

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

James B. Jackson, Jr., Master-In-Equity

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Appellate Case No.: 2020-001006

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**RECEIVED**

**Nov 09 2020**

**SC Court of Appeals**

Sara Gleaton, as Personal Representative of the Estate of Wilton Gleaton, ..... Appellant,

-v-

Orangeburg County, A Political Subdivision of the State of South Carolina, ..... Respondent.

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**APPELLANT’S DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL**

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Appellant designates the following items for inclusion in the Record on Appeal, in addition to materials designated by the Respondent. Appellant reserves the right to seek to supplement the record pursuant to Rule 212, SCACR.

1. Final Order, filed December 31, 2014;
2. Order Dismissing Plaintiff’s Claim for Damages, filed December 27, 2019;
3. Order Denying Plaintiff’s Motion to Alter or Amend, filed June 11, 2020;
4. Summons and Complaint, filed December 9, 2010;
5. Answer to Complaint, filed February 3, 2011;
6. Plaintiff’s Motion to Alter or Amend, filed January 13, 2020
7. Hearing Transcript from September 17, 2014 including exhibits:
  - Ex. 1 – June 16, 1999 Deed, Last Titleholder Notice

- Ex. 2 – August 4, 1999 Deed, Title to Real Estate
  - Ex. 3 – August 17, 1999, Real Estate Mortgage
  - Ex. 4 – Certificate of Title
  - Ex. 5 – February 23, 2000 Letter from Delinquent Tax Collector
  - Ex. 6 – March 31, 2000 Letter from Delinquent Tax Collector
  - Ex. 7 – January 5, 2001 Letter from Delinquent Tax Collector
  - Ex. 8 – May 3, 2001 Deed, Title to Real Estate
  - Ex. 9 – Tax Receipt 1999
  - Ex. 10 – Tax Receipt 2000
  - Ex. 11 – Tax Receipt 2001
  - Ex. 12 – Delinquent Property Tax Receipt 2002
  - Ex. 13 – Delinquent Property Tax Receipt 2003
  - Ex. 14 – Tax Receipt 2004
  - Ex. 15 – Delinquent Property Tax Receipt 2005
  - Ex. 16 – Quitclaim Deed filed August 11, 2006
  - Ex. 17 – Tax Receipt 2006
  - Ex. 18 – Tax Receipt 2007
  - Ex. 19 – February 5, 2007 Exclusive Right to Sell Listing Agreement
  - Ex. 20 – Delinquent Property Tax Receipt 2008
  - Ex. 21 – Tax Receipt 2009
  - Ex. 22 – November 9, 2009 Letter from County of Orangeburg to Shuler
  - Ex. 23 – November 17, 2009 Release of Agreement to Buy and Sell Real Estate
  - Ex. 24 – Distribution of Tax Bill Receipt
  - Ex. 25 – Delinquent Sales Documents
  - Ex. 26 – Tax Map
8. Deposition Transcript of Sarah Gleaton dated December 13, 2011;
9. Deposition Transcript of Shelton Sistrunk dated December 13, 2011 including exhibits:
- Ex. 1 – Foreclosure Document recorded on July 8, 1999
  - Ex. 2 – Title to Real Estate Recorded on August 20, 1999
  - Ex. 3 – Final Notice to Debra Foxworth dated January 5, 2001
  - Ex. 4 – Letter to Debra Foxworth dated February 23, 2000
  - Ex. 5 – Letter to Debra Foxworth dated March 31, 2000
  - Ex. 6 – Title to Real Estate from Delinquent Tax Collector to James Fields recorded May 10, 2001
  - Ex. 7 – Quit-Claim Deed dated August 15, 2006
  - Ex. 8 – Tax Notices
  - Ex. 9 – Tax Notices
10. Deposition Transcript of Kathy Henderson dated December 13, 2011;
11. Deposition Transcript of D’Anne Haydel dated December 13, 2011 including exhibits:

- Ex. 1 – Letter to John Shuler from D’Anne Haydel dated November 9, 2009
- 12. Letter of July 8, 2020 from Barnes to Clerk, SC Court of Appeals filing Notice of Appeal;
- 13. Letter of July 28, 2020 from Parker to Clerk, SC Court of Appeals advising transcript received

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

November 9, 2020  
Hampton, South Carolina

BY:  \_\_\_\_\_

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William F. Barnes, III  
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ATTORNEYS FOR APPELLANT

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Sara Gleaton, as Personal Representative of the Estate of Wilton Gleaton, ..... Appellant,

v.

Orangeburg County, A Political Subdivision of the State of South Carolina ..... Respondent,

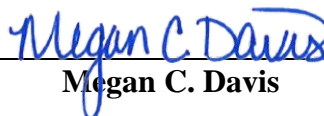
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**CERTIFICATE OF SERVICE**

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This is to certify that I, *Megan C. Davis*, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Counsel for the Respondent, have this date emailed a true and correct copy of the within *Appellant's Designation of Matter to be Included in the Record on Appeal* to:

Jerrod A. Anderson, Esquire  
Anderson Law Firm, P.A.  
P.O. Box 2629  
Orangeburg, SC 29116  
[jerrodanderson@att.net](mailto:jerrodanderson@att.net)  
*Attorney for Respondent*

  
\_\_\_\_\_  
Megan C. Davis

November 9, 2020  
Hampton, South Carolina

November 9, 2020

John E. Parker, Jr.  
Dial: (803) 943-2111  
Email: jayparker@pmped.com  
Paralegal: mdavis@pmped.com

**Via Email Only: ctappfilings@sccourts.org**

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

**Re: Sara Gleaton as PR for Estate of Wilton Gleaton v. Orangeburg County  
Appellate Case No.: 2020-001006**

Dear Ms. Kitchings:

Please find enclosed for filing, Appellant's Initial Brief and Designation of Matter to be Including in the Record on Appeal in the above-referenced case.

By copy of this letter, Appellant's Initial Brief and Designation of Matter is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker, Jr.

JEP2/mcd  
Enclosures as stated

cc: Jerrod A. Anderson, Esquire