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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2018-CP-28-00726

Appellate Case No. 2020-000063

In the Matter of: Almeter B. Robinson

Laverne Robinson,..... Appellant,

v.

Willene Brooks, Mary Greene, Ronnie Robinson, Almeter P. Harrison, Herbert Robinson, James Robinson, Leroy Robinson and Martha Aiken, ... Defendants,

Of Whom, Mary Greene, Ronnie Robinson, Almeter P. Harrison, Leroy Robinson and Martha Aiken are ..... Respondents.

BRIEF OF RESPONDENTS

Leonard R. Jordan, Jr., #3221
JORDAN LAW FIRM
211 Veterans Road, Suite D
Columbia, South Carolina 29209
(803) 726-1950 Tel
ljordan@ljordanlaw.com
Attorney for Respondent, Martha Aiken

Moultrie B. Burns, Jr., #1042
Savage, Royall & Sheehen, LLP
P.O. Drawer 10
Camden, South Carolina 29021
(803) 432-4391 Tel
mburns@thesavagefirm.com
Attorney for Respondents, Mary Greene, Ronnie Robinson, Almeter P. Harrison and Leroy Robinson

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STATEMENT OF ISSUES ON APPEAL

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STATEMENT OF THE CASE

Respondents accept the Statement of the Case in the Brief of Appellant.

STANDARD OF REVIEW

"An action to contest a will is an action at law, and in such cases reviewing courts will not disturb the probate court's findings of fact unless a review of the record discloses no evidence to support them." *Hairston v. McMillan*, 387 S.C. 439, 445, 692 S.E.2d 549, 552 (Ct.App. 2010).

STATEMENT OF THE FACTS

Respondents accept the Statement of the Facts in the Brief of Appellant EXCEPT as altered or supplemented by the following:

(a) Almeter B. Robinson (hereinafter "Almeter Robinson" or "Mrs. Robinson"), contrary to Appellant's claim, did not inherit any real property.

(b) The real properties mentioned in Almeter Robinson's Wills were owned as follows:

(i) The 10-acre tract (actually 10.76 acres) was never owned by Almeter Robinson. This tract was a part of a 41 acre tract acquired in 1981 by her son, James Robinson (hereinafter "James"), from Mary Boyd, and James deeded this tract to Ronnie Randolph Robinson and Leroy Robinson, Trustees, in 1993. (R.pp. 202-04)

(ii) Almeter Robinson acquired an undivided one-third (1/3) interest in the 8-acre tract by deed from Nathaniel Magazine, Trustee, and her undivided interest in this tract was deeded to James and Leroy Robinson, Trustees Under Trust Agreement dated November 29, 1985, in 1987. (R.pp. 205-07)

(iii) Almeter Robinson and Willie Robinson acquired title to the 4-acre tract from her father, Eugene Boyd, by two deeds. This tract was deeded to Martha Ann Robinson, as Trustee, in 1977. (R.p. 136, lines 10-16)

(c) In 1977-78, the house, which is located on the 4-acre tract, specifically Lot 2 of said tract, was constructed as a result of a collaboration between, and at the expense of, Mrs. Robinson's twin daughters, Martha Ann Robinson a/k/a Martha Aiken (hereinafter "Martha") and Mary Alice Robinson n/k/a Mary Greene (hereinafter "Mary"). (R.p. 91, line 22 – p. 92, line 2; p. 136, lines 5-9) The house was first occupied by Almeter Robinson in 1978, after Willie Robinson's death, and it was Mrs. Robinson's home until she died in 2017.

(d) According to the trust agreement, which supported the 1977 deed to Martha, as Trustee, the property would be held in trust for the benefit of the Donors, Almeter and Willie Robinson, during their lifetimes, that the trust would terminate at the death of the survivor of the life beneficiaries and that the trust property would be conveyed equally to: Martha, Mary, Ronnie Randolph Robinson (hereinafter "Ronnie") and Almeter Patricia Robinson Harrison (hereinafter "Patricia"). (R.p. 80, lines 3-7) There is no claim that the beneficial purpose of this Trust Agreement was not performed. Judge Branham found, in the Mediation Order Rule 5(b)(2)(B) SCRPC, filed on March 28, 2017, that the purpose of the Trust Agreement was served and "is no longer a consideration." (R.p. 17)

