

FORM 15

RECORD ON APPEAL

RECEIVED

MAR 30 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

[In The Supreme Court]

APPEAL FROM COLLETON COUNTY

Court of Common Pleas

Kenneth A. Campbell, Special Referee

Case No. 2019-001886

Patricia E. Campbell

Respondent,

V.

Joanne Ahearn and Robert J. Plum

Appellants.

RECORD ON APPEAL

Joanne Ahearn 3-24-2021

Joanne Ahearn Date

504 Forest Circle Apt. 123

Walterboro, South Carolina, 29488

843-603-0566

Pro See

Robert J. Plum 3/24/2021

Robert J. Plum Date

504 Forest Circle Apt. 123

Walterboro, South Carolina, 29488

843-603-0566

Pro See

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Order of October 7, 2019

CONFORMATORY DEED

October 7, 2019

RECORD OF HEARING

October 8, 2019

AFFIDAVIT FOR EXEMPT TRANSFERS

September 18, 2019

NOTICE OF HEARING

September 7, 2019

ORDER QUIETING TITLE TO PROPERTY

July 1, 2019

AFFIDAVIT OF DEFAULT

April 15, 2019

PETITION FOR PUBLICATION

May 22, 2019. An Affidavit of Default against the Defendants, Joanne Ahearn and Robert J. Plum, was filed with the Court on July 1, 2019.

The Order of Reference was filed on July 3, 2019 and the Amended Order of Reference was filed on August 26, 2019.

The Notice of Hearing was filed on September 18, 2019.

On or about December 18, 2018 the Plaintiff executed a general warranty deed transferring the Property to her daughter, Joanne Ahearn, and her daughter's boyfriend, Robert J. Plum as shown on the Title to Real Estate that was filed with the Colleton County Register of Deeds Office on the same date in Book 2702 at Page 271.

The Plaintiff was under duress and lacked the mental capacity to lawfully make the transaction complained of herein.

The Plaintiff made the conveyance to the Defendants as a result of the Defendants undue influence.

As a result of the Plaintiff's lack of capacity and/or Defendants actions, the Plaintiff is entitled to an order setting aside and annulling the conveyance of real estate complained of herein.

That any interest the Defendants may have in and to the Property should be extinguished and they should be barred from any future claims they may assert.

That the Plaintiff should be deemed the true and rightful owners of this property.

s/Benjamin C.P. Sapp
 Benjamin C.P. Sapp, Attorney for the Plaintiffs

October 7, 2019

STATE OF SOUTH CAROLINA)
COUNTY OF COLLETON)

AFFIDAVIT FOR EXEMPT TRANSFERS

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on the back of this affidavit and I understand such information.
2. The property being transferred is located at Turner Lane, bearing Colleton County Tax Map Number 168-00-00-056 was transferred by Kenneth A. Campbell, Jr., Special Referee to Patricia E. Campbell on August 13, 2019.
3. The deed is exempt from the deed recording fee because (See Information section of affidavit): This is a Confirmatory Deed used to confirm title already vested in the Grantee, #12.

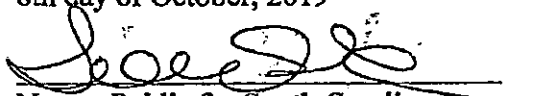
If exempt under exemption #14 as described in the Information section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase the realty? Check Yes or No

4. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Attorney
5. I understand that a person required to furnish this affidavit who wilfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.



Benjamin C.P. Sapp, Attorney

SWORN to before me this
8th day of October, 2019



Notary Public for South Carolina
Print Name: Lori A. Smoak
My Commission Expires: 2-19-20

STATE OF SOUTH CAROLINA)
)
COUNTY OF COLLETON)
)
PATRICIA E. CAMPBELL,)
)
)
Plaintiff,)
)
-vs-)
)
)
JOANNE AHEARN AND)
ROBERT J. PLUM,)
)
)
Defendant,)
)
_____)

IN COURT OF COMMON PLEAS
CASE NO. 2019-CP-15-00285

NOTICE OF HEARING

TO: THE ABOVE NAMED DEFENDANTS:

PLEASE TAKE NOTICE that a hearing in the above captioned matter is scheduled for October 7, 2019 at 2:00P.M. before the Special Referee, Kenneth A. Campbell, Jr., at 1337 Green Pond Highway, Walterboro, South Carolina. Such hearing is for a final judgment and all motions in the above-entitled action. You are invited to attend and participate pursuant to the South Carolina Rules of Civil Procedure and all applicable law. You are further advised, pursuant, to 14-11-110, *South Carolina Code of Laws* (as amended), that the Plaintiff's intent is to offer written testimony at this hearing if no objection is made to its entry.

Walterboro, South Carolina

18th day of September, 2019

s/Benjamin C.P. Sapp
Benjamin C.P. Sapp, Attorney for the Plaintiff
Sapp Law Firm
Post Office Box 258
Walterboro, South Carolina 29488
(843) 549-5923
(843) 549-3269 Facsimile

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF COLLETON)	CASE NO. 2019-CP-15-00285
)	
PATRICIA E. CAMPBELL,)	
)	
Plaintiff,)	
)	
-vs-)	ORDER QUIETING TITLE TO PROPERTY
)	
JOANNE AHEARN AND)	
ROBERT J. PLUM,)	
)	
Defendants,)	
)	
)	

This is a matter initiated by the Plaintiff herein by a Summons and Complaint filed in the Office of the Clerk of Court for Colleton County on April 11, 2019.

The Defendants were served by publication in The Colletonian on April 25, 2019, May 2, 2019 and May 9, 2019. The Defendants did not file any responsive pleadings and an Affidavit of Default was filed with the Court on July 1, 2019.

This matter comes before the undersigned, pursuant to an Amended Order of Reference filed August 26, 2019, which granted unto the undersigned Special Referee the authority to make a final determination in this matter based upon the pleadings filed and the testimony presented.

FINDINGS OF FACT

The Plaintiff is citizen and resident of the County of Colleton, State of South Carolina.

That the Defendants' residency is unknown.

That the real property which is the subject of this lawsuit is located in Colleton County, South Carolina and is described as follows:

All that certain piece, parcel or tract of land located in Colleton County, South Carolina, containing three (3) acres, more or less, and being measuring and bounded as reference to the plat prepared by W. Gene Whetsell, RLS, and recorded in Plat Book 25 at Page 50 in the Colleton County RMC Office will more fully show.
TMS#168-00-00-056

The said tract is hereinafter referred to as the "Property".

This Court has subject matter jurisdiction over this action and venue is proper in Colleton County, South Carolina.

