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FORM 1

NOTICE OF APPEAL IN A CIVIL CASE

SC Court of Appeals

The State of South Carolina
In The Court of Appeals
In The Supreme Court
In The Appellate Court

APPEAL FROM SUMTER COUNTY
Court of Common Pleas
Michael M. Jordan, Master In Equity

Case No. 2015-CP-43-1981

Edward Mays and Corrine Mays,

Respondent,

v.

Irene L. Myers,

Appellant.

NOTICE OF APPEAL

Irene L. Myers Appeals the order [judgment] of the Honorable Michael M. Jordan, dated January 27, 2021 granting Plaintiffs' adverse possession claim. Appellant received copy of the electronically filed Order on January 30, 2021. Secondly, Irene L. Myers Appeals the Order [judgment] of the Honorable M. Jordan, dated January 27, 2021 granting Plaintiffs motion for restraining order, denying defendant's post trial motions, and establishing sustaining grounds for the Court's decision on the merits. Appellant received a copy of the electronically filed order on January 30, 2021.

Defendant's appeal will be based on, but not limited to, the following:

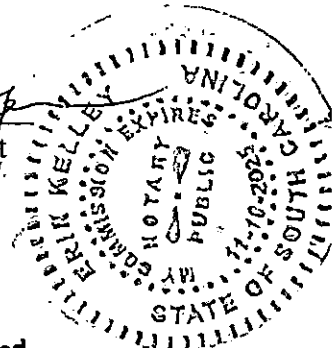
1. The Court, Master In Equity, did not apply the applicable law within this case, in that, South Carolina's "Mistaken Belief Rule" as applicable to boundary disputes between two adjoining land owners was ignored and the matter was treated as an ordinary variety adverse possession claim.

2. The Court's, Master In Equity's, Order was not supported by the facts within this case and Court failed to consider and explore evidence and facts relating to Respondent's mistaken belief regarding the location of boundary lines.
3. The Master In Equity failed to explore the issue of family relation and whether it may have impacted on Appellant's belief that the Respondent was protecting Appellant's property rights as a family member, an issue and evidence that would have negated Respondent's adverse possession claims.
4. The Court, Master In Equity, failed to apply the applicable standard of law and incorrectly awarded unfenced, unenclosed, and wooded portions of defendant's property.
5. The Court, Master In Equity, lacked jurisdiction of this outstanding five year case, which should have been returned to the Court of Common Plea.
6. The Court never addressed or delved into any of Appellant's pretrial and post trial motions and the record is unclear as to the Court's failure.
7. The Court's, Master In Equity's, Decision and Order relating to a restraining Order was not supported by either the law or facts within this case and failed to consider plaintiffs' bad acts and whether Plaintiffs' request for a restraining order was part of a larger scheme to defraud the Defendant of her property.

Dated: February 26, 2021

Irene L. Myers

Irene L. Myers, Appellant
 3150 Spencer Road
 Rembert, S.C. 29128
 803-757-5155



Other Counsel of Record:
 Patrick M. Killen
 1 Law Range, Suite B
 Sumter, S.C. 29150
 803-774-5026

Erin Kelley
 Erin Kelley

Sworn to and subscribed
 before me this 26 day of
February, 2021

STATE OF SOUTH CAROLINA)
COUNTY OF Sumter)

IN THE COURT OF COMMON PLEAS
_____ JUDICIAL CIRCUIT

CERTIFICATE OF SERVICE

Edward Mays and Corine Mays
Plaintiff,)

vs.)

Irene L. Myers
Defendant.)

Case No.: 2015 CP-43-1981

I certify that on this date, I served a copy of Notice of Appeal with
copies of orders appealed from in this action, dated
February 26, 2021, on Patrick M. Killen by

- Delivering it to him/her personally;
- Mailing it to him/her, at his/her last known address, by depositing it in the U.S.

Mail, in an envelope with sufficient postage affixed, addressed as follows:

Patrick M. Killen, / Law Range
Sumter SC 29150 ;

- Delivering it by commercial delivery service in accordance with Rule 4(d)(9),

SCRCP, addressed as follows:

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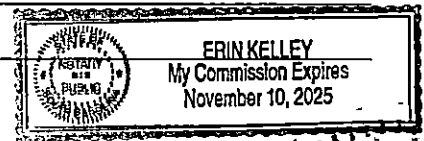
FEB 26 2021

SC Court of Appeals

- Other:

Notary Public

(See Rule 5(b)(1), SCRCP)



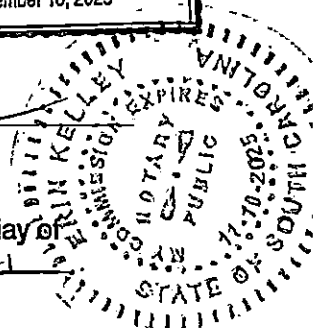
_____ Date

Erin Kelley
Signature

SCCA 255 (05/2013)

Erin Kelley
Erin Kelley

Sworn to and subscribed
before me this 26 day of
February, 2021



Irene L. Myers
3150 Spencer Road
Rembert, S.C. 29128

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SC Court of Appeals

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

* Hand Delivered on 2/26/2021
by Christopher Myers