(e) With regard to the 4-acre tract, which included the house (Almeter Robinson's home), the tract was subdivided, and the individual lots were deeded by the following deeds:

(i) In 2002, Martha, as Trustee, conveyed to Ronnie Lot 3 (1.00 acre) and Lot 4 (1.18 acres). (R.p. 145)

(ii) In 2002, Martha, as Trustee, conveyed to Mary and Patricia an undivided 2/3 interest in Lots 1 and 2 (aggregate 2.02 acres). (R.pp. 129-130)

(iii) The said undivided 2/3 interest previously conveyed to Mary and Patricia was conveyed in 2004 to Martha (individually), with the intention that Martha have complete ownership of Lot 1 and Lot 2, which included the house. (The remaining undivided 1/3 interest was intended to be conveyed to Martha, but this conveyance was not accomplished until 2018. (R.p. 145, lines 11-25))

(iv) In 2004, Appellant received a deed to Lot 3 from Ronnie. (R.p. 91, lines 10-15) Appellant has owned, and exclusively possessed, Lot 3 since 2004, and he acknowledged paying taxes on the lot thereafter. (R.p. 79, lines 8-12)

(f) Appellant acknowledged that the aforesaid deeds are valid deeds. (R.pp. 81, line 24 – p. 82, line 2)

(g) Appellant acknowledged that, "the properties are owned or were titled of record in someone's name other than [his] mother's . . . [and that] at the time of her death she did not own these properties." (R.p. 86, lines 17-25)

(h) Appellant (the youngest child of Almeter Robinson) took over the care of Mrs. Robinson in May 2014, at which time he moved into the house, which he occupied with his mother until her death in 2017. Appellant resided with his mother during said period, and he became her primary caretaker, to the exclusion of all of her other children, including Martha, who, at all relevant times, was the sole owner of record of said house. (R.p. 76, lines 19-21; p. 137, lines 9-10; p. 143, line 18 – p. 144, line 4)

(i) Appellant (himself) drew up a Durable Power of Attorney, appointing himself as Almeter Robinson's attorney-in-fact; and on August 22, 2014, he took Mrs. Robinson to a law firm to execute the instrument. (R.p. 60, line 24 – p. 61, line 8) At least several of Appellant's siblings were unaware of this Power of Attorney. (R.p. 103, lines

12-21; p. 125, line 25 – p. 126, line 3; p. 134, lines 16-19)

(j) In or before February 2015, Appellant made an appointment with Deborah Butcher, Esquire, which resulted in the preparation of Almeter Robinson's 2015 Will (the subject Will). Mrs. Robinson, who was almost 87 years old at the time, already had a Will, which she had executed in 2009. (R.p. 178)

(k) Attorney Butcher initially drafted the Will upon Appellant's instructions. (R.p. 44, lines 4-7)

(l) As found by Judge Branham, ". . . Attorney Butcher testified that she could not recall whether or not she met with the decedent before the will execution or if her staff took the information and prepared the documents . . . and the will was prepared based upon the information provided to the attorney by the Plaintiff beneficiary" (i.e. Appellant). (R.pp. 4-5)

(m) Appellant admitted that he was present when the Will was signed by Almeter Robinson (R.p. 65, lines 16-19)

(n) The apparent purposes of the 2015 Will were to: (i) dispose of certain real property, which the testatrix (Almeter Robinson) no longer (or never) owned; (ii) bequeath the entirety of the residuary estate to Appellant; and (iii) designate Appellant as personal representative. (R.pp. 28-29)

(o) Attorney Butcher was unaware that Almeter Robinson owned none of the real properties identified in the 2015 Will. (R.p. 43) Appellant had full knowledge of the conveyances of the identified parcels to various children of Mrs. Robinson, including to himself. Although he knew that his mother owned no real property whatsoever, Appellant failed to inform Attorney Butcher of this important fact. When asked about this, Appellant

testified, "it wasn't my will, it was my mother's will . . . [and] [t]hat's not my job." (R.p. 65, line 20 – p. 66, line 6)

(p) If, as claimed by Appellant (in the FACTS portion of the Brief of Appellant), "it is apparent that Almeter B. Robinson believed that she was entitled to control the distribution of all three tracts," which she either had never owned or had not owned since 1987, it would, likewise, be apparent that her competency to execute a Will purporting to dispose of such properties should be questioned.