That on or about December 18, 2018 the Plaintiff executed a general warranty deed transferring the Property to her daughter, Joanne Ahearn, and her daughter's boyfriend, Robert J. Plum as shown on the Title to Real Estate that was filed with the Colleton County Register of Deeds Office on the same date in Book 2702 at Page 271.

At all times hereto the Plaintiff was under duress and lacked the mental capacity to lawfully make the transaction complained of herein.

The Plaintiff made the conveyance complained of herein to the Defendants as a result of the Defendants undue influence.

It is, therefore, ORDERED:

That the Deed recorded in the Colleton County Register of Deeds Office on December 18, 2018 in Book 2702 at Page 271 is hereby set aside and annulled.

That the Plaintiff is seized in fee simple of a good, marketable and indefeasible title to the property which is the subject of this action, herein the "Property," and that it is entitled to the quiet and peaceful possession of the Property, against any and all other persons whomsoever, including but not limited to the Defendants named herein, and all adverse claims to the Property which might

be asserted by the Defendants or any of them, or by anyone else, other than persons claiming by or through the Plaintiff, are hereby declared to be without any right whatsoever.

That the Title to the Property which is the subject of this suit be, and the same hereby is, quieted in the name of the Plaintiff.

That the undersigned Special Referee shall issue a Deed to the Plaintiff confirming title in the name of the Plaintiff to the Property which is the subject of this action and which is more fully described hereinabove.

AND IT IS SO ORDERED.

Walterboro, South Carolina

7th day of September, 2019


Kenneth A. Campbell, Jr., Special Referee

PATRICIA??E??CAMPBELL??

JOANNE AHEARN AND ROBERT J. PLUM

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: Benjamin??CP??Sapp	Attorney for : <input checked="" type="checkbox"/> Plaintiff	<input type="checkbox"/> Defendant
	or	
	<input type="checkbox"/> Self-Represented Litigant	

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled); Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded; Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk : _____

INFORMATION FOR THE JUDGMENT INDEX		
Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.		
Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
Patricia??E??Campbell	Joanne Ahearn and Robert J. Plum	SNA
		\$
		\$
If applicable, describe the property, including tax map information and address, referenced in the order: Colleton??County??TMS19?? ???? ????, Turner Lane		

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest

STATE OF SOUTH CAROLINA)
COUNTY OF COLLETON)
PATRICIA E. CAMPBELL,)
Plaintiff,)
-vs-)
JOANNE AHEARN AND)
ROBERT J. PLUM,)
Defendant,)

IN COURT OF COMMON PLEAS

CASE NO. 2019-CP-15-00285

AFFIDAVIT OF DEFAULT

PERSONALLY appeared before me Benjamin C.P. Sapp, who being duly sworn says:

1. I am the attorney for the Plaintiff in the above entitled action.

2. The above entitled action was commenced by filing of a Summons and Complaint on April 11, 2019 in the Office of the Clerk of Court for Colleton County.

3. The Defendants, Joanne Ahearn and Robert J. Plum, were served by publication on April 25, 2019, May 2, 2019 and May 9, 2019.

4. No Answer or motions have been received or served as required by the Summons herein for or on behalf of the Defendant and the time for responding has now expired and said Defendant above named are in default.

Walterboro, South Carolina

1st day of July, 2019

s/Benjamin C.P. Sapp
Benjamin C.P. Sapp, Attorney for the Plaintiff
Sapp Law Firm
Post Office Box 258
Walterboro, South Carolina 29488
(843) 549-5923
(843) 549-3269 Facsimile

The Colletonian

The State of South Carolina
County of Colleton

In re: Summons
Case # 2019-CP-15-00285
Patricia E. Campbell vs Joanne Ahearn

Before me personally appeared Mandy Hathcock who, being duly sworn, says that she is the Publisher of *The Colletonian* a newspaper published in Walterboro, in the county and state aforesaid; that the following Notice of which the attached is a clipping and correct copy, was published in the said newspaper, in its issue(s) of Publication dates:

04/25/19

05/02/19

05/09/19

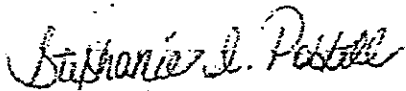
AFFIDAVIT OF PUBLICATION:

THE COURT OF COMMON PLEAS
COUNTY OF COLLETON CASE
NO. 2019-CP-15-00285 PATRICIA E.
CAMPBELL, Plaintiff
vs. JOANNE AHEARN AND ROBERT
PLUM, Defendants TO THE
DEFENDANTS ABOVE NAMED
YOU ARE HEREBY SUMMONED and
required to answer the Complaint herein,
a copy of which is herewith served upon
you, and to serve a copy of your Answer
to said Complaint upon the subscriber of
his office, 125 Jefferson Blvd., Walterboro,
South Carolina within thirty (30) days
after service hereof, exclusive of the day
of such service, and if you fail to answer
the Complaint within the time aforesaid,
the Plaintiff in this action will apply to
the Court for the relief demanded in said
Complaint. YOU WILL ALSO TAKE
NOTICE that should you fail to answer
the foregoing Summons the Plaintiff will
move for a general Order of Reference
of cause to the Master in Equity or
Special Referee for this County, which
Order shall, pursuant to Rule 53(G) of the
South Carolina Rules of Civil Procedure,
specifically provide that the Master in
Equity or Special Referee is authorized
and empowered to enter a final judgment
in this case with any appeal to be
direct to the Supreme Court of South
Carolina, Walterboro, South Carolina s/
Benjamin C.P. Sapp 10th day of April,
2019 Benjamin C.P. Sapp, Attorney for
the Plaintiff, Sapp Law Firm Post Office
Box 258 Walterboro, South Carolina
29488 (843) 549-5923 (843) 549-3269
Facsimile
05/09/19

SWORN to before me this ___16th

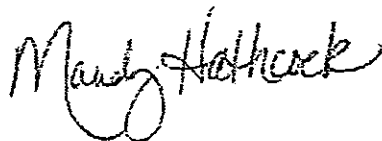
Day of May _____, 2019

(SEAL)



Printed Name: Stephanie L. Postell

Commission Expiring on 01/18/23
Notary Public in and of South Carolina



Mandy Hathcock, Publisher/Owner
The Colletonian
111-A, East Washington St.
Walterboro, S.C. 29488
843-782-3477

The Colletonian

The State of South Carolina
County of Colleton

In re: Summons
Case # 2019-CP-15-00285
Patricia E. Campbell vs Joanne Ahearn

Before me personally appeared Mandy Hathcock who, being duly sworn, says that she is the Publisher of *The Colletonian* a newspaper published in Walterboro, in the county and state aforesaid; that the following Notice of which the attached is a clipping and correct copy, was published in the said newspaper, in its issue(s) of Publication dates:

