

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF \_\_\_\_\_ )

The South Carolina Court of Appeals  
**RECEIVED**  
Mar 12 2021  
CERTIFICATE OF SERVICE  
SC Court of Appeals

Edward Mays and Corrine Mays )  
Respondent )  
vs. )  
Irene L. Myers )  
Appellant. )

Case No.: 2021 - 000230

I certify that on this date, I served a copy of Notice of Appeal in this action, dated

February 26, 2021, on James C. Campbell, Clerk of Court 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:

James C. Campbell, Clerk of Court of Common Pleas  
215 North Harvin Street, Sumter, SC 29150 ;

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

SCRCP, addressed as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ ; or,

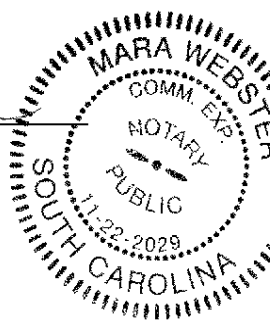
- Other:

State of South Carolina  
County of Sumter  
sworn to and subscribed before me on  
the 12 day of March, 2021  
Mara Webster  
Notary Public's Signature  
My Commission Expires 11-22-2021

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

March 12, 2021  
Date

Irene Myers  
Signature



93916

**RECEIVED**

FEB 26 2021

**SC Court of Appeals**

**FORM 1**

**NOTICE OF APPEAL IN A CIVIL CASE**

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.

RECORDED  
2021 MAR 12 PM 4:35  
JAMES C. CAMPBELL  
CLERK OF COURT  
SUMTER COUNTY, S.C.

**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:

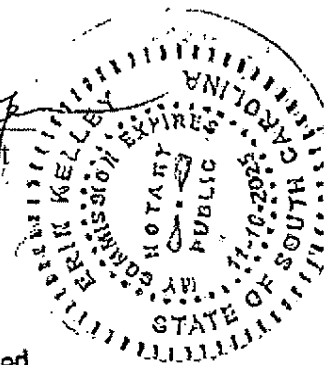
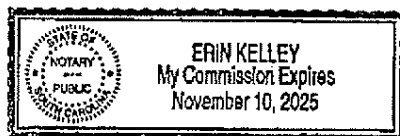
1. The Court, Master In Equity, did not apply the applicable law within this case, in that, South Carolina's "Mistaken Belief Rule" as applicable to boundary disputes between two adjoining land owners was ignored and the matter was treated as an ordinary variety adverse possession claim.

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