(q) In her 1994 and 2009 Wills, Almeter Robinson bequeathed her residuary estate to her children equally (R.pp. 179 and 183); and in her 2015 Will, which was prepared with Appellant's assistance, Mrs. Robinson bequeathed the entirety of her residuary estate to Appellant. (R.p. 29)

(r) In the 1994 and 2009 Wills, Almeter Robinson designated Mary (her daughter) as her Personal Representative; and in the 2015 Will, which, again, was prepared with Appellant's assistance, she designated Appellant as her Personal Representative. Mary was not mentioned at all in the 2015 Will. (R.pp. 183, 179 and 29)

ARGUMENTS

I. APPELLANT EXERTED UNDUE INFLUENCE OVER THE TESTATRIX.

A. According to *Russell v. Wachovia Bank, N.A.*, 353 S.C. 208, 222-23, 578 S.E.2d 329, 336-37 (2003), the following factors may prove useful "in determining whether undue influence was exerted over the testator:"

> **(1) Old age and physical and mental weakness . . .**
>
> **(2) The person signing the paper is in the home of the beneficiary and subject to his constant association and supervision . . .**

(3) Others have little or no opportunity to see [the testator] . . .

(4) The Will is different from and revokes a prior Will . . .

(5) It is made in favor of one with whom there are no ties of blood . . .

(6) It disinherits the natural objects of [the testator's] bounty . . .

(7) The beneficiary has procured its execution. . . .

When this list of factors is applied to the facts of this case, each factor (except factor (5)) is squarely applicable to describe the circumstances surrounding the subject Will and its procurement, as follows:

Old age and physical and mental weakness. Almeter Robinson was almost 87 years old. She was in poor physical health and required regular (24-hour) care. (R.p. 67, line 25 – p. 68, line 1) Mrs. Robinson had only an eighth-grade education. (R.p. 83, line 25) According to Patricia, her mother had dementia prior to executing the 2015 Will. (R.p. 133, lines 9-11) According to Leroy, his mother "was diagnosed with dementia and she was on dementia patches." (R.p. 98, line 20 – p. 99, line 3)

The person signing the paper is in the home of the beneficiary and subject to his constant association and supervision. Almeter Robinson resided with Appellant (the beneficiary to whom Mrs. Robinson bequeathed the entirety of her residuary estate and the person designated by Mrs. Robinson as her Personal Representative in the 2015 Will) exclusively beginning in May 2014 and continuing until her death in 2017. (R.p. 3)

Appellant often touted the Power of Attorney (prepared by him and signed by Almeter Robinson) as his authority to be the exclusive caretaker of his mother. (R.p. 76) Leroy testified that Appellant often used the Power of Attorney "as the means of taking control of the situation with the hospital and other matters." (R.p. 102, line 18 – p. 103, line 5)

Appellant's "control" even extended to overriding doctor's instructions for a nurse to regularly check on Mrs. Robinson. Mary testified that Appellant said, "Mama don't need no nurse;" and that, "a nurse never went to mama house . . [and] [w]hen mama was on her death bed and needed hospice, no hospice or nobody came to mama house. Mama just stayed locked up in the house and didn't get no kind of care." (R.p. 114, line 5 – p. 115, line 16)

Others have little or no opportunity to see [the testator]. Appellant restricted visitation and communication with Almeter Robinson by her other children. (R.p. 87, line 5 – p. 88, line 5; p. 94, line 16 – p. 95, line 1; p. 96, lines 1-12; p. 115, lines 18-25; p. 133, line 12; p. 134, lines 1-8; p. 138, lines 2-25; p. 139, lines 1-4) Appellant used threats, including threats of physical force, against family-members in order to demonstrate his complete control over his mother. (R.p. 96, line 13 – p. 97, line 1; p. 116, line 13 – p. 17, line 8; p. 141, line 8 – p. 142, line 1)

"Generally, in cases where a will has been set aside for undue influence, there has been evidence of threats, force, and/or restricted visitation, or an existing fiduciary relationship." *Russell v. Wachovia Bank, N.A.,* 353 S.C. 208, 217, 578 S.E.2d 329, 333 (2003).