04/25/19

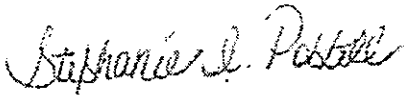
05/02/19

05/09/19

SWORN to before me this ___16th

Day of _May_ , 2019

(SEAL)



Printed Name: Stephanie L. Postell

Commission Expiring on 01/18/23
Notary Public in and of South Carolina



Mandy Hathcock, Publisher/Owner
The Colletonian
111-A, East Washington St.
Walterboro, S.C. 29488
843-782-3477

AFFIDAVIT OF PUBLICATION:

THE COURT OF COMMON PLEAS
COUNTY OF COLLETON CASE
NO. 2019-CP-15-00285 PATRICIA E.
CAMPBELL, Plaintiff,
-vs- JOANNE AHEARN AND ROBERT
J. PLUM, Defendants; TO THE
DEFENDANTS ABOVE NAMED:
YOU ARE HEREBY SUMMONED and
required to answer the Complaint herein,
a copy of which is herewith served upon
you, and to serve a copy of your Answer
to said Complaint upon the subscriber at
his office, 123 Jetties Blvd., Walterboro,
South Carolina within thirty (30) days
after service hereof, exclusive of the day
of such service, and if you fail to answer
the Complaint within the time aforesaid,
the Plaintiff in this action will apply to
the Court for the relief demanded in said
Complaint. YOU WILL ALSO TAKE
NOTICE that should you fail to answer
the foregoing Summons the Plaintiff will
move for a general Order of Reference
of cause to the Master -In-Equity or
Special Referee for this County, which
Order shall, pursuant to Rule 53(3) of the
South Carolina Rules of Civil Procedure,
specifically provide that the Master-In-
Equity or Special Referee is authorized
and empowered to enter a final judgment
in this case with any appeal to be
direct to the Supreme Court of South
Carolina, Walterboro, South Carolina s/
Benjamin C.P. Sapp 10th day of April,
2019 Benjamin C.P. Sapp, Attorney for
the Plaintiff Sapp Law Firm Post Office
Box 258 Walterboro, South Carolina,
29488 (843) 549-3923 (843) 549-3269
Facsimile
05/09/19

ELECTRONICALLY FILED - 2019 May 22 10:33 AM - COLLETON - COMMON PLEAS - CASE#2019CP1500285

April 10, 2019

SUMMONS

April 10, 2019

COMPLAINT

Defendant's Exhibit 1

HEALTH CARE POWER OF ATTORNEY

Defendant's Exhibit 2

TITLE TO REAL ESTATE

Defendant's Exhibit 3

Last Will and Testament

Of

Patricia E. Campbell

transferring the Property to her daughter, Joanne Ahearn, and her daughter's boyfriend, Robert J. Plum as shown on the Title to Real Estate that was filed with the Colleton County Register of Deeds Office on the same date in Book 2702 at Page 271.

6. At all times hereto the Plaintiff was under duress and lacked the mental capacity to lawfully make the transaction complained of herein.

7. The Plaintiff made the conveyance complained of herein to the Defendants as a result of the Defendants undue influence.

8. As a result of the Plaintiff's lack of capacity and/or Defendants actions, the Plaintiff is entitled to an order setting aside and annulling the conveyance of real estate complained of herein.

WHEREFORE, Plaintiff prays that this Court:

(a) Issue an order setting aside and annulling the conveyance recorded with the Colleton County Register of Deeds Office on December 18, 2018 in Book 2702 at Page 271.

(b) Issue an order requiring that the Defendants pay reasonable attorney's fees and costs to the Plaintiff's attorney along with such and further relief as the Court deems necessary.

Walterboro, South Carolina

10th day of April, 2019

s/Benjamin C.P. Sapp
Benjamin C.P. Sapp, Attorney for the Plaintiff
Sapp Law Firm
Post Office Box 258
Walterboro, South Carolina, 29488
(843) 549-5923
(843) 549-3269 Facsimile

STATE OF SOUTH CAROLINA

HEALTH CARE POWER OF ATTORNEY

COUNTY OF COLLETON

I, Patricia E. Campbell of 331 Turner Lane, Round O, South Carolina, do hereby appoint Joanne Ahearn of 335 Turner Lane, Round O, South Carolina, Telephone Number: 843-603-0566 as my agent to make health care decisions for me as authorized in this document.

2. EFFECTIVE DATE AND DURABILITY

By this document, I intend to create a durable power of attorney effective upon, and only during, any period of mental incompetence.

3. AGENT'S POWERS

I GRANT TO MY AGENT FULL AUTHORITY TO MAKE DECISIONS FOR ME REGARDING MY HEALTH CARE. In exercising this authority, my agent shall follow my desires as stated in this document or otherwise expressed by me or known to my agent. In making any decision, my agent shall attempt to discuss the proposed decision with me to determine my desires if I am able to communicate in any way. If my agent cannot determine the choice I would want made, then my agent shall make a choice for me based upon what my agent believes to be in my best interests. My agent's authority to interpret my desires is intended to be as broad as possible, except for any limitations I may state below.

Accordingly, unless specifically limited by Section E, below, my agent is authorized as follows:

- A. To consent, refuse, or withdraw consent to any and all types of medical care, treatment, surgical procedures, diagnostic procedures, medication and the use of mechanical or other procedures that affect any bodily function, including but not limited to, artificial respiration, nutritional support and hydration, and cardiopulmonary resuscitation;
- B. To authorize, or refuse to authorize, any medication or procedure intended to relieve pain, even though such may lead to physical damage, addiction, or hasten the moment of, but not intentionally cause, my death;
- C. To authorize my admission to or discharge, even against medical advice, from any hospital, nursing care facility, or similar facility or service;

PEC

- D. To take any other action necessary to making, documenting, and assuring implementation of decisions concerning my health care, including, but not limited to, granting and waiver or release from liability required by any hospital, physician, nursing care provider, or other health care provider; signing any documents relating to refusals of treatment or the leaving of a facility against medical advice, and pursuing any legal action in my name, and at the expense of my estate to force compliance with my wishes as determined by my agent or to seek actual or punitive damages for the failure to comply.
- E. The powers granted above do not include the following powers or are subject to the following rules or limitations: NONE

4. ORGAN DONATION

My agents may PEC; may not _____ consent to the donation of all or any of my tissue or organs for purposes of transplantation.

