

The State of South Carolina In The Court of Appeals

Appeal from Charleston County
Hon. J. Derham Cole, Circuit Court Judge

Case No. 2019-CP-10-1887
Probate Case No. 2016-ES-10-02054
Appeal Case 2020-000853

In the Matter of re Estate of Annie Mae Crosby:

Jessie Fred Crosby and Robert Edward Crosby, Jr., Respondents

v.

Rose Mae Crosby Walsh, individually and as personal representative of the Estate
of Annie Mae Crosby, and Kelvin Wayne Crosby, Respondents,

Of Whom Rose Mae Crosby Walsh, individually and as personal representative of
the Estate of Annie Mae Crosby is the Appellant.

RECORD ON APPEAL VOLUME THREE

Gregg Meyers
217 Lucas Street Unit F1
Mt. Pleasant SC 29464
843-324-1589
attygm@gmail.com
Attorney for appellant Rose Walsh
Crosby, individually and
as personal representative

Thomas E. Lydon
McAngus, Gouldelock, & Courie, LLC
1320 Main Street, 10th Floor
PO Box 12519
Columbia SC 29211
803-779-2300
tlydon@mgclaw.com
Attorney for respondents Jessie Fred Crosby
And Robert Edward Crosby, Jr.

Kelvin Crosby, pro se
181 Azalea Drive
Waynesville NC 28786

Volume 3

Pleadings (cont'd)

- | | | |
|-----|---|----------------|
| 7. | (cont'd) Attachment A to the 6/25/18 Return to Petition,
Counterclaim, Motions For Judgment on the Pleadings
and for Summary Judgment | pp. 349 to 564 |
| 23. | 7/11/18 Affidavit of Jesse Crosby | pp. 565 to 566 |
| 24. | 7/12/18 Answer to Counterclaim | pp. 567 to 568 |
| 25. | 7/27/18 Inventory and Appraisement of non-probate property | pp. 569 to 577 |

Subject: Crosby order
Date: Friday, May 18, 2018 at 2:17:21 PM Central Daylight Time
From: Anne Kelley Russell
To: david michel, Dennis O'Neill, Gregg Meyers
CC: shelly@scelderlaw.com
Attachments: image003.jpg, CHARLESTON - 715800v1 - Crosby - Order .pdf

All,

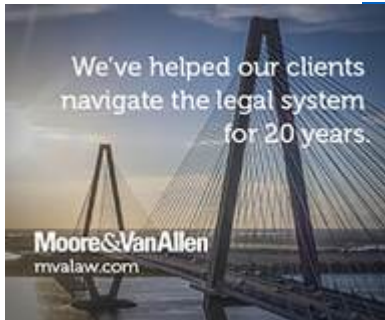
Attached please find the signed order that we just picked up from the court. It is my understanding that they mailed this to each of the attorneys earlier this week but I have not yet received it.

I suggest that bidding begin on 3283 V.O. as soon as possible.

My best regards,
Anne Kelley

Anne Kelley Russell
Attorney at Law
T 843.579.7095
F 843.579.8737
annekrussell@mvalaw.com

Moore&VanAllen
78 Wentworth Street
Charleston, SC 29401
843.579.7000
www.mvalaw.com



Moore & Van Allen

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[Moore & Van Allen](#)

Subject: Re: Crosby order
Date: Friday, May 18, 2018 at 2:22:02 PM Central Daylight Time
From: david michel
To: Anne Kelley Russell, Dennis O'Neill, Gregg Meyers
CC: shelly@scelderlaw.com
Attachments: image003.jpg

Thanks.

As per my emails to Dennis and Gregg, I would like to have a plan in place before the bidding starts so that I don't miss a deadline. I have some family vacations coming up and I want to make sure I have access to my email and my clients.

Gregg,
Please let me know if you have time to discuss this on Monday?

Thanks,
David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

This communication may be attorney-client privileged or otherwise confidential. If you are not the intended recipient, please delete this message and notify the sender of this error.

From: Anne Kelley Russell <akrussell@mvalaw.com>
To: david michel <david@michellawoffice.com>; Dennis O'Neill <dennis@oneilllawfirm.com>; Gregg Meyers <greggmeyers@piercesloan.com>
Cc: "shelly@scelderlaw.com" <shelly@scelderlaw.com>
Sent: Friday, May 18, 2018 3:17 PM
Subject: Crosby order

All,

Attached please find the signed order that we just picked up from the court. It is my understanding that they mailed this to each of the attorneys earlier this week but I have not yet received it.