Appellant demanded that his siblings obtain his permission before coming to visit their mother, and Appellant often called 9-1-1 and involved the police to intimidate certain of his siblings to refrain from interacting with their mother. On December 16, 2014, Appellant, upon returning home late, found his mother to be gone; and he called 9-1-1, claiming that Mary took Mrs. Robinson without his permission. It turns-out that the aide assigned to stay with Mrs. Robinson was sick, and that Mrs. Robinson would have been left alone if Mary had not taken her mother to her home. (R.p. 69, line 12 – p. 77, line 25)

Confrontations continued thereafter, with Appellant demanding that Mary leave their mother's home and calling the police. (R.p. 109, line 8 – p. 113, line 18) Appellant threatened

Mary, "you better not even come here again and get her without my permission." (R.p. 77, lines 13-25) Appellant also threatened Greg Aiken (Martha's husband): "Don't you ever come back to mama's house for nothing." (R.p. 141, line 18 – p. 142, line 1)

As found by Judge Branham: (a) Ronnie testified that, "Laverne changed everything;" (b) Leroy testified that, "He controlled her until the day she died;" and (c) Martha testified that Appellant "told her to call before she came to visit," and "he changed the locks on the house" (the house which she alone owned). (R.p. 3) Ronnie also testified that, when Laverne moved-in, his opportunities to visit changed altogether. (R.p. 87, lines 5-8) Leroy also testified that, after Laverne came, "I felt like my mom was in jail. When you would call there, wouldn't answer the calls. When you go there, wouldn't answer the door. And not only that, felt somewhat threatened to go there . . . he wouldn't allow me to be in the room when the doctor called in. He asked me to leave out when she was dying." (R.p. 95, line 3 – p. 96, line 12) Patricia also testified that Appellant's moving-in with Mrs. Robinson substantially impacted her ability to visit with her mother. (R.p. 130, line 9 – p. 131, line 7; p. 133, line 12 – p. 134, line 8)

The Will is different from and revokes a prior Will. The 2015 Will is remarkably different from, and expressly revokes, the two preceding Wills. Reference is made to the three Wills included in the Record. (R.pp. 28, 178 and 182) The primary differences have to do with the residuary estate and the designated personal representative. In her earlier Wills, Almeter Robinson bequeathed her residuary estate to her children equally (R.pp. 179 and 183); and in her 2015 Will, Mrs. Robinson bequeathed the entirety of her residuary estate to Appellant. (R.p. 29) In her earlier Wills, Almeter Robinson designated Mary as her Personal Representative; and in the 2015 Will, she designated Appellant as her Personal Representative.

It disinherits the natural objects of [the testator's] bounty. The 2009 Will left the rest

and residue of Almeter Robinson's estate equally to her nine (9) surviving children; and the 2015 Will left the entire rest and residue of the estate exclusively to Appellant. (R.pp. 29 and 179)

The beneficiary has procured its execution. Appellant arranged for the preparation of the 2015 Will, and he accompanied Mrs. Robinson to the attorney's office to execute the Will. (R.p. 42, lines 3-11) He also provided instructions to Attorney Butcher and withheld important information regarding property ownership from Ms. Butcher. (R.p. 43, line 9 – p. 44, line 7; p. 65, line 16 – p. 66, line 6) Judge Branham found that Appellant obtained copies of prior Wills of Mrs. Robinson and "gave this information to the Butcher Law Firm to draft the 2015 Will." (R.p. 4)

The 2015 Will does not mention Mary at all. Importantly, Appellant and Mary were often at odds. Appellant testified, "Mary's been a real pain in my butt trying to take care of my mom." (R.p. 71) Mary testified at length regarding her and her husband's confrontations with Appellant, which involved Appellant calling the police and threatening Mary's husband and Leroy. (R.p. 105, line 1 – p. 117, line 8)

The confrontation between Mary and Appellant, which took place on December 16, 2014 (see page 7, *supra*), was less than two months prior to the execution of the 2015 Will. Mary was unaware that she has been excluded from the 2015 Will; and she believed that Appellant (not her mother) excluded her. (R.p. 118, line 5 – p. 122, line 4; p. 127, lines 4-12) Again, Mary was the person whom Mrs. Robinson entrusted to handle her estate in her previous Wills, and the 2015 Will (orchestrated by Appellant) fails to even mention Mary. Appellant failed to explain this circumstance.

