COUNTY

ORIGINAL

2011-3042
STATE OF SOUTH CAROLINA)
COUNTY OF COLLETON)

TITLE TO REAL ESTATE
(GENERAL WARRANTY DEED)

KNOW ALL MEN BY THESE PRESENTS, That we, **MARK E. BENSON AND SANDRA K. BENSON**, in the State aforesaid, for and in consideration of the sum of **THREE HUNDRED TWENTY FIVE THOUSAND AND 00/100 (\$325,000.00) DOLLARS** to us in hand paid by **IVO F. COLUCCI AND DORIS D. COLUCCI**, the receipt of which is hereby acknowledged, have granted, bargained, sold and released, and by these presents do grant, bargain, sell and release, subject to the easements, restrictions, reservations and conditions ("Exceptions") set forth below, unto the said **IVO F. COLUCCI AND DORIS D. COLUCCI**, AS **JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP, AND NOT AS TENANTS IN COMMON**, subject to the below-stated Exceptions, their Heirs and Assigns forever, the following described real property:

THIS CONVEYANCE IS MADE SUBJECT TO: All covenants, restrictions, easements and rights-of-ways affecting the property and to all governmental statutes, ordinances, rules and regulations.

All that piece, parcel or lot of land situate, lying and being on Cowpens Point, Island of Edisto, County of Colleton, State of South Carolina, and being known and designated as Lot 3 on a plat by Robert L. Frank, R.L.S. dated 10 October 1982 and recorded in the R.M.C. Office for Charleston County in Plat Book AW at Page 126 and said lot being bounded, now or formerly, as follows: On the North by Frampton Inlet Creek; on the East by Lot 4 as shown on the above-referred to plat; on the South by a lot of Associated Investments of Edisto Island, Inc.; and on the West by Lot 2 as shown on the above-referred to plat.

ALSO, All that certain piece, parcel or lot of land situate, lying and being on Edisto Island in the County of Colleton, State of South Carolina, being shown and designated as Area 3A containing 598 sq. ft. on a plat prepared by Kennerty Surveying, Inc. entitled "PLAT OF LEGARE ROAD AND ADJACENT PARCELS, COWPENS ISLAND, EDISTO ISLAND, COLLETON COUNTY, SOUTH

PROBATE JUDGE
DORCHESTER COUNTY
2011 MAY -3 PM 4:32



CAROLINA" dated October 10, 2002, and recorded in the Office of the Register of Deeds for Colleton County in Plat Slide 708 at Page 8, said lot having such size, shape, dimensions, buttings and boundings as by reference to said plat will more fully and at large appear. Area 3A is made a part and parcel of the adjacent Lot 3 as shown on the referred-to plat and may not be subdivided from said Lot 3.

Said Lot 3 and the addition of Area 3A are also shown as Lot 3 on a plat prepared by Kennerty Surveying Inc. entitled "BOUNDARY SURVEY OF TMS 381-00-00-003 LOT 3 COWPENS ROAD LOCATED IN EDISTO ISLAND, COLLETON COUNTY, SOUTH CAROLINA," said plat being dated June 5, 2008, and recorded in the Office of the Register of Deeds for Colleton County in Plat Slide 793 at Page 7.

Being the same property conveyed to Mark E. Benson and Sandra K. Benson by deed of Associated Investments of Edisto Island, Inc. dated April 14, 2000 and recorded in the Office of the Register of Deeds for Colleton County in Deed Book 1008 at Page 213 and by Quit-Claim Deed from Fraternal Properties, Inc. and Cowpens Subdivision Property Owners Association, Inc. date February 14, 2003, and recorded in said ROD Office in Deed Book 1008 at Page 213.

TMS No. 381-00-00-003

**GRANTEE'S ADDRESS: 400 Murray Blvd.
Summerville, SC 29483**

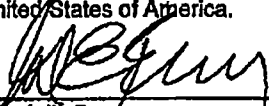
TOGETHER with, subject to the above Exceptions, all and singular, the rights, members, hereditaments and appurtenances to the said premises belonging or in anywise incident or appertaining.