5. EFFECT ON DECLARATION OF A DESIRE FOR A NATURAL DEATH (LIVING WILL)

I understand that if I have a valid Declaration of a Desire for a Natural Death, the instructions contained in the Declaration will be given effect in any situation to which they are applicable. My agents will have authority to make decisions concerning my health care only in situations to which the Declaration does not apply.

6. STATEMENT OF DESIRES AND SPECIAL PROVISIONS

With respect to any Life-Sustaining Treatment, I direct the following:

1. PEC GRANT OF DISCRETION TO AGENTS. I do not want my life to be prolonged nor do I want life-sustaining treatment to be provided or continued if my agents believe the burdens of the treatment outweigh the expected benefits. I want my agents to consider the relief of suffering, my personal beliefs, the expense involved and the quality as well as the possible extension of my life in making decisions concerning life-sustaining treatment.

OR

2. _____ DIRECTIVE TO WITHHOLD OR WITHDRAW TREATMENT. I do not want my life to be prolonged and I do not want life-sustaining treatment:
- A. If I have a condition that is incurable or irreversible and, without the administration of life-sustaining procedures, expected to result in death within a relatively short period of time; or

J PEC

B. If I am in a state of permanent unconsciousness.

OR

3. _____ DIRECTIVE FOR MAXIMUM TREATMENT. I want my life to be prolonged to the greatest extent possible, within the standards of accepted medical practice, without regard to my condition, the chances I have for recovery, or the cost of the procedures.

OR

4. _____ DIRECTIVE IN MY OWN WORDS. _____

7. STATEMENT OF DESIRES REGARDING TUBE FEEDING

With respect to Nutrition and Hydration provided by means of a nasogastric tube or tube into the stomach, intestines, or veins, I wish to make clear that:

DEC I do not want to receive these forms of artificial nutrition and hydration, and they may be withheld or withdrawn under the conditions given above.

OR

_____ I do want to receive these forms of artificial nutrition and hydration.

IF YOU DO NOT INITIAL EITHER OF THE ABOVE STATEMENTS, YOUR AGENTS WILL NOT HAVE AUTHORITY TO DIRECT THAT NUTRITION AND HYDRATION NECESSARY FOR COMFORT, CARE OR ALLEVIATION OF PAIN BE WITHDRAWN.

8. ADMINISTRATIVE PROVISIONS

- A. I revoke any prior Health Care Power of Attorney and any provisions relating to health care of any other prior power of attorney.
- B. This power of attorney is intended to be valid in any jurisdiction in which it is presented.

3 DEC

8. SUCCESSOR AGENT

In the event that my daughter Joanne Ahearn is unable or unwilling to serve, then and in that event I nominate, constitute and appoint Robert J. Plum as my agent to take care of my health care decisions. His address is 418 Falcon Avenue, Edgewater, Florida 32141, Telephone Number: 386-402-5268.

9. UNAVAILABILITY OF AGENT

If, at any relevant time the agents named herein are unable or unwilling to make decisions concerning my health care, and those decisions are to be made by a guardian, by the Probate Court, or by a surrogate pursuant to the Adult Health Care Consent Act, it is my intention that the guardian, Probate Court, or surrogate make those decisions in accordance with my directions as stated in this document.

BY SIGNING HERE, I INDICATE THAT I UNDERSTAND THE CONTENTS OF THIS DOCUMENT AND THE EFFECT OF THIS GRANT OF POWERS TO MY AGENT.

I SIGN MY NAME TO THIS HEALTH CARE POWER OF ATTORNEY ON THE 18th DAY OF DECEMBER 2018. My current home address is 331 Turner Lane Round O, South Carolina.

Signature: Patricia E. Campbell

Name: Patricia E. Campbell

4/PEC

I declare, on the basis of information and belief, that the person who signed or acknowledged this document (the principal) is personally known to me, that she signed or acknowledged this Health Care Power of Attorney in my presence, and that she appears to be of sound mind and under no duress, fraud, or undue influence. I am not related to the principal by blood, marriage, or adoption, either as a spouse, a lineal ancestor, descendant of the parents of the principal, or spouse of any of them. I am not directly financially responsible for the principal's medical care. I am not entitled to any portion of the principal's estate upon her decease, whether under any will or as an heir by intestate succession, nor am I the beneficiary of an insurance policy on the principal's life, nor do I have a claim against the principal's estate as of this time. I am not the principal's attending physician, nor an employee of the attending physician. No more than one witness is an employee of a health facility in which the principal is a patient. I am not appointed as Health Care Agent or Successor Health Care Agent by this document.

Witness No. 1

SIGNATURE

Deborah B. Kane

DATE 12-18-18

PRINT NAME

Deborah B. Kane

TELEPHONE (843) 549-1060

RESIDENCE ADDRESS

1832 CAVANAUGH ROAD

WALTERBORD, SC 29488

Witness No. 2

SIGNATURE

Sarah Kinard

DATE 12/18/18

PRINT NAME

Sarah Kinard

TELEPHONE 843-549-1060

RESIDENCE ADDRESS

112 Forest Hills Rd

Walterboro, SC 29488

5 PEC

EXHIBIT 2

COLLETON COUNTY ASSESSOR

Tax Map: 169-00-00-055

Date: 01/03/2019

RECORDS USE ONLY - GAD



201801232

DEED	
RECORDING FEES	\$10.00
STATE TAX	\$0.00
COUNTY TAX	\$0.00

PRESENTED & RECORDED: 12-19-2018 03:11:48 PM

BK: RB 2702

PG: 271 - 275

DEBORAH B BANE
ATTORNEY AT LAW

DEBORAH H. GUSLER
REGISTER OF DEEDS
COLLETON COUNTY, SC

STATE OF SOUTH CAROLINA)
) TITLE TO REAL ESTATE
 COUNTY OF COLLETON)

Know all men by these presents that, I, Patricia E. Campbell, for and in consideration of Five and 00/100 (\$5.00) Dollars, to me by my daughter and friend in hand paid at and before the sealing of these presents by *Patricia E. Campbell, Joanne Ahearn, and Robert J. Plunk*, in the State aforesaid, the receipt hereof is hereby acknowledged, have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release unto the said *Patricia E. Campbell, Joanne Ahearn, and Robert J. Plunk*, as joint tenants with the right of survivorship and not as tenants in common, their heirs and assigns, forever:

See Attached Exhibit A for legal descriptions

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises belonging, or in any wise incident or appertaining, TO HAVE AND TO HOLD, all singular, the said Premises before mentioned unto the said *Patricia E. Campbell, Joanne Ahearn, and Robert J. Plunk*, as joint tenants with the right of survivorship and not as tenants in common, their heirs and assigns, forever, in fee simple.