B. The Honorable Debra B. Branham, Kershaw County Probate Judge, properly concluded that Appellant "had total control of his mother's person . . . [from] May of 2014 until her death." (R.p. 3) She further concluded that Appellant "did not deny that he was 'basically out

to have all the control that you can possibly have.' His response was 'I took care of my mom.'" (R.p. 3)

Judge Branham also properly concluded that the Power of Attorney (executed by Almeter Robinson, which was prepared by Appellant and appointed him as agent) "coupled with the fact that he was the primary caretaker of his mother from May of 2014 up to her death, shows the Court that a confidential and fiduciary relationship did exist between the Plaintiff, a beneficiary, and the decedent." (R.p. 4).

Judge Branham also properly concluded, "based upon all the testimony presented including the testimony of the Plaintiff beneficiary, the Plaintiff beneficiary had total control of his mother's person, excluding or limiting his siblings' visitation and communications with the decedent from the time he moved in with his mother in May or 2014 until her death." (R.p. 3)

Appellant appealed Judge Branham's Order to the circuit court; and following a hearing, the Honorable Robert E. Hood, Judge, Court of Common Pleas for Kershaw County, affirmed, in all respects, Judge Branham's Order. Judge Hood specifically found that Judge Branham "considered the facts of undue influence . . . [and] found that Respondents produced sufficient evidence to support a finding of undue influence by Appellant." (R.p. 12)

II. WHO HAS THE BURDEN OF PROOF ON THE ISSUE OF UNDUE INFLUENCE?

A. Presumption of Undue Influence

"[W]hen there is a confidential relationship, a presumption of undue influence arises, and "the proponents of the will must offer evidence in rebuttal." *Lee v. Locklear* (*In re Estate of Anderson*), 381 S.C. 568, 574, 614, S.E.2d 176, 180 (Ct. App. 2009).

"The party seeking to challenge a will on the basis of undue influence must present evidence which 'unmistakenly and convincingly shows the party's will was overborne by the

defendant or someone acting on his behalf.' However, the existence of a confidential relationship creates a presumption that the instrument is invalid, and the burden then shifts to the proponent of the instrument to affirmatively show the absence of undue influence." *Id.*

"The contestants continue to bear the burden of proof throughout the will contest. In determining whether the contestants sustained such burden, the evidence has to be viewed in the light most favorable to the contestants." *Id.* (emphasis added)

Judge Branham properly found that, because a confidential relationship existed, "the burden of proof rebutting undue influence falls on the beneficiary." (R.p. 4) As commonly used, the word "rebutting" means taking away something or overcoming a presumption. Judge Branham's finding placed on Appellant the burden of countering prior evidence of undue influence. Judge Branham then found that "the burden to rebut undue influence was not met." (R.p. 4)

Judge Hood agreed, finding that Judge Branham's Order "also thoroughly explained Judge Branham's conclusions that, by virtue of his confidential relationship with the testatrix (which raised a presumption of undue influence, which presumption was uncontested), Appellant had the burden to rebut undue influence and that such burden to rebut was not met." (R.p. 12)

B. Even Ignoring the Presumption, Undue Influence was Proved by Respondents.

Appellant, by his argument that, "the presumption of undue influence arising from the grant of a power of attorney shifts to the proponent of a will [Appellant] the burden of going forward to present evidence to rebut the presumption, but does not shift the burden of proof," seems to suggest that the proof of undue influence in this case is a close-call and falls on the fact that Appellant was named as Mrs. Robinson's attorney-in-fact (agent). That is not the case. As indicated herein and in the separate Orders issued by Judge Branham and Judge Hood, the evidence of Appellant's

exercise of undue influence is quite persuasive and sufficient, even ignoring the presumption, to invalidate the subject Will.