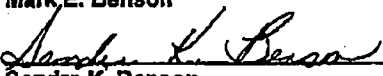
TO HAVE AND TO HOLD, subject to the above Exceptions, all and singular the premises before mentioned unto the said IVO F. COLUCCI AND DORIS D. COLUCCI, AS JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP, AND NOT AS TENANTS IN COMMON, their Heirs and Assigns forever.

And we do hereby bind ourselves and our Heirs, Personal Representatives and Assigns, to warrant and forever defend all and singular the


said premises, subject to the above Exceptions, unto the said IVO F. COLUCCI AND DORIS D. COLUCCI, AS JOINT TENANTS WITH RIGHTS OF SURVIVORSHIP, AND NOT AS TENANTS IN COMMON, their Heirs and Assigns, against ourselves and our Heirs and against every person whomsoever lawfully claiming, or to claim, the same or any part thereof.

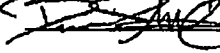
WITNESS our Hands and Seals this 14th day of March in the year of our Lord 2011 and in the two hundredth and thirty-fifth year of the Sovereignty and Independence of the United States of America.



Mark E. Benson


Sandra K. Benson

Signed, Sealed and Delivered
in the Presence of:


(Witness # 1)


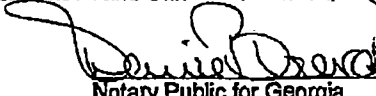
(Witness # 2)

201100025037
Filed for Record in
COLLETON COUNTY SC
KARLA DADDIECO, REGISTER OF DEEDS
03-18-2011 At 02:32 pm.
DEED 1212.50
OR Volume 1919 Page 1 - 4
201100025037
BARR UNGER & MCINTOSH, L L C
ATTORNEYS AT LAW
806 OYSTER PARK STE B
EDISTO ISLAND SC 29438

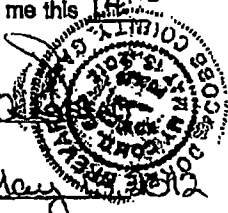
STATE OF GEORGIA
COUNTY OF DeKalb }

ACKNOWLEDGMENT

The foregoing instrument was acknowledged before me this 14th day of March, 2011, by Mark E. Benson and Sandra K. Benson.



Notary Public for Georgia
My Commission Expires: May 2012



Return recorded document to:
Barr, Unger and McIntosh, L.L.C.
806 Oyster Park, Suite B
Edisto Island, SC 29438

ELECTRONICALLY FILED - 2019 May 22 3:44 PM - DORCHESTER - COMMON PLEAS - CASE#2019CP1800677

STATE OF SOUTH CAROLINA)
COUNTY OF COLLETON)

AFFIDAVIT

Date of Transfer of Title:
March 16, 2011

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this Affidavit and I understand such information.
2. The property is being transferred by **MARK E. BENSON AND SANDRA K. BENSON** to **IVO F. COLUCCI AND DORIS D. COLUCCI** on **March 16, 2011**.
3. Check one of the following: **The DEED is**
 (a) subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 (b) _____ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or a transfer to a trust or as a distribution to a trust beneficiary.
 (c) _____ EXEMPT from the deed recording fee because (Exemption # _____) (If exempt, please skip items 4-6, and go to item 7 of this affidavit.)
4. Check one of the following if either 3(a) or 3(b) above has been checked.
 (a) The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of **\$325,000.00**.
 (b) _____ The fee is computed on the fair market value of the realty which is \$_____.
 (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is \$_____.
5. Check YES _____ or NO to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. If "YES," the amount of the outstanding balance of this lien or encumbrance is \$N/A.
6. The DEED Recording Fee is computed as follows:
 (a) \$325,000.00 the amount listed in item 4 above
 (b) \$ 0.00 the amount listed in item 5 above (no amount place zero)
 (c) \$325,000.00 Subtract Line 6(b) from Line 6(a) and place the result.
7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: **the closing attorney**.
8. Check if Property other than Real Property is being transferred on this Deed.
 (a) _____ Mobile Home (b) _____ Other
9. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

Sworn to before me this 16th day of March, 2011.