I suggest that bidding begin on 3283 V.O. as soon as possible.

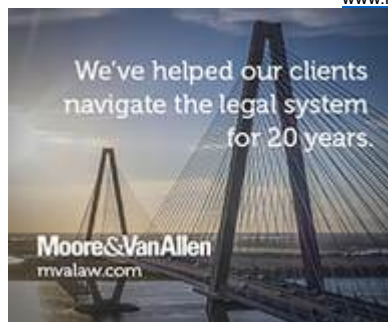
My best regards,
Anne Kelley

Anne Kelley Russell

Attorney at Law
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[Moore & Van Allen](#)

Subject: 3283 Von Ohsen Road bidding

Date: Monday, May 21, 2018 at 12:12:45 PM Central Daylight Time

From: Gregg Meyers

To: david@michellawoffice.com

CC: akrussell@mvalaw.com, rose.walsh@ingevity.com

Counsel:

Pursuant to last week's order, my client has opened the bidding process on 3283 Von Ohsen Road and hereby submits a bid of \$250,000.

It is 12:12 pm on Monday, May 21.

Gregg

Subject: RE: Estate of Crosby - Mill Street Property
Date: Monday, May 21, 2018 at 1:55:27 PM Central Daylight Time
From: Anne Kelley Russell
To: david michel
CC: shelly@scelderlaw.com, Dennis O'Neill, Gregg Meyers, Kristy Watts
Attachments: image004.jpg, image002.jpg

Dear David,

Shelly and I have received and reviewed your email in full. At this time, Rose in her capacity as Personal Representative is pressing forward with accomplishing the tasks that she is authorized to perform under the Court Order dated May 16, 2018, as follows:

1. Selling 3283 Von Ohsen Road. It appears that the bidding process has begun.
2. Selling the Cottageville Acreage. The closing for this property is set for on or around June 4, 2018.
3. Selling 3303 Von Ohsen Road. The closing for this property is scheduled for on or around June 1, 2018.
4. Selling 6613 Main Street to Jessie. Our goal is to make this distribution happen by May 31, 2018.
5. Making duplicates of all family pictures and providing them to each beneficiary. Our goal is to get CDs to all beneficiaries by May 31, 2018.
6. Distributing the remaining personal property at the Decedent's residence. It appears that beneficiaries' counsel has begun an initial conversation as to how to distribute the personal property.

Once these items have been handled, Rose will be in a better position to determine outstanding issues and begin making final distribution of the estate assets to the beneficiaries in accordance with the Will.

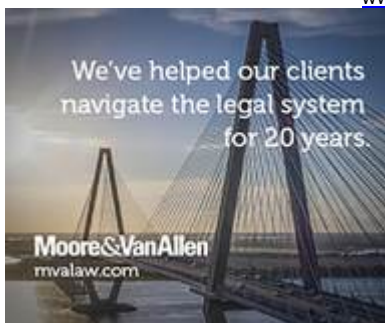
My best,
Anne Kelley

Anne Kelley Russell

Attorney at Law
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F 843.579.8737
annekrussell@mvalaw.com

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From: david michel [mailto:david@michellawoffice.com]
Sent: 05/21/2018 9:18 AM
To: Anne Kelley Russell
Cc: shelly@scelderlaw.com; Dennis O'Neill; Gregg Meyers
Subject: Re: Estate of Crosby - Mill Street Property

Anne Kelley,

Pursuant to Rule 11 of the SC Rules of Civil Procedure, I will file a Motion to Compel with the Probate Court if your client does not agree to deed the Mill Street Property to Jessie Crosby immediately. If I do not have a reply from you by 4 pm today, I have been instructed by my client to proceed with filing a Motion this week.

Per Rule 11, there are good grounds to support the Motion to Compel and it is not interposed for delay. This email meets the requirement that I have communicated with you prior to filing such Motion and I have attempted in good faith to resolve the issue. I made this request on behalf of my client on April 25, 2018.

The Motion to Compel will request that the Mill Street Property be deeded to Jessie Crosby immediately, that the Court stay any bidding process on the real property until such property is deed to Jessie, and that Rose Crosby Walsh be removed as PR immediately for obstructing Mr. Crosby's ability to fully participate in the bidding process. The Motion will show that Mrs. Walsh has a personal gain by refusing to deed said property to Mr. Crosby and that there are no impediments to this transfer (creditor's period has run, there is over \$300,000 in cash remaining in the estate, there is approximately \$300,000 plus in real property, and this was a specific devise).