Judge Hood specifically found that, "S.C. Code Ann. §62-3-407 states that the burden of establishing undue influence is on the contestants of a Will. Although this statute is not specifically cited in her Order, Judge Branham's detailed evaluation of the circumstances of the 2015 Will shows that she not only considered the facts of undue influence presented by Respondents but that she found that Respondents produced sufficient evidence to support a finding of undue influence by Appellant." (R.pp. 11-12) (emphasis added)

Judge Hood further found that, "Judge Branham made a finding of undue influence upon the testamentary act based on factors including: Appellant's control of his mother's person, his control of the information provided to (and withheld from) the Will preparer, his presence at the execution of the Will and the significant changes the Will made to his mother's estate plan. . . [and that] Judge Branham's decision that Appellant failed to meet the burden of overcoming the presumption of undue influence was supported by the evidence and was within the Judge's discretion."[1] (R.p. 9)

Judge Branham ruled that the change of the disposition of the rest and residue of the estate to only Appellant is "an unjust distribution" (R.p. 3). By her ruling, Judge Branham is not substituting her judgment for that of Mrs. Robinson. Instead, she is identifying a factual circumstance supporting Respondents' argument of undue influence, which "stood out with the Court." (R.p. 3)

There are, primarily, two significant changes between the 2009 Will and the 2015 Will.

[1] This quote came from Judge Hood's initial Order, which was amended by his Amended Order Affirming Probate Court Order) (R.p. 11).

The 2009 Will left the rest and residue of Almeter Robinson's estate equally to her surviving children and named Mary as the Personal Representative. (Mary had also been designated as Personal Representative in the Will executed by Almeter Robinson in 1994.) The 2015 Will left the rest and residue of the estate exclusively to Appellant and named Appellant as Personal Representative. Importantly, the 2015 Will does not even mention Mary, with whom Appellant was often bickering. (R.p. 71)

Appellant provided to Attorney Butcher the 1994 and 2009 Wills executed by Almeter Robinson (R.p. 42), and he led (or left) Ms. Butcher to believe that Mrs. Robinson owned several tracts of real property and had the right to dispose of these properties by the 2015 Will. (R.p. 43) Judge Branham found that ". . . Attorney Butcher testified that she would not have prepared the 2015 Will if she had known that the property was in trust . . . [and that,] as a fiduciary, the Plaintiff beneficiary [i.e. Appellant] had a duty to disclose this information to Attorney Butcher which could have revealed more information to Attorney Butcher who testified that she would not have prepared a will had she known." (R.p. 5)

The information provided to Attorney Butcher about these tracts of real property (as set forth in the previous Wills) was erroneous, and Appellant knew that it was erroneous. (R.p. 65, line 20 – p. 66, line 6) Appellant failed to disclose correct information to Ms. Butcher, and this failure led Ms. Butcher to draft a Will, which attempted a disposition of real property which was both illogical and impractical.

Judge Branham did not shift the ultimate burden of proof on the issue of undue influence to Appellant, and Respondents, in fact, satisfied the burden of proof by unmistakable and convincing evidence. Although both judges concluded that Appellant failed to satisfy the burden to rebut the presumption of undue influence, this point can be considered moot, as Respondents

met their burden of proof on the issue of undue influence, convincingly showing that Appellant exerted undue influence over Mrs. Robinson, which improperly affected her judgment and will when performing her testamentary act.

CONCLUSION

Appellant unquestionably had a confidential relationship with his mother, and he failed to rebut the presumption of undue influence; but even ignoring this presumption, Respondents made a compelling case that Appellant exerted undue influence over his mother. Respondents produced a higher quantum of evidence on that issue than did Appellant.

Judge Branham's Order, which she herself prepared, reflects that she thoroughly considered all the evidence and properly applied the law, concluding that, "based upon all of the testimony presented including testimony of the Plaintiff beneficiary, the Plaintiff beneficiary had **total control** of his mother's person . . . . " (R.p. 3) (emphasis added). Judge Hood agreed whole-heartedly with Judge Branham's findings and conclusions.

Judge Branham's Order and the subsequent Order of Judge Hood should be affirmed.

Respectfully submitted,

s/Leonard R. Jordan, Jr.
Leonard R. Jordan, Jr., #3221
JORDAN LAW FIRM
211 Veterans Road, Suite D
Columbia, South Carolina 29209
(803) 726-1950 Tel
ljordan@ljordanlaw.com
Attorney for Respondent, Martha Aiken

Columbia, South Carolina
March 23, 2021

s/Moultrie B. Burns, Jr.
Moultrie B. Burns, Jr., #1042
Savage, Royall & Sheehen, LLP
P.O. Drawer 10
Camden, South Carolina 29021
(803) 432-4391 Tel
mburns@thesavagefirm.com
Attorney for Respondents, Mary Greene, Ronnie Robinson, Almeter P. Harrison, Leroy Robinson

Camden, South Carolina
March 23, 2021