

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2019-CP-04-00337

Florence Keese, *pro se*, *et al.*
Appellants

v.

Frances K. Chestnut, *et al.*
Respondents

RECEIVED

Nov 12 2020

SC Court of Appeals

APPELLANTS' SUPPLEMENTAL RECORD ON APPEAL

Margo Keese
11608 Stewart Lane, Apt. 302
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Other Counsel of Record:
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JONES LAW FIRM, PA
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STATE OF SOUTH CAROLINA

) IN THE COURT OF COMMON PLEAS

COUNTY OF ANDERSON

) C. A. No. 2019-CP-04-00337

Frances K. Chestnut, Elizabeth Diane Keese,
Sylvester Keese, Arthur B. Keese and Mary
K. Taylor,

Plaintiffs,

) AFFIDAVIT OF RICHARD MARGOLIS

v.

Florence Keese, Marcy Keese, Margo Keese
and Marshall Keese,

Defendants.


PERSONALLY APPEARED before me, an officer duly authorized by law to administer oaths, Richard Margolis, who after first being duly sworn, states:

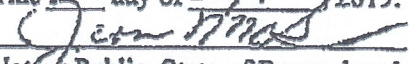
1. My name is Richard Margolis and I am competent in all aspects to testify regarding the matters set forth herein.
2. I am an attorney licensed to practice law in Pennsylvania.
3. I was contacted by Marshall Keese in March 2019 regarding a quiet title action filed against him, Florence, Marcy, and Margo Keese in Anderson, South Carolina.
4. I informed him that while I was not licensed to practice law in South Carolina I would contact the attorney for the Plaintiff.
5. I emailed Ms. Baird, the attorney for the Plaintiff, and told her that I had been contacted by the Keese family about the action. Ms. Baird told me she could not speak to me about the matter unless I filed a notice of appearance with the court in South Carolina
6. After she told me this, I again advised Mr. Keese that I was not licensed in South Carolina and could not file an answer on his and his family's behalf, but I would try to help him find an attorney in South Carolina.

7. Mr. Keese must have misunderstood my communications with him and there may have been some miscommunication between us about the time of service and deadline for filing an answer.

8. Thereafter, I did not receive any notice that the Plaintiff was attempting to have a default entered against the Keeses for failing to answer the complaint.

FURTHER THE AFFIANT SAYETH NAUGHT.


Richard Margolis

Sworn to and subscribed before me
This 7th day of Sept, 2019.

Notary Public, State of Pennsylvania
My commission expires: _____

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JOAN MCGOVERN, Notary Public
City of Philadelphia, Phila. County
My Commission Expires December 2, 2020

STATE OF SOUTH CAROLINA

) IN THE COURT OF COMMON PLEAS

COUNTY OF ANDERSON

) C. A. No. 2019-CP-04-00337

Frances K. Chestnut, Elizabeth Diane Keese,
Sylvester Keese, Arthur B. Keese and Mary
K. Taylor,

Plaintiffs,

) **AFFIDAVIT OF MARSHALL KEESE**

v.

Florence Keese, Marcy Keese, Margo Keese
and Marshall Keese,

Defendants.

PERSONALLY APPEARED before me, an officer duly authorized by law to administer oaths, Marshall Keese, who after first being duly sworn, states:

1. My name is Marshall Keese and I am competent in all aspects to testify regarding the matters set forth herein.
2. My family and I received a letter from the Plaintiffs' attorney, Ms. Crystal Baird, in March 2018 telling us that some of our family members wanted to divide property in Anderson County, South Carolina that our grandmother had deeded to all of us.
3. We told the Plaintiffs and Ms. Baird that we would not agree to sign any quitclaim deeds or give our consent to divide the property.
4. I contacted Richard Margolis, an attorney in Pennsylvania who was handling another matter for me, about the letter, and he contacted Ms. Baird to discuss the case.
5. I called Mr. Margolis right after I was served with a Summons and Complaint on April 10, 2019 to let him know that I had been served.
6. Mr. Margolis told me he was not licensed in South Carolina, but he said he would try to help me find an attorney in South Carolina.

- 7. I did not receive a copy of any notices, motions, or pleadings filed in this case after I was served with the Summons and Complaint.
- 8. I followed up with Mr. Margolis again, and he told me he was still trying to find an attorney in South Carolina.
- 9. When I called Mr. Margolis again in July, he told me he had been unable to find an attorney in South Carolina to handle the case and recommended that I try to find one myself.
- 10. I retained Mr. Holder's firm to represent my mother, my sisters, and me at the end of July 2019.
- 11. I did not know the Plaintiffs were trying to have a default entered against me until my new attorney, Mr. Holder, told me a default judgment had been filed on July 1, 2019.
- 12. I did not receive notice of any motion or hearing related to the case whatsoever.
- 13. If I had been aware of any motions or hearings, I would have immediately contacted my attorney in Pennsylvania to advise me on what to do.