Thank you and I look forward to hearing from you by 4 pm today.

David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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From: Anne Kelley Russell <akrussell@mvalaw.com>
To: david michel <david@michellawoffice.com>
Cc: "shelly@scelderlaw.com" <shelly@scelderlaw.com>
Sent: Friday, May 18, 2018 3:19 PM
Subject: RE: Estate of Crosby - Mill Street Property

David,

Thank you for your request. Shelly and I have discussed this request with Rose. We have both advised, and Rose agrees, that she cannot make a distribution to only Jessie at this time. We would prefer that the remaining outstanding issues of the estate be resolved before further distributions are made from the estate.

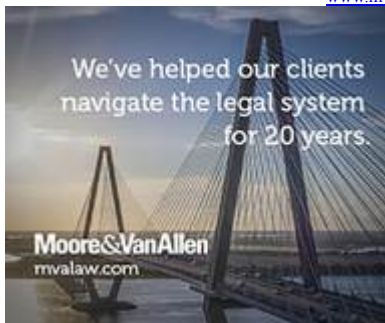
We trust you understand this.

Have a great weekend,

Anne Kelley Russell
Attorney at Law
T 843.579.7095
F 843.579.8737
annekrussell@mvalaw.com

Moore&VanAllen

78 Wentworth Street
Charleston, SC 29401
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www.mvalaw.com



From: david michel [<mailto:david@michellawoffice.com>]
Sent: 05/15/2018 9:44 AM
To: Anne Kelley Russell
Subject: Estate of Crosby - Mill Street Property

Anne Kelley,
Good morning. I hope you are feeling better.

Can you please provide me an update on having the Mill Street property deeded to my client Jessie Crosby per the Last Will and Testament. Again, I would request that this be done prior to the bidding process regarding 3283 V/O. If you believe this will not be done prior to the bidding, please let me know so I can file a Motion with the Court.

Thanks,
David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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[Moore & Van Allen](#)

Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 22, 2018 at 7:58:15 AM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: akrussell@mvalaw.com, rose.walsh@ingevity.com, JFcrosby25@yahoo.com

Gregg,
Good morning. I received your email yesterday with an opening bid of \$250,000.00.

Mr. Jessie Crosby bids \$252,000.00.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 21, 2018, 1:12 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

Counsel:

Pursuant to last week's order, my client has opened the bidding process on 3283 Von Ohsen Road and hereby submits a bid of \$250,000.

It is 12:12 pm on Monday, May 21.

Gregg

Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 22, 2018 at 8:39:52 AM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: akrussell@mvalaw.com, rose.walsh@ingevity.com, JFcrosby25@yahoo.com

Gregg,
I forget to put the date and time for the \$252,000 bid:

May 22, 2018 at 9:00 am.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 9:00 AM, david michel <david@michellawoffice.com> wrote:

Gregg,
Good morning. I received your email yesterday with an opening bid of \$250,000.00.

Mr. Jessie Crosby bids \$252,000.00.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

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Counsel:

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It is 12:12 pm on Monday, May 21.

Gregg

Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 22, 2018 at 9:04:19 AM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: akrussell@mvalaw.com

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22, 2018, at 8:40 AM, david michel <david@michellawoffice.com> wrote:

Gregg,
I forget to put the date and time for the \$252,000 bid:

May 22, 2018 at 9:00 am.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 9:00 AM, david michel <david@michellawoffice.com> wrote:

Gregg,
Good morning. I received your email yesterday with an opening bid of \$250,000.00.

Mr. Jessie Crosby bids \$252,000.00.

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David Michel

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It is 12:12 pm on Monday, May 21.

Gregg

Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 22, 2018 at 7:14:25 PM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: akrussell@mvalaw.com

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22, 2018, at 8:40 AM, david michel <david@michellawoffice.com> wrote:

Gregg,
I forget to put the date and time for the \$252,000 bid:

May 22, 2018 at 9:00 am.

Thanks
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[Sent from Yahoo Mail for iPhone](#)

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David Michel

[Sent from Yahoo Mail for iPhone](#)

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Counsel:

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It is 12:12 pm on Monday, May 21.