Grantees' 331 Turner Lane
 Address Round O, AC 29474

Exhibit A

All that certain piece, parcel or tract of land located in Colleton County, South Carolina, containing three (3) acres, more or less, and being measuring and bounded as reference to the plat prepared by W. Gene Whetsell, RLS, and recorded in Plat Book 25 at Page 50 in the Colleton County RMC Office will more fully show.

This being the same property conveyed to Clifford C. Campbell and Patricia E. Campbell, as joint tenants, with right of survivorship, by deed of Margaret Dianne Hill dated 25 July 2005 and recorded in Record Book 1124 at Page 174 in the Colleton County Register of Deeds Office. Clifford C. Campbell died 20 February 2015.

TMS#168-00-00-056.

STATE OF SOUTH CAROLINA)
COUNTY OF Colleton)

AFFIDAVIT FOR EXEMPT TRANSFERS

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on the back of this affidavit and I understand such information.
2. The property being transferred is located at _____,
bearing Colleton County Tax Map Number 168-00-00-056
was transferred by Patricia E. Campbell
to Patricia E. Campbell, Joanne Ahearn & Robert J. Plem
on 12/18/2018

3. The deed is exempt from the deed recording fee because (See information section of affidavit):
1 to myself and family

If exempt under exemption #14 as described in the information section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase the realty? Check Yes or No

4. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as:
Attorney for Grantee(s)

5. I understand that a person required to furnish this affidavit who wilfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

Deborah B. Kane

Responsible Person Connected with the Transaction

Deborah B. Kane
Print or Type Name Here

SWORN to and subscribed before me this
18th day of December 2018

Notary Public for South Carolina

My Commission Expires 03/29/2028

Notary (L.S.): Sarah Kinard

Notary (printed name): Sarah Kinard

INFORMATION

Except as provided in this paragraph, the term "value" means "the consideration paid or to be paid in money or money's worth for the realty." Consideration paid or to be paid in money's worth includes, but is not limited to, other realty, personal property, stocks, bonds, partnership interest and other intangible property, the forgiveness or cancellation of a debt, the assumption of a debt, and the surrendering of any right. The fair market value of the consideration must be used in calculating the consideration paid in money's worth. Taxpayers may elect to use the fair market value of the realty being transferred in determining fair market value of the consideration. In the case of realty transferred between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, and in the case of realty transferred to a trust or as a distribution to a trust beneficiary, "value" means the realty's fair market value. A deduction from value is allowed for the amount of any lien or encumbrance existing on the land, tenement, or realty before the transfer and remaining on the land, tenement, or realty after the transfer. (This includes, pursuant to Code Section 12-59-140(E)(6), any lien or encumbrance on realty in possession of a forfeited land commission which may subsequently be waived or reduced after the transfer under a signed contract or agreement between the lien holder and the buyer existing before the transfer.) Taxpayers may elect to use the fair market value for property tax purposes in determining fair market value under the provisions of the law.

Exempted from the fee are deeds:

- (1) transferring realty in which the value of the realty, as defined in Code Section 12-24-30, is equal to or less than one hundred dollars;
- (2) transferring realty to the federal government or to a state, its agencies and departments, and its political subdivisions, including school districts;
- (3) that are otherwise exempted under the laws and Constitution of this State or of the United States;
- (4) transferring realty in which no gain or loss is recognized by reason of Section 1041 of the Internal Revenue Code as defined in Section 12-6-40(A);
- (5) transferring realty in order to partition realty as long as no consideration is paid for the transfer other than the interests in the realty that are being exchanged in order to partition the realty;
- (6) transferring an individual grave space at a cemetery owned by a cemetery company licensed under Chapter 55 of Title 39;
- (7) that constitute a contract for the sale of timber to be cut;
- (8) transferring realty to a corporation, a partnership, or a trust as a stockholder, partner, or trust beneficiary of the entity or so as to become a stockholder, partner, or trust beneficiary of the entity as long as no consideration is paid for the transfer other than stock in the corporation, interest in the partnership, beneficiary interest in the trust, or the increase in value in the stock or interest held by the grantor. However, except for transfers from one family trust to another family trust without consideration or transfers from a trust established for the benefit of a religious organization to the religious organization, the transfer of realty from a corporation, a partnership, or a trust to a stockholder, partner, or trust beneficiary of the entity is subject to the fee, even if the realty is transferred to another corporation, a partnership, or trust;
- (9) transferring realty from a family partnership to a partner or from a family trust to a beneficiary, provided no consideration is paid for the transfer other than a reduction in the grantee's interest in the partnership or trust. A "family partnership" is a partnership whose partners are all members of the same family. A "family trust" is a trust, in which the beneficiaries are all members of the same family. The beneficiaries of a family trust may also include charitable entities. "Family" means the grantor and the grantor's spouse, parents, grandparents, sisters, brothers, children, stepchildren, grandchildren, and the spouses and lineal descendants of any of the above. A "charitable entity" means an entity which may receive deductible contributions under Section 170 of the Internal Revenue Code as defined in Section 12-6-40(A);
- (10) transferring realty in a statutory merger or consolidation from a constituent corporation to the continuing or new corporation;
- (11) transferring realty in a merger or consolidation from a constituent partnership to the continuing or new partnership;
- (12) that constitute a corrective deed or a quitclaim deed used to confirm title already vested in the grantee, provided that no consideration of any kind is paid or is to be paid under the corrective or quitclaim deed;
- (13) transferring realty subject to a mortgage to the mortgagee whether by a deed in lieu of foreclosure executed by the mortgagor or deed pursuant to foreclosure proceedings;
- (14) transferring realty from an agent to the agent's principal in which the realty was purchased with funds of the principal, provided that a notarized document is also filed with the deed that establishes the fact that the agent and principal relationship existed at the time of the original purchase as well as for the purpose of purchasing the realty; and
- (15) transferring title to facilities for transmitting electricity that is transferred, sold, or exchanged by electrical utilities, municipalities, electric cooperatives, or political subdivisions to a limited liability company which is subject to regulation under the Federal Power Act (16 U.S.C. Section 791(a)) and which is formed to operate or to take functional control of electric transmission assets as defined in the Federal Power Act.

**Last Will and Testament
Of
Patricia E. Campbell**

I, Patricia E. Campbell of 331 Turner Lane, Round O, South Carolina, being of sound and disposing mind and memory, and considering the uncertainty of this frail and transitory life, do hereby make, publish and declare this to be my Last Will and Testament hereby revoking any and all Wills or codicils heretofore made by me.

