

STATE OF SOUTH CAROLINA
IN THE SUPREME

APPEAL FROM CHEROKEE COUNTY
COURT OF COMMON PLEAS

THE HONORABLE GORDON G. COOPER
CASE NO. 2015-CP-11-0319

Brenda Halsey, Bernay F. Halsey, Jr., Demont Halsey,
Fredericka Halsey and Brittany Halsey,

Appellants,

versus

Gwendollette Halsey Simmons, Kenneth Wayne Oglésby,
Roderick Terrill Oglesby, any heirs of the Rederick Gaffney Estate,
known and unknown, who may claim any interest in the subject
property, and any unknown heirs or parties who may claim title or
ownership in the real estate which is the subject of this action, Elijah
Reddish, Jackie W. Williams, as Cherokee County Treasurer, or the
Successor in Office, Vernon L. Price, as Delinquent Tax Collector of
Cherokee County, or the Successor in Office,

RECEIVED
MAR 04 2020
SC Court of Appeals

Of Whom,

Gwendollette Halsey Simmons, Elijah Reddish, Jackie W. Williams, as Cherokee
County Treasurer, or the Successor in Office, Vernon L. Price, as Delinquent Tax
Collector of Cherokee County, or the Successor in Office, are the

Respondents.

**APPENDIX TO PETITION
FOR
WRIT OF CERTIORARI**

Richard H. Rhodes
William H. Rhodes
BURTS TURNER & RHODES
Attorneys for Petitioner
260 North Church Street
Spartanburg, SC 29306
(864) 585-8166

OTHER COUNSEL OF RECORD:

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221 W. Floyd Baker Blvd.
Gaffney, SC 29340

George Brandt, III, Esquire
Attorney for Elijah Reddish
360 E. Henry Street
Spartanburg, SC 29302

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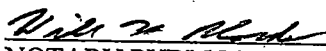
PROOF OF DELIVERY

This is to certify that on the 2nd day of March, 2020, the undersigned, secretary to Richard H.
Rhodes, Esq., served a copy of the APPENDEX TO PETITION FOR WRIT OF CERTIORARI by
depositing a copy of the same into the United States Mail, postage pre-paid and in the correct amount to the
following:

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


JO ANN CHAMPION

SWORN to before me this 2nd
day of March, 2020.

 (SEAL)
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 3/23/27

BURTS TURNER & RHODES
ATTORNEYS AT LAW

SAM BURTS (1907 - 1982)
NOEL TURNER (1928 - 2011)
RICHARD H. RHODES
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March 2, 2020

The Honorable Jenny Abbott Kitchings
Clerk, The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

Re: Brenda Halsey, et al vs. Gwendollette Halsey Simmons, et al
Appellate Case No. 2017-001459

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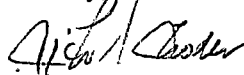
Dear Ms. Kitchings:

I have enclosed the following in regards to the above named matter:

1. A copy of the Petition for Writ of Certorari filed by the Appellants;
2. A copy of the cover page for the Appendix to the Petition (since you already had copies of the Record, Briefs and Orders, I did not send copies of those – if you need me to send copies, please let me know and I will do so).
3. Copies of Proofs of Delivery.

Please do not hesitate to contact me if you should have any questions or require any further information.

Sincerely,


Richard H. Rhodes

RHR/jc
Enc.

cc:
Joseph L.V. Johnson, Esquire
Joseph L. Mathis, Esquire
Attorney for Jackie W. Williams
as County Treasurer and Vernon
L. Price, as Delinquent Tax Collector
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TO:
 The Hon. Jenny Abbott Kitchings
 Clerk, S.C. Court of Appeals
 P.O. Box 11629
 Columbia SC 29201

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