Gregg

Subject: Estate of Crosby - Motion To Compel
Date: Wednesday, May 23, 2018 at 9:14:33 AM Central Daylight Time
From: david michel
To: Anne Kelley Russell, Shelly K. All, Gregg Meyers, Dennis O'Neill, Kinloch Smith
Attachments: Motion To Compel 5-23-18.pdf

Please see attached Motion To Compel and Motion To Remove PR that was filed this morning. My office has mailed copies also.

Thanks,

David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Wednesday, May 23, 2018 at 11:32:12 AM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: Anne Kelley Russell
Attachments: image001.jpg

David:

Thanks for your email bidding 260. I am authorized to communicate that my client bids \$262,000.

We can take this issue up only if we need to once the bidding is over, but it seems to me that the order states the bidding is between Rose and Jessie, and, from page 5, that either of them can assign "up to \$75,000 of his or her expected share of the estate to the purchase." So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

This is just to let you know that we read the order differently in that regard. But we don't need to join that issue until it becomes ripe for adjudication, if and when it does. This is merely notice of the different read.

I am receptive to entertaining ideas about personal property distribution, but don't yet have an opinion about it. As of the moment I have no feel for the scope of that issue.

The motion to compel seems to me to be more properly directed to Anne's capacity for response, so I will let her take the lead on that score.

I am back in Charleston having been out of state for eye surgery. I should now be able to be more responsive than I was able to be last week.

Gregg Meyers
Of Counsel

Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

PIERCE | SLOAN
WILSON KENNEDY & EARLY LLC

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From: david michel <david@michellawoffice.com>
Date: Tuesday, May 22, 2018 at 8:14 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: "akrussell@mvalaw.com" <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22, 2018, at 8:40 AM, david michel <david@michellawoffice.com> wrote:

Gregg,
I forget to put the date and time for the \$252,000 bid:

May 22, 2018 at 9:00 am.

Thanks
David Michel

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Counsel:

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It is 12:12 pm on Monday, May 21.

Gregg

Subject: Re: 3283 Von Ohlsen Road bidding
Date: Wednesday, May 23, 2018 at 3:50:05 PM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Anne Kelley Russell
Attachments: image001.jpg

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

Thanks for your email bidding 260. I am authorized to communicate that my client bids \$262,000.

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Charleston, SC 29413-2437

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[\(843\) 725-7750](tel:(843)725-7750) (Direct)

[\(843\) 324-1589](tel:(843)324-1589) (Cell)

greggmeyers@piercesloan.com

www.piercesloan.com



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To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: "akrussell@mvalaw.com" <akrussell@mvalaw.com>
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May 22, 2018 at 9:00 am.

Thanks
David Michel

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Counsel:

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It is 12:12 pm on Monday, May 21.

Gregg

Subject: Estate of Crosby - 6613 Main Street
Date: Thursday, May 24, 2018 at 7:15:36 AM Central Daylight Time
From: david michel
To: Anne Kelley Russell, Dennis O'Neill, Shelly K. All
CC: Gregg Meyers

Anne Kelley,
Good morning. Do you want Jessie to send you or Shelly a check for 6613 Main Street or do you want to deduct that from his \$75,000 credit?

Just let me know what we need to do have that deed executed to Jessie.

Thanks.
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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Subject: RE: Estate of Crosby - 6613 Main Street
Date: Thursday, May 24, 2018 at 8:55:07 AM Central Daylight Time
From: Anne Kelley Russell
To: david michel, Dennis O'Neill, Shelly K. All
CC: Gregg Meyers
Attachments: image002.jpg

David,

Please have Jessie send Shelly All a check in the amount of **\$3,375.00** made payable to the Estate of Annie Mae Crosby. The address is:

Estate of Annie Mae Crosby
c/o Shelly K. All
Christensen & All, P.A.
260 W. Coleman Blvd., Suite D
Mt. Pleasant, SC 29464

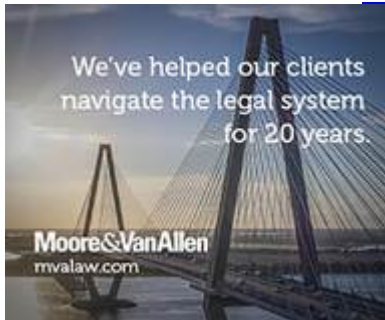
Thank you,

Anne Kelley Russell

Attorney at Law
T 843.579.7095
F 843.579.8737
annekrussell@mvalaw.com

Moore&VanAllen

78 Wentworth Street
Charleston, SC 29401
843.579.7000
www.mvalaw.com



From: david michel [mailto:david@michellawoffice.com]
Sent: 05/24/2018 8:16 AM
To: Anne Kelley Russell; Dennis O'Neill; Shelly K. All
Cc: Gregg Meyers
Subject: Estate of Crosby - 6613 Main Street

Anne Kelley,
Good morning. Do you want Jessie to send you or Shelly a check for 6613 Main Street or do you want to deduct that from his \$75,000 credit?