I.

I will and direct that all of my just debts, if any there be at the time of my death, be paid out of my estate, by my Personal Representative named, as soon as practicable after my death.

II.

I will, devise and bequeath all of my estate, whether real, personal or mixed, and wheresoever situate, to my daughter, Joanne Ahearn and her fiancé Robert J. Plum,, share and share alike, absolutely and in fee simple.

III.

I am specifically omitting my children Nanette Hill and Charles B. Ricci, Jr. from receiving any assets from my estate.

IV.

I hereby nominate, constitute and appoint Joanne Ahearn and Robert J. Plum as my joint Personal Representatives of this, my Last Will and Testament, to serve without bond. In the event that one is unable or unwilling to serve, then and in that event, the remaining individual may serve solely.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND SEAL THIS 18TH DAY OF DECEMBER 2018.

Patricia E. Campbell
Patricia E. Campbell

SIGNED, SEALED, PUBLISHED AND DECLARED BY Patricia E. Campbell to be her Last Will and Testament in the presence of us, who at her request and in her presence and in the presence of each other do hereunto set our hands as witnesses.

Deborah B Kane ADDRESS Walterboro, SC
Sanah Kinard ADDRESS Walterboro, SC

Defendant's Exhibit 4

COMPLAINT

Defendant's Exhibit 5

MOTION TO FILE RULE NO. 60(b)(3)

Defendant's Exhibit 6

TEXT MESSAGE

Defendant's Exhibit 7

RECORD OF HEARING

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF COLLETON)	CASE NO. 2019-CP-15-___
PATRICIA E. CAMPBELL,)	
)	
Plaintiff,)	
)	
-vs-)	COMPLAINT
)	
JOANNE AHEARN AND)	
ROBERT J. PLUM,)	
)	
Defendants,)	
)	

The Plaintiff, above named, would respectfully show unto the Court:

1. That the Plaintiff is a citizen and resident of the County of Colleton, State of South Carolina.
2. That the whereabouts of the Defendants are unknown.
3. The real property which is the subject of this lawsuit is located in Colleton County, South Carolina and is described as follows:

All that certain piece, parcel or tract of land located in Colleton County, South Carolina, containing three (3) acres, more or less, and being measuring and bounded as reference to the plat prepared by W. Gene Whetsell, RLS, and recorded in Plat Book 25 at Page 50 in the Colleton County RMC Office will more fully show.
TMS#168-00-00-056

The said tract is hereinafter referred to as the "Property".

4. This Court has both personal and subject matter jurisdiction and venue is proper in Colleton County, South Carolina.
5. On or about December 18, 2018 the Plaintiff executed a general warranty deed

transferring the Property to her daughter, Joanne Ahearn, and her daughter's boyfriend, Robert J. Plum as shown on the Title to Real Estate that was filed with the Colleton County Register of Deeds Office on the same date in Book 2702 at Page 271.

6. At all times hereto the Plaintiff was under duress and lacked the mental capacity to lawfully make the transaction complained of herein.

7. The Plaintiff made the conveyance complained of herein to the Defendants as a result of the Defendants undue influence.

8. As a result of the Plaintiff's lack of capacity and/or Defendants actions, the Plaintiff is entitled to an order setting aside and annulling the conveyance of real estate complained of herein.

WHEREFORE, Plaintiff prays that this Court:

(a) Issue an order setting aside and annulling the conveyance recorded with the Colleton County Register of Deeds Office on December 18, 2018 in Book 2702 at Page 271.

(b) Issue an order requiring that the Defendants pay reasonable attorney's fees and costs to the Plaintiff's attorney along with such and further relief as the Court deems necessary.

Walterboro, South Carolina

10th day of April, 2019

s/Benjamin C.P. Sapp
Benjamin C.P. Sapp, Attorney for the Plaintiff
Sapp Law Firm
Post Office Box 258
Walterboro, South Carolina, 29488
(843) 549-5923
(843) 549-3269 Facsimile

MOTION TO FILE RULE NO. 60(b)(3)

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM COLLETON COUNTY

Court of Common Pleas

Kenneth A. Campbell, Jr., Special Referee

Appellate Case No. 2019-001886

Patricia E. Campbell

Respondent.

V.

Joanne Ahearn and Robert J. Plum

Appellant.

MOTION TO FILE RULE NO. 60(b)(3)

DISCUSSION

I. RESPONDENTS PATRICIA E. CAMPBELLS UNEXCUSABLE NEGLIGENCE AND FRAUD

The Appellants Joanne Ahearn and Robert J. Plum are requesting the Appellate Court of South Carolina to grant permission appellants Joanne Ahearn And Robert J. Plum to file rule 60 (b)(3) with the 14th Judicial Court In Walterboro, South Carolina. The reason for requesting to file this rule, the appellants Joanne Ahearn and Robert J. Plum were not given service of process. The respondent, Patricia E. Campbell even though stating the appellants whereabouts were unknown, the respondent Patricia E. Campbell was in contact with the appellants Joanne Ahearn and Robert J. Plum prior to and after filing the lawsuit to remove the appellants Joanne Ahearn And Robert J. Plum from the respondents deeded property located at 331 Turner Lane, Round O, South Carolina, Colleton County, 29474. The respondent Patricia E. Campbell also claimed to be under duress and lacked the mental capacity to lawfully make the transaction, (Exhibit C). The respondent Patricia E. Campbell also claimed to make the transaction as a result of the appellants undue influence, (Exhibit C).

II. PRESENTATION OF FACTS

The respondent Patricia E. Campbell, executed General Warranty Deed on December 18, 2018, transferring the appellants Joanne Ahearn and Robert J. Plum as shown on the title to real estate that was filed with the Colleton County Register of Deeds on the same date in Book 2702 on page 271 (Exhibit A). The transfer and filing of the deed was performed by Attorney Deborah B. Kane O'Quinn. On the same date, respondent Patricia E. Campbell instructed Attorney Deborah B. Kane O'Quinn to name appellant Joanne Ahearn as the

respondent's primary healthcare power of attorney (exhibit B), and named appellant Robert J. Plum as successor healthcare power of attorney, (exhibit B). Within the respondent's complaint dated April 10, 2019 (exhibit C, page 1, number 2), the respondent Patricia E. Campbell claimed the whereabouts of the appellants Joanne Ahearn and Robert J. Plum were unknown, even though the appellants names, addresses and cell phone numbers were written in the healthcare power of attorney (exhibit B, page 1 lines 2 and 3, page 4 number 8 successor agent) dated December 18, 2018. The respondent Patricia E. Campbell declared she was of sound mind and under no duress, fraud or undue influence (exhibit B, page 5 line 4). Legal notices were placed in the Colletonian on April 25, 2019, May 2, 2019 and May 9, 2019, exhibit C), even though the respondent knew the appellants was not residing in the state of South Carolina, and were residing in the State of Florida, which the address was recorded in the healthcare power of attorney, (exhibit B). After the appellants filed the appeal in the South Carolina Court of Appeals, appellant Robert J. Plum received a disturbing text message from respondent Patricia E. Campbell, (exhibit D), proving once again the respondent and her attorney had the means to contact the appellants prior to filing.