BARR, UNGER AND McINTOSH, L.L.C.

Celeste McCollum (SEAL)
Notary Public for South Carolina

By: [Signature]
H. Wayne Unger, Jr

My Commission Expires 4/25/2015

Ryan Love

From: Taylor Davis <tdavis@rosenhagood.com>
Sent: Tuesday, March 20, 2018 3:56 PM
To: gpclawfirm@gmail.com; dan@charlestonlegal.com; Gordon Garrett; David K. Haller; angus@lawtonlawfirm.net; brandt@shelbournelaw.com; currylawfirm@bellsouth.net
Cc: Chandler@eckb.com; amy@eckb.com; Brew Hagood; Andrew D. Gowdown; Elizabeth Palmer; Ensley Mahoney
Subject: Colucci--Petition for Sale of Real Property
Attachments: 354216.pdf

Good Afternoon,

Please see attached the Petition for Sale of Real Property in connection to the above referenced matter. A hard copy has also been placed in today's mail.

Thank you.

Taylor Davis

[Legal Assistant to Andrew Gowdown]

151 Meeting St., Suite 400

Charleston SC 29401

| office | 843-577-6726

| fax | 843-724-8036

| direct phone | (843) 266-8125

| direct fax |

tdavis@rrhlawfirm.com

V-Card

www.rrhlawfirm.com

ROSEN | HAGOOD

CONFIDENTIALITY NOTICE

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CIRCULAR 230 DISCLOSURE

To comply with U.S. Treasury Department regulations, we inform you that, unless otherwise expressly indicated, any tax advice contained in this communication (including any attachments or enclosures) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the Internal Revenue Code or any other applicable tax law, or (ii) promoting, marketing or recommending to another party any entity, investment, plan, transaction, arrangement, or other tax related matter.

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas**

Edgar W. Dickson, Circuit Court Judge

**Appellate Case No. 2019-001065
Dorchester County Case No(s). 2019-CP-18-0677 and 2017-CP-18-1816**

In Re: The Estate of Doris Duane Colucci

**Michael C. Fox, Named Personal Representative
in the Last Will of Doris Duane ColucciAppellant,**

v.

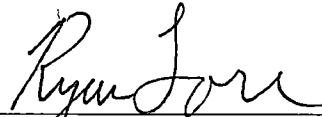
**Andrew W. Chandler, in his capacity as Special
Administrator of the Estate of Doris Duane Colucci,
Michael C. Fox, Successor Trustee of the
Colucci Living Trust, dated February 24, 2005,
Michael Fredrick Antonio Colucci, John Martin Antonio,
Henry Burkes, and Richard M. Hyman, Jr.....Respondents.**

RULE 210(G), SCACR, CERTIFICATION

I certify that Appellant's Supplement to Record on Appeal (955-959) and Supplement to Record on Appeal (177-A; 960-982) contains all material proposed to be included by any of the parties and not any other material.

RECEIVED
MAR 11 2020
SC Court of Appeals

Dated: March 9, 2020



Gordon H. Garrett
office@garrettlawsc.com
Ryan A. Love
rlove@garrettlawsc.com
Garrett Law Offices, LLC
1075 E. Montague Ave.
North Charleston, SC 29405
843.554.5515 (phone)
843.747.3198 (telefax)
Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

MAR 11 2020

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2019-001065
Dorchester County Case No(s). 2019-CP-18-0677 and 2017-CP-18-1816

In Re: The Estate of Doris Duane Colucci

Michael C. Fox, Named Personal Representative
in the Last Will of Doris Duane ColucciAppellant,

v.