Just let me know what we need to do have that deed executed to Jessie.

Thanks.

David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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Moore & Van Allen

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[Moore & Van Allen](#)

Subject: Re: 3283 Von Ohsen Road bidding
Date: Thursday, May 24, 2018 at 1:49:30 PM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: Anne Kelley Russell
Attachments: image001.jpg

David:

I am authorized to convey a bid of \$270,000.

Gregg

On May 23, 2018, at 4:50 PM, david michel <david@michellawoffice.com> wrote:

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

Thanks for your email bidding 260. I am authorized to communicate that my client bids \$262,000.

We can take this issue up only if we need to once the bidding is

over, but it seems to me that the order states the bidding is between Rose and Jessie, and, from page 5, that either of them can assign "up to \$75,000 of his or her expected share of the estate to the purchase." So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

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I am receptive to entertaining ideas about personal property distribution, but don't yet have an opinion about it. As of the moment I have no feel for the scope of that issue.

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I am back in Charleston having been out of state for eye surgery. I should now be able to be more responsive than I was able to be last week.

Gregg Meyers

Of Counsel

Pierce Sloan Wilson Kennedy & Early LLC

The Blake-Grimké House

321 East Bay Street (29401)

P.O. Box 22437

Charleston, SC 29413-2437

[\(843\) 722-7733](tel:(843)722-7733)

[\(843\) 725-7750](tel:(843)725-7750) (Direct)

[\(843\) 324-1589](tel:(843)324-1589) (Cell)

greggmeyers@piercesloan.com

www.piercesloan.com

<image001.jpg>

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From: david michel <david@michellawoffice.com>
Date: Tuesday, May 22, 2018 at 8:14 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: "akrussell@mvalaw.com" <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohlsen Road bidding

Gregg,

Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,

David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22, 2018, at 8:40 AM, david michel
<david@michellawoffice.com> wrote:

Gregg,
I forget to put the date and time for the \$252,000
bid:

May 22, 2018 at 9:00 am.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 9:00 AM, david michel
<david@michellawoffice.com> wrote:

Gregg,
Good morning. I received your email
yesterday with an opening bid of
\$250,000.00.

Mr. Jessie Crosby bids \$252,000.00.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 21, 2018, 1:12 PM,
Gregg Meyers
<greggmeyers@piercesloan.com>
wrote:

Counsel:

Pursuant to last week's
order, my client has opened
the bidding process on
3283 Von Ohsen Road and
hereby submits a bid of
\$250,000.

It is 12:12 pm on Monday,
May 21.

Gregg

<image001.jpg>

Subject: Re: 3283 Von Ohsen Road bidding
Date: Friday, May 25, 2018 at 10:00:46 AM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Anne Kelley Russell

Gregg,
Good morning. My client bids \$272,000.00.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$270,000.

Gregg

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Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32 PM, Gregg Meyers

[<greggmeyers@piercesloan.com>](mailto:greggmeyers@piercesloan.com) wrote:

David:

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We can take this issue up only if we need to once the bidding is over, but it seems to me that the order states the bidding is between Rose and Jessie, and, from page 5, that either of them can assign "up to \$75,000 of his or her expected share of the estate to the purchase." So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

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The motion to compel seems to me to be more properly directed to Anne's capacity for response, so I will let her take the lead on that score.

I am back in Charleston having been out of state for eye surgery. I should now be able to be more

responsive than I was able to be last week.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
[\(843\) 722-7733](tel:(843)722-7733)
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greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel <david@michellawoffice.com>
Date: Tuesday, May 22, 2018 at 8:14 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: "akrussell@mvalaw.com" <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

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Good evening. My client bids \$260,000.