FURTHER THE AFFIANT SAYS: NAUGHT.

Marshall Keese

Marshall Keese

Sworn to and subscribed before me.
This 7th day of December, 2019.

Notary Public, State of Pennsylvania
My commission expires: 05-16-19

Commonwealth of Pennsylvania - Notary Seal
JIGNESH AMIN, Notary Public
Philadelphia County
My Commission Expires May 16, 2022
Commission Number 1331023

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

Frances K. Chestnut, Elizabeth Diane Keese,
Sylvester Keese, Arthur B. Keese and Mary
K. Taylor,

Plaintiffs,

v.

Florence Keese, Marcy Keese, Margo Keese
and Marshall Keese,

Defendants,

IN THE COURT OF COMMON PLEAS

C. A. No. 2019-CP-04-00337

AFFIDAVIT OF FLORENCE KEESE

PERSONALLY APPEARED before me, an officer duly authorized by law to administer oaths, Florence Keese, who after first being duly sworn, states:

1. My name is Florence Keese and I am competent in all aspects to testify regarding the matters set forth herein.
2. My family and I received a letter from the Plaintiffs' attorney, Ms. Crystal Baird, in March 2018 telling us that some of our family members wanted to divide our property in Anderson County, South Carolina.
3. We told the Plaintiffs and Ms. Baird that we would not agree to sign any quitclaim deeds or give our consent to divide the property.
4. My son, Marshall, contacted Richard Margolis, an attorney in Pennsylvania, on our behalf about the letter.
5. Marshall handled all communication with Mr. Margolis on my behalf
6. I did not receive a copy of any notices, motions, or pleadings filed in this case after I was served with the Summons and Complaint in April 2019.

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7. I understood that Mr. Margolis was helping us find an attorney in South Carolina to handle the case.

8. When we learned that Mr. Margolis could not find us an attorney, we retained Mr. Holder's firm to represent us at the end of July 2019.

9. I did not know the Plaintiffs were trying to have a default entered against me until our new attorney, Mr. Holder, told me a default judgment had been filed on July 1, 2019.

10. I did not receive notice of any motion or hearing related to the case whatsoever.

FURTHER THE AFFIANT SAYETH NAUGHT.

Florence Keese

Florence Keese

Sworn to and subscribed before me

This 30 day of Sept, 2019.

Jodie L. Rosenthal-Young
Notary Public, State of Pennsylvania

My commission expires: 01/10/2020

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
JODIE L. ROSENTHAL-YOUNG, Notary Public
East Goshen Twp., Chester County
My Commission Expires January 10, 2020

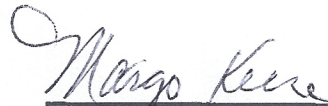
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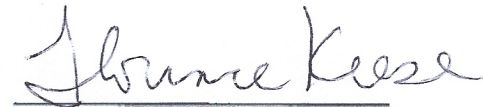
CERTIFICATE OF APPELLANTS

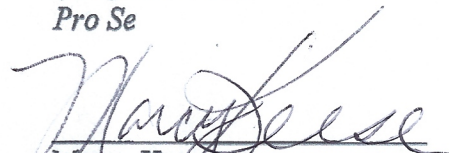
Appellants, on this 11th day of November 2020, hereby certify that attached Supplemental Record On Appeal contains all additional material proposed to be included by any of the parties and not any other material:


Respectfully submitted,

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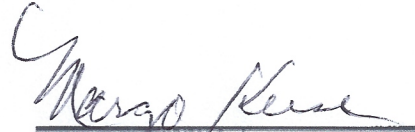

Marshall Keese
1035 Ridgheaven Road
West Chester, PA 19382
(215) 680-8366
Pro Se

CERTIFICATE OF SERVICE

Appellants, on this 11th day of September 2020, hereby certify that attached Response was filed in this Court by **EMAIL** and served by **FIRST CLASS MAIL** on the person noted below:

Other Counsel of Record:
Carolyn G. Baird, Esquire
JONES LAW FIRM, PA
Post Office Box 987
Anderson, South Carolina 29622
Attorney for Respondent
(864) 224-3474

Respectfully submitted,



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