SUMMARY

The appellants Joanne Ahearn and Robert J. Plum were not given service of process. The respondent Patricia E Campbell was in contact with the appellants Joanne Ahearn and Robert J. Plum prior to and after the respondent filed the lawsuit. The appellants possess text messages, (exhibit D), voicemails, healthcare power of attorney, (exhibit B), and successor healthcare power of attorney, (exhibit B), proving the respondent Patricia E. Campbell had means to contact the appellants Joanne Ahearn and Robert J. Plum. The respondent's attorney

Benjamin Cullifer Pickens Sapp made no attempt to use the preceding means to serve process on appellants Joanne Ahearn and Robert J. Plum.

CONCLUSION

For the foregoing reasons, the appellants Joanne Ahearn and Robert J. Plum respectfully ask the Appellate Court of South Carolina reverse or relieve the appellants Joanne Ahearn and Robert J. Plum from the September 7, 2019 order by Kenneth A. Campbell, Jr., Special Referee.

Respectfully submitted this 10th of January 2020

Joanne Ahearn

Robert J. Plum

504 Forest Circle, Apt. 123

Walterboro, South Carolina 29488

843-603-0566

386-416-9561

Pro Se

Joanne Ahearn 1-10-2020
Joanne Ahearn — Date

Robert J. Plum 1/10/2020
Robert J. Plum Date

AT&T 25% 11:43 AM

Details

Type: Text message

From: Patricia E. Campbell

Sent: Nov 7, 1:32 AM

CLOSE



Patricia E. C...

+1 843-599-0606



Nov 7



**you after I die
well I told her
I would like to
see it burn you
are acting like
the biggest
asshole walking
I should have
knowen.. all the
time you said**

1:32 AM

What are you

Enter message



Send



STATE OF SOUTH CAROLINA)
)
 COUNTY OF COLLETON)
)
 PATRICIA E. CAMPBELL,)
)
 Plaintiff,)
)
 -vs-)
)
 JOANNE AHEARN AND)
)
 ROBERT J. PLUM,)
)
 Defendants,)
)
)

IN THE COURT OF COMMON PLEAS
 CASE NO. 2019-CP-15-00285

RECORD OF HEARING

Pursuant to Order of Reference filed July 3, 2019, reference was held this 7th day of October, 2019 in the Office of Kenneth A. Campbell, Jr., Special Referee to hear the within case.

The hearing was held before Kenneth A. Campbell, Jr., Special Referee, and attended by the following: Benjamin C.P. Sapp, counsel for the Plaintiff.

WHEREUPON, COUNSEL FOR PLAINTIFF DOES HEREIN REPORT AS FOLLOWS:

I am an attorney for Plaintiff in this action and report upon information and belief and the best of my knowledge as follows:

The Summons and Complaint were filed with the Office of the Clerk of Court for Colleton County on April 11, 2019.

The Petition for Publication and an Affidavit for Publication were filed with the Office of the Clerk of Court for Colleton County on April 15, 2019.

An Order for Publication was signed by the Clerk of Court for Colleton County and filed on April 16, 2019. The Affidavit of Publication showing that the Defendants were served by publication in *The Colletonian* on April 25, 2019, May 2, 2019 and May 9, 2019 was filed with the Court on

May 22, 2019. An Affidavit of Default against the Defendants, Joanne Ahearn and Robert J. Plum, was filed with the Court on July 1, 2019.

The Order of Reference was filed on July 3, 2019 and the Amended Order of Reference was filed on August 26, 2019.

The Notice of Hearing was filed on September 18, 2019.

On or about December 18, 2018 the Plaintiff executed a general warranty deed transferring the Property to her daughter, Joanne Ahearn, and her daughter's boyfriend, Robert J. Plum as shown on the Title to Real Estate that was filed with the Colleton County Register of Deeds Office on the same date in Book 2702 at Page 271.

The Plaintiff was under duress and lacked the mental capacity to lawfully make the transaction complained of herein.

The Plaintiff made the conveyance to the Defendants as a result of the Defendants undue influence.

As a result of the Plaintiff's lack of capacity and/or Defendants actions, the Plaintiff is entitled to an order setting aside and annulling the conveyance of real estate complained of herein.

That any interest the Defendants may have in and to the Property should be extinguished and they should be barred from any future claims they may assert.

That the Plaintiff should be deemed the true and rightful owners of this property.

s/Benjamin C.P. Sapp
Benjamin C.P. Sapp, Attorney for the Plaintiffs

October 7, 2019

Defendant's Exhibit 8

ORDER QUIETING TITLE TO PROPERTY

Defendant's Exhibit 9

CONFORMATORY DEED

Defendant's Exhibit 10

PETITION FOR PUBLICATION

Certificate of Council

The undersigned hereby certifies that the Record on Appeal contains all material Proposed to be included by any of the parties and not any other material.

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF COLLETON)	CASE NO. 2019-CP-15-00285
)	
PATRICIA E. CAMPBELL,)	
)	
Plaintiff,)	
)	
-vs-)	ORDER QUIETING TITLE TO PROPERTY
)	
JOANNE AHEARN AND)	
ROBERT J. PLUM,)	
)	
Defendants,)	
)	
)	

This is a matter initiated by the Plaintiff herein by a Summons and Complaint filed in the Office of the Clerk of Court for Colleton County on April 11, 2019.

The Defendants were served by publication in The Colletonian on April 25, 2019, May 2, 2019 and May 9, 2019. The Defendants did not file any responsive pleadings and an Affidavit of Default was filed with the Court on July 1, 2019.

This matter comes before the undersigned, pursuant to an Amended Order of Reference filed August 26, 2019, which granted unto the undersigned Special Referee the authority to make a final determination in this matter based upon the pleadings filed and the testimony presented.

FINDINGS OF FACT

The Plaintiff is citizen and resident of the County of Colleton, State of South Carolina.

That the Defendants' residency is unknown.

