

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Apr 22 2020

SC Court of Appeals

Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2019-001609

Rachel Farley, as Trustee of the Louise Farley Revocable Trust Dated February 8, 2005;  
Drummond B. Farley; Rachel R. Farley; Carol E. Farley; and Nancy E. Farley, Appellants,

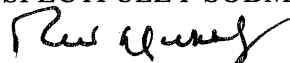
v.

Church of the Harvest of Columbia, Inc., Respondent.

CERTIFICATE OF COUNSEL AS TO THE  
COUNTERDESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL

The undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that this designation  
contains no matter which is irrelevant to the appeal.

RESPECTFULLY SUBMITTED,



Robert W. Dibble, Jr., SC Bar #1675  
Harrell, Martin & Peace, P.A.  
135 Columbia Avenue  
Post Office Box 1000  
Chapin, South Carolina 29036  
Telephone: (803) 345-3353  
ATTORNEYS FOR RESPONDENT

April 22, 2020  
Chapin, South Carolina

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Drummond B. Farley; Rachel R. Farley; Carol E. Farley; and Nancy E. Farley, Appellants,

v.

Church of the Harvest of Columbia, Inc., Respondent.

PROOF OF SERVICE


The undersigned hereby certifies that on April 22, 2020 she caused the *Certificate of Counsel as to the Counterdesignation of Matter to be Included in the Record on Appeal* to be sent via United States Postal Service, first class mail, with adequate postage prepaid, to the parties listed below:

William H. Edwards  
Moore Taylor Law Firm  
Post Office Box 5709  
West Columbia, SC 29171

Drummond B. Farley  
742 C. Avenue  
West Columbia, SC 29169

Carol E. Farley  
Post Office Box 1570  
Johns Island, SC 29457

Nancy E. Farley  
Post Office Box 1570  
Johns Island, SC 29457

  
Rebecca D. Baker, Paralegal  
Harrell, Martin & Peace, P.A.

Chapin, South Carolina  
April 22, 2020

L.K. "Trey" Harrell, III  
Jeremy C. Martin  
M. Alan Peace \*\*  
Taylor A. Peace  
Andrea "Andi" Cornelison  
Erik T. Norton

Robert W. Dibble, Jr. \*  
William Jennings (Bill) Buchanan \*  
Donald W. Tyler \*  
Thomas B. Jackson, III \*

\*Of Counsel  
\*\*Certified Mediator/Arbitrator

April 22, 2020

**VIA EMAIL (ctappfilings@sccourts.org)**

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

**RECEIVED**  
**Apr 22 2020**  
**SC Court of Appeals**

RE: Rachel Farley, as Trustee of the Louise Farley Revocable Trust Dated February 8, 2005;  
Drummond B. Farley; Carol E. Farley; and Nancy E. Farley v. Church of the Harvest of  
Columbia, Inc.  
Appellate Case No. 2019-001609  
Our File No. 3303.28245

Dear Madam Clerk:

Pursuant to the direction of Sierra Ritchie, please find attached for filing a copy of the *Certificate of Counsel as to the Counterdesignation of Matter to be Included in the Record on Appeal* and *Proof of Service* in the above-referenced matter. It is my understanding that, due to coronavirus restrictions, we are not to mail the filing but, instead, are to email it to the email address listed above for filing. If I am incorrect, please let me know as soon as possible.

Thank you for your time and assistance in this matter. By copy of this letter and aforementioned pleadings, we are serving same upon all parties of record.

Yours very truly,



Rebecca D. Baker  
Paralegal to Robert W. Dibble, Jr.

/rdb

Attachments

cc: William H. Edwards, Esquire  
Mr. Drummond B. Farley  
Ms. Carol E. Farley  
Ms. Nancy E. Farley