

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

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Case No. 2019-CP-04-00337

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

v.

Frances K. Chestnut, *et al.*  
Respondents

**RECEIVED**

**Nov 12 2020**

**SC Court of Appeals**

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**APPELLANTS' SUPPLEMENTAL RECORD ON APPEAL**

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Margo Keese  
11608 Stewart Lane, Apt. 302  
Silver Spring, MD 20904  
(484) 716-5255  
*Pro Se*

Marcy Keese  
1035 Ridgehaven Road  
West Chester, PA 19382  
(215) 680-8366  
*Pro Se*

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

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

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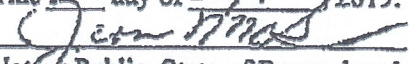


7. Mr. Keese must have misunderstood my communications with him and there may have been some miscommunication between us about the time of service and deadline for filing an answer.

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 SAYETH NAUGHT.**

*Marshall Keese*  
\_\_\_\_\_  
Marshall Keese

Sworn to and subscribed before me.  
This 7<sup>th</sup> day of December, 2019.

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

Commonwealth of Pennsylvania - Notary Seal  
SIGNESH 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.

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

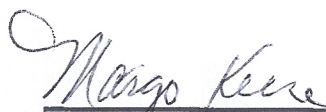
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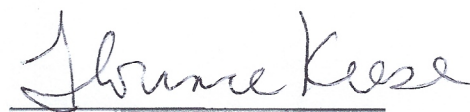
**CERTIFICATE OF APPELLANTS**

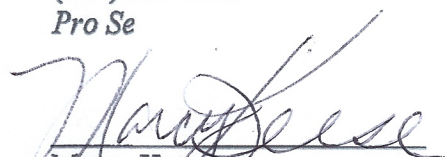
Appellants, on this 11th day of November 2020, hereby certify that attached Supplemental Record On Appeal contains all additional material proposed to be included by any of the parties and not any other material:


Respectfully submitted,

**RECEIVED**  
**Nov 12 2020**  
**SC Court of Appeals**

  
Margo Keese  
11608 Stewart Lane, Apt. 302  
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(484) 716-5255  
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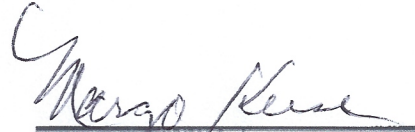
  
Marshall Keese  
1035 Ridgheaven Road  
West Chester, PA 19382  
(215) 680-8366  
*Pro Se*

**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,

A handwritten signature in cursive script that reads "Margo Keese". The signature is written in black ink and is positioned above a horizontal line.

Margo Keese  
Margo Keese  
11608 Stewart Lane, Apt. 302  
Silver Spring, Maryland 20904  
(484) 716-5255  
*Pro Se*