

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
CIRCUIT COURT

Daniel D. Hall, Circuit Court Judge

Civil Case No.: 2017-CP-46-01964  
Appellate Case No. 2020-000027

**RECEIVED**  
JUN 10 2020  
SC Court of Appeals

Winston Shell.....Respondent,

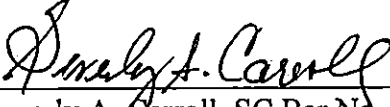
v.

Nathaniel Shell.....Appellant.

**PROOF OF SERVICE**

The undersigned certifies that she has served this Initial Brief of Respondent by depositing a copy of it via Federal Express, postage prepaid, on June 9, 2020, addressed to its attorneys of record to the below addresses:

T. Jeff Goodwyn, Jr.  
Goodwyn Law Firm, LLC  
2519 Devine Street; Suite A  
Columbia, South Carolina 29205

  
Beverly A. Carroll, SC Bar No. 1144  
Joe Terrious K. Neal, SC Bar No. 104319  
Morton & Gettys, LLC  
P.O. Box 707  
Rock Hill, SC 29731  
803.366.3388

Attorneys for Respondent

# MORTON & GETTYS

ATTORNEYS AT LAW

**RECEIVED**  
JUN 10 2020  
SC Court of Appeals

June 9, 2020

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RE: Shell v. Shell**  
**Appellate Case Number: 2020-000027**  
**Morton & Gettys Matter Number: 19-966-10-L**

Dear Sir or Madam:

Enclosed please find the original and one copy of the following:

- Respondent's Designation of Matter; Certificate of Counsel; Proof of Service
- Initial Brief of Respondent; Proof of Service

Please file the original and return a clocked copy in the self-addressed stamped envelope provided for your convenience. Please do not hesitate to contact our office with any questions. With kind regards, I am

Sincerely,

  
Britney M. Mosteller  
Legal Secretary for Beverly A. Carroll

BMM/

Enclosures

cc: T. Jeff Goodwyn, Jr.

JAMES M. MORTON

JOHN P. GETTYS, JR. \*

MICHAEL B. SMITH †

JOSHUA B. VANN

ELIZABETH SMITH OWEN

J. RICHARDS MCCRAE, III

MELISSA G. CASSELL ◆

DANIEL J. BALLOU •

JOSEPH L. RAAD †

J. NATHANIAL PIERCE §

LYNELLE D. MORGAN ■

DAVIS C. RIDDLE

LANCE F. JOHNSON ▲

BEVERLY A. CARROLL § ‡

JOE TERRIOUS K. NEAL

Certified Civil Court Mediator \*

Certified Circuit Court Arbitrator & †

Certified Family Court Mediator

Certified Specialist in Estate Planning  
and Probate Law †

Certified Specialist in Employment Law ‡

Licensed in SC & NC §

Licensed in SC & TX •

Licensed in SC & MI ■

Licensed in GA & IL ▲

Licensed in SC, NC, GA ◆

www.mortongettys.com

Fountain Park Place  
331 E Main Street, Suite 300  
Post Office Box 707  
Rock Hill, SC 29731  
office 803.366.3388  
fax 803.366.4044

A LIMITED LIABILITY COMPANY

ORIGIN ID: MEOA (803) 366-3404  
BRITNEY MOSTELLER

331 EAST MAIN ST STE 300

ROCK HILL, SC 29730  
UNITED STATES US

SHIP DATE: 09JUN20  
ACTWGT: 0.50 LB  
CAD: 110516247/INET4220

BILL SENDER

TO SOUTH CAROLINA COURT OF APPEALS

1220 SENATE STREET

COLUMBIA SC 29201

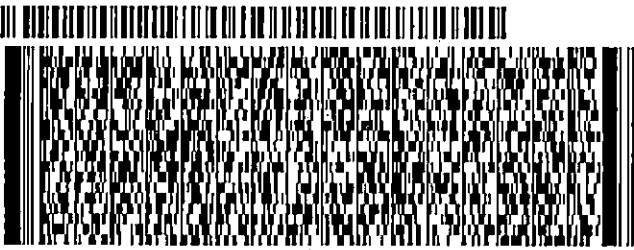
(803) 366-3388  
INV.  
PO:

REF:

DEPT:

56BJ1C7DDIFE4A

FedEx Ship Manager - Print Your Label(s)



FedEx Express



J201120043401UP

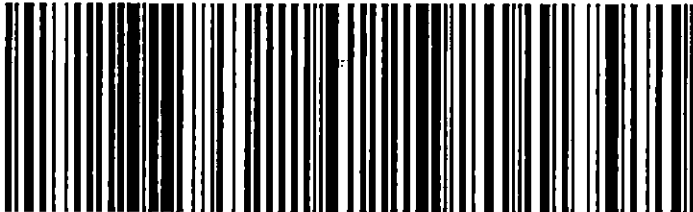
WED - 10 JUN 10:30A

PRIORITY OVERNIGHT

TRK# 7706 5943 7182  
0201

XH USCA

29201  
SC-US CAE



RECEIVED

JUN 10 2020

SC Court of Appeals

6/9/2020