Andrew W. Chandler, in his capacity as Special
Administrator of the Estate of Doris Duane Colucci,
Michael C. Fox, Successor Trustee of the
Colucci Living Trust, dated February 24, 2005,
Michael Fredrick Antonio Colucci, John Martin Antonio,
Henry Burkes, and Richard M. Hyman, Jr.....Respondents.

Certificate of Service

The undersigned certifies that the persons set forth below were served with a copy of Appellant's Motion to Supplement Record (Second), and Appellant's Rule 210(g), SCACR, Certification by placing them in the U.S. Mail, First Class, postage-prepaid on the date below to the following addresses:

Angus Lawton
Lawton Law Firm, LLC
496 Bramson Court, Suite 100
Mt. Pleasant, SC 29464
Attorney for Michael A. Colucci
and John M. Antonio


Elizabeth J. Palmer
Rosen, Rosen & Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
Attorney for Andrew Chandler

M. Richardson Hyman, Jr. Esquire
Law Firm of M. Richardson Hyman, Jr.
P.O. Box 127
Charleston, SC 29402

Adam Mlynarczyk
Koontz Mlynarczyk, LLC
1058 E. Montague Avenue
North Charleston, SC 29405
Attorney for Henry Burkes

Gordon H. Garrett, Esquire
Garrett Law Offices, LLC
1075-A E. Montague Ave.
North Charleston, SC 29405
Attorney for the Colucci Living Trust

Dated: March 9, 2020



Ryan A. Love
Garrett Law Offices, LLC
1075-A E. Montague Ave.
North Charleston, SC 29405
843.554.5515 (phone)
843.747.3198 (telefax)
office@garrettlawsc.com

Garrett Law Offices

Ltd. Co.

Gordon H. Garrett (Ret.)
Gordon H. Garrett
Jason Scott Luck
Ryan A. Love

1075 East Montague Avenue
North Charleston, SC 29405
843.554.5515 (O) 843.747.3198 (F)
office@garrettlawsc.com

9 March 2020

RECEIVED

MAR 11 2020

SC Court of Appeals

Via Priority Mail

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Michael C. Fox v. Andrew Chandler et al.
Appellate Case No. 2019-001065
Dorchester County Case No. 2019-CP-18-0677 and 2017-CP-18-1816

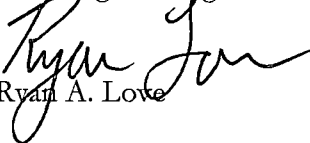
Dear Ms. Kitchings:

Enclosed, please find one (1) original and six (6) copies of Appellant's Motion to Supplement Record (second), Appellant's Rule 201(g), SCACR, Certification (for Appellant's first and second Supplement to Record), and the Certificate of Service for the same, in reference to the above case.

Also enclosed, please find check no. 1812 in the amount of \$50.00 for the motion fee.

Please do not hesitate to contact our office should you need any additional information.

With Highest Regards,


Ryan A. Love

/RAL

Enclosures

cc: Elizabeth J. Palmer, Esquire
Angus Lawton, Esquire
Adam Mlynarczyk, Esquire
M. Richard M. Hyman, Esquire
Gordon H. Garrett, Esquire

Garrett Law Offices, LLC
1075-A E. Montague Ave.
North Charleston, SC 29405

 Click-N-Ship®	
P	usps.com 9405 5036 9930 0278 5106 44 0087 0002 0222 9201 \$8.70 US POSTAGE 
	03/09/2020 2 lb 2 oz Mailed from 29405 0625000000312
PRIORITY MAIL 2-DAY™	
GORDON H GARRETT GARRETT LAW OFFICES 1075A E MONTAGUE AVE N CHARLESTON SC 29405-4825	Expected Delivery Date: 03/11/20 0004
Carrier -- Leave if No Response	C076
SHIP TO: JENNY A KITCHINGS SC COURT OF APPEALS 1220 SENATE ST COLUMBIA SC 29201-3769	
USPS TRACKING #	
	
9405 5036 9930 0278 5106 44	
Electronic Rate Approved #038555749	

RECEIVED
MAR 11 2020
SC Court of Appeals

2.16