

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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**Dec 09 2020**

**S.C. SUPREME COURT**

APPEAL FROM CHEROKEE COUNTY  
Court of Common Pleas  
The Honorable Gordon G. Cooper, Master-in-Equity

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Case No: 2015-CP-11-0319  
Appellate Case No.: 2020-000401

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Brenda Halsey, Bernay F. Halsey, Jr., Demont Halsey,  
Fredericka Halsey and Brittany Halsey,

Appellants,

v.

Gwendollette Halsey Simmons, Kenneth Wayne Oglesby,  
Roderick Terrill Oglesby, any heir of the Roderick Gaffney  
Estate, known or unknown, who may claim any interest  
in the subject property, and any unknown heirs or parties  
who may claim title or ownership in the real estate which  
is the subject of this action, Elijah Redish, Jackie W.  
Williams, as Cherokee County Treasurer, or the Successor  
in Office, Vernon L. Price, as Delinquent Tax Collector of  
Cherokee County, or the Successor in Office,

Respondents,

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**PROOF OF SERVICE**

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I certify that I have served a copy of the **MOTION TO ALTER OR AMEND** on November 23,  
2020 by e-mailing a copy of the same to the following:

Anna-Karina Parker  
parker@winter-rhoden.com  
Attorney for Gwendollette Halsey Simmons (deceased)  
221 E. Floyd Baker Blvd.  
Gaffney, SC 29340

George Brandt III  
gbrandt@hbvlaw.com  
Attorney for Elijah Redish  
360 E. Henry St.  
Spartanburg, SC 29302

Richard Rhodes  
richard@btrlawfirm.com  
Attorney for Appellant  
260 North Church Street  
Spartanburg, SC 29306

Respectfully submitted this the 23<sup>rd</sup> day of November, 2020

s/ Joseph L.V. Johnson

Joseph L. V. Johnson (SC Bar #: 77477)

Joseph L. Mathis (SC Bar #: 11782)

Saint-Amand, Thompson & Mathis, LLC

210 S. Limestone Street, Suite 1

Gaffney, SC 29340-3014

Phone: (864) 489-6052

Fax: (864) 489-5406

Attorneys for Respondent Jackie W. Williams, as  
Cherokee County Treasurer, or the Successor in  
Office, Vernon L. Price, as Delinquent Tax  
Collector of Cherokee County, or the Successor in  
Office

**From:** Joseph L.V. Johnson <JoeJohnson@satmlc.com>  
**Sent:** Monday, November 23, 2020 3:47 PM  
**To:** 'Richard Rhodes'  
**Cc:** Buck Brandt; AK Parker  
**Subject:** Halsey vs. Simmons--Appellate Case No. 2020-000401  
**Attachments:** Exhibit B.pdf; Exhibit A.pdf; Motion to Alter.pdf

Good afternoon counselors,

Attached, please find the Motion to Alter or Amend filed by Cherokee County in the above-referenced case.

Sincerely,

Joseph L.V. Johnson  
Saint-Amand, Thompson & Mathis, LLC  
Attorneys-at-Law  
210 S. Limestone Street, Suite 1  
Gaffney, SC 29340-3014  
(2<sup>nd</sup> Floor of First Piedmont Federal)  
Tel: 864-489-6052  
Fax: 864-489-5406

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