

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 30 2021

APPEAL from Court of Common Pleas of CHARLESTON COUNTY

SC Court of Appeals

Capers G. Barr, III, Special Referee

Appellate Case No. 2021-000185

Case No. 2019-CP-10-03042

Judith A. Brown, as Personal Representative for the Estate of Mildred C. Knight, and
Norman R. "Bobby" Knight III,.....Appellants

v.

Chloe Knight Tonney,.....Respondent

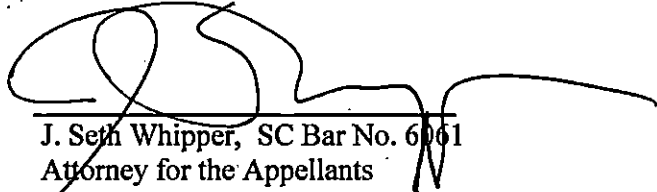
DESIGNATION OF MATTER

COMES NOW Appellants propose the following as the Record on Appeal:

1. Complaint (2005)
2. Complaint (2008)
3. Complaint (2019)
4. Corrected Amended Complaint (2019)
5. Order Restoring 2008-CP-10-02537 (10/1/2019)
6. Order Denying Motion to Amend (10/28/2020)
7. Order Denying Motion to Alter or Amen (1/14/2021)
8. Order Appointing Special Referee
9. Order Consolidating Actions
10. Motion To Alter/Amend Order (SCRCP 59(e)) (10/26/2020)
11. Motion to Amend Complaint (7/16/2020)
12. Memorandum In Support of Amending Complaint (11/23/2020)
13. Defendant's Memorandum In Opposition to Amending Complaint (6p)
(8/12/2020)

I certify that the Designation contains no matter which is irrelevant to this Appeal.

June 28, 2021


J. Seth Whipper, SC Bar No. 6061
Attorney for the Appellants
P.O. Box 70070
North Charleston, SC 29415

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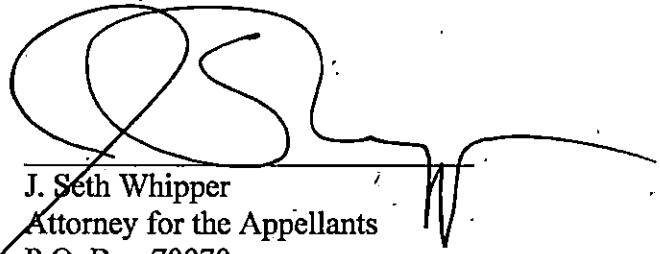
v.

Chloe Knight Tonney isRespondent

PROOF OF SERVICE

The undersigned hereby certifies that the true copy of the foregoing Appellants' Initial Brief and Designation of Matter has been served on the South Carolina Court of Appeals by depositing a copy to them in the United States Mail, postage prepaid, on June 28th, 2021, addressed to Clerk, South Carolina Court of Appeals, Post Office Box 11629, Columbia, South Carolina 29211 and served the same on Charles S. Altman, Attorney for Respondent, 575 King Street, Suite A, Charleston, SC 29403.

June 28, 2021



J. Seth Whipper
Attorney for the Appellants
P.O. Box 70070
North Charleston, SC 29415
843-740-7777

WHIPPER LAW FIRM

Attorneys and Counselors at Law

4592 Durant Avenue
North Charleston, SC 29405
(843) 740-7777
FAX (843) 740-9108

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SC Court of Appeals

CHERYL WHIPPER HAMILTON
J. SETH WHIPPER

MAILING ADDRESS
POST OFFICE BOX 70070
NORTH CHARLESTON, SC 29415

June 28, 2021

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

U.S. Mail Only

**Re: Judith A. Brown, as Personal Representative for the Estate of Mildred C. Knight, and
Norman R. "Bobby" Knight III, Appellants v. Chloe Knight Tonney, Respondent
Appellants' Case No. 2021-000185
Original Appellants' Initial Brief- For Filing
Designation of Matter - For Filing
↑ Proof of Service- For Filing**

Dear Ms. Kitchings:

Find enclosed 1 Original Appellants' Initial Brief, 1 Unbound Designation of Matter, and the Proof of Service for filing and conforming. Also, enclosed is a self-addressed, stamped envelope for the return of the Proof of Service.

By copy of this letter, I am serving a copy of the same on Charles S. Altman, Esq. attorney for Respondent.

Sincerely,
WHIPPER LAW FIRM

J. Seth Whipper, Esquire

JSW:lds
Enclosures

xc: Bobby Knight
Judith A. Brown



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SC Court of Appeals

The Honorable Jenny Abbott Kitchens
 Clerk, South Carolina Court of Appeals
 Post Office Box 11629
 Columbia, South Carolina 29211

J. Seth Whipper, Esq.
 Whipper Law Firm
 P.O. Box 70070
 North Charleston, SC 29415