That the real property which is the subject of this lawsuit is located in Colleton County, South Carolina and is described as follows:

All that certain piece, parcel or tract of land located in Colleton County, South Carolina, containing three (3) acres, more or less, and being measuring and bounded as reference to the plat prepared by W. Gene Whetsell, RLS, and recorded in Plat Book 25 at Page 50 in the Colleton County RMC Office will more fully show.
TMS#168-00-00-056

The said tract is hereinafter referred to as the "Property".

This Court has subject matter jurisdiction over this action and venue is proper in Colleton County, South Carolina.

That on or about December 18, 2018 the Plaintiff executed a general warranty deed transferring the Property to her daughter, Joanne Ahearn, and her daughter's boyfriend, Robert J. Plum as shown on the Title to Real Estate that was filed with the Colleton County Register of Deeds Office on the same date in Book 2702 at Page 271.

At all times hereto the Plaintiff was under duress and lacked the mental capacity to lawfully make the transaction complained of herein.

The Plaintiff made the conveyance complained of herein to the Defendants as a result of the Defendants undue influence.

It is, therefore, ORDERED:

That the Deed recorded in the Colleton County Register of Deeds Office on December 18, 2018 in Book 2702 at Page 271 is hereby set aside and annulled.

That the Plaintiff is seized in fee simple of a good, marketable and indefeasible title to the property which is the subject of this action, herein the "Property," and that it is entitled to the quiet and peaceful possession of the Property, against any and all other persons whomsoever, including but not limited to the Defendants named herein, and all adverse claims to the Property which might

be asserted by the Defendants or any of them, or by anyone else, other than persons claiming by or through the Plaintiff, are hereby declared to be without any right whatsoever.

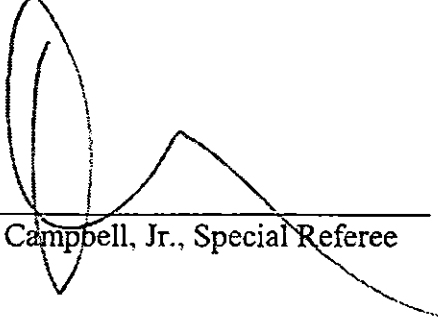
That the Title to the Property which is the subject of this suit be, and the same hereby is, quieted in the name of the Plaintiff.

That the undersigned Special Referee shall issue a Deed to the Plaintiff confirming title in the name of the Plaintiff to the Property which is the subject of this action and which is more fully described hereinabove.

AND IT IS SO ORDERED.

Walterboro, South Carolina

7th day of September, 2019


Kenneth A. Campbell, Jr., Special Referee



2019006535

DEED	
RECORDING FEES	\$15.00
STATE TAX	\$0.00
COUNTY TAX	\$0.00

PRESENTED & RECORDED: 10-09-2019 02:17 PM

BK: RB 2785

PG: 290 - 293

SAPPLAW FRS

DEBORAH H. GUSLER
REGISTER OF DEEDS
COLLETON COUNTY, SC

19-93

STATE OF SOUTH CAROLINA)
)
 COUNTY OF COLLETON)

CONFIRMATORY DEED

TO ALL WHOM THESE PRESENTS SHALL CONCERN:

I, Kenneth A. Campbell, Jr., as Special Referee for Colleton County, in the said State, send Greetings:

WHEREAS, in an action in the Court of Common Pleas for Colleton County between Patricia E. Campbell, Plaintiff vs. Joanne Ahearn and Robert J. Plum, Case Number 2019-CP-15-285, by an Order dated August 13, 2019 it was ordered that title to the property hereinafter described be confirmed in the Grantee named below and that a Confirmatory Deed from the Special Referee be issued to the said Grantee confirming title on the said terms and for the purposes mentioned in the Order granted in this case as by reference thereto will appear.

NOW THEREFORE, KNOW ALL MEN BY THESE PRESENTS, that I, Kenneth A. Campbell, Jr., as Special Referee for Colleton County, pursuant to the foregoing Order dated August 13, 2019, have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release unto Patricia E. Campbell, her heirs and assigns, 331 Tuner Lane, Round O, South Carolina 29474, the following described property:

All that certain piece, parcel or tract of land located in Colleton

County, South Carolina, containing three (3) acres, more or less, and being measuring and bounded as reference to the plat prepared by W. Gene Whetsell, RLS, and recorded in Plat Book 25 at Page 50 in the Colleton County RMC Office will more fully show.
TMS#168-00-00-056

Subject to all easements, restrictions and rights-of-way of record.

This being the same property conveyed to Patricia E. Campbell, Joanne Ahearn and Robert J. Plum by Deed of Patricia E. Campbell dated December 18, 2018 and recorded the same date in the Colleton County Register of Deeds Office in Book 2702 at Page 271:

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises belonging, or in anywise incident or appertaining, and the reversions and remainders, rents, issues, and profits thereof, and also any estate, right, title, interest, dower, possession, benefit, claim or demand therein whatsoever of all parties to the said suit and of all other persons who might rightfully claim the same or any part thereof, by, from, or under them, or either of them.

TO HAVE AND TO HOLD unto the said Patricia E. Campbell, her heirs and assigns forever.

IN WITNESS WHEREOF, I the said Special Referee, under and by virtue of said Order, have hereunto set my hand and seal this 7 day of October, in the year of our Lord two thousand nineteen and in the two hundred and forty-fourth year of the Sovereignty and Independence of the United States of America.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:

Macla D. Brunson

Witness

Kenneth A. Campbell, Jr., Special Referee

ML

Notary

STATE OF SOUTH CAROLINA)

COUNTY OF COLLETON)

ACKNOWLEDGMENT

The foregoing instrument was acknowledged before me this 17th day of October, 2019 by Kenneth A. Campbell, Jr., who is personally known to me, or who was proved to me on the basis of satisfactory evidence to be the person who executed the foregoing instrument.

ML

NOTARY PUBLIC FOR SOUTH CAROLINA
Print Name: Benjamin C.P. Sapp
My Commission Expires: 6/1/26



Enter in Grantor Index:
Prior owner of record:

1. Kenneth A. Campbell, Jr., Special Referee
2. Patricia E. Campbell, Joanne Ahearn and Robert J. Plum

March 23, 2021

Joanne Ahearn 3-24-2021

Joanne Ahearn Date

504 Forest Circle, Apt. 123

Walterboro, South Carolina, 29488

843-603-0566

Pro See

Robert J. Plum 3/24/2021

Robert J. Plum Date

504 Forest Circle, Apt. 123

Walterboro, South Carolina, 29488

843-603-0566

Pro See