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Thanks,
David Michel

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My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22, 2018, at 8:40 AM, david michel
<david@michellawoffice.com> wrote:

Gregg,
I forget to put the date and time for the
\$252,000 bid:

May 22, 2018 at 9:00 am.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 9:00 AM,
david michel
<david@michellawoffice.com> wrote:

Gregg,
Good morning. I received
your email yesterday with
an opening bid of
\$250,000.00.

Mr. Jessie Crosby bids
\$252,000.00.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 21, 2018,
1:12 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

Counsel:

Pursuant to last week's order, my client has opened the bidding process on 3283 Von Ohsen Road and hereby submits a bid of \$250,000.

It is 12:12 pm on Monday, May 21.

Gregg

<image001.jpg>

Subject: Bid

Date: Saturday, May 26, 2018 at 9:01:41 AM Central Daylight Time

From: Gregg Meyers

To: Michel David

CC: Russell Anne

David:

I am authorized to make a bid of \$278,000.

Gregg

Subject: Re: 3283 Von Ohsen Road bidding
Date: Saturday, May 26, 2018 at 9:29:09 AM Central Daylight Time
From: david michel
To: david michel, Gregg Meyers
CC: Anne Kelley Russell

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid
From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good morning. My client bids \$272,000.00.

Thanks

David Michel

[Sent from Yahoo Mail for iPhone](#)

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Davis Michel

[Sent from Yahoo Mail for iPhone](#)

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I am back in Charleston having been out of state for eye surgery. I should now be able to be more responsive than I was able to be last week.

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The Blake-Grimké House
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greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel <david@michellawoffice.com>
Date: Tuesday, May 22, 2018 at 8:14 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: "akrussell@mvalaw.com" <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

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My client has authorized me to increase her bid to \$258,000.

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On May 22, 2018, at 8:40 AM, david michel <david@michellawoffice.com> wrote:

Gregg,
I forget to put the date and time for the
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May 22, 2018 at 9:00 am.

Thanks
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[Sent from Yahoo Mail for iPhone](#)

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[Sent from Yahoo Mail for iPhone](#)

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bidding process
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and hereby
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of \$250,000.

It is 12:12 pm
on Monday,
May 21.

Gregg

<image001.jpg>

Subject: Re: 3283 Von Ohsen Road bidding
Date: Saturday, May 26, 2018 at 11:58:12 AM Central Daylight Time
From: david michel
To: Gregg Meyers
Attachments: image001.jpg

Perfect.

843-345-5667.

Thanks and enjoy your weekend.

David Michel

[Sent from Yahoo Mail for iPhone](#)

On Saturday, May 26, 2018, 12:25 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

Good idea. I was working from my phone, so was limited in finding the old chain.

My cell number is below. Why don't you send me yours and every time I send a bid I can also send you a text to tell you I have? Makes it easier on both of us if we do that for each other, to make sure the other knows the clock has started. Seem agreeable? Keeps us from having to check email continually.

Gregg Meyers

Of Counsel

Pierce Sloan Wilson Kennedy & Early LLC

The Blake-Grimké House

321 East Bay Street (29401)

P.O. Box 22437

Charleston, SC 29413-2437

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greggmeyers@piercesloan.com

www.piercesloan.com



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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,

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To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

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David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
[\(843\) 722-0020](tel:8437220020)
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohlsen Road bidding

Gregg,
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Thanks
David Michel

Sent from Yahoo Mail for iPhone

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<image001.jpg>

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Cc: "akrussell@mvalaw.com"
<akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

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[Sent from Yahoo Mail for iPhone](#)

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Gregg

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May 22, 2018 at 9:00 am.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

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bid of
\$250,000.00.

Mr. Jessie
Crosby bids
\$252,000.00.

Thanks,
David Michel

[Sent from
Yahoo Mail for
iPhone](#)

On Monday,
May 21, 2018,
1:12 PM, Gregg
Meyers
<[greggmeyers
@piercesloan.c
om](mailto:greggmeyers@piercesloan.com)> wrote:

Co
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Gre
gg

<image001.jpg>

Subject: Re: 3283 Von Ohsen Road bidding
Date: Saturday, May 26, 2018 at 3:56:36 PM Central Daylight Time
From: david michel
To: Gregg Meyers, Anne Kelley Russell
Attachments: image001.jpg

Gregg,
Good afternoon. My client bids \$280,000.

Thanks
David Michel
843-345-5667

[Sent from Yahoo Mail for iPhone](#)

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greggmeyers@piercesloan.com

www.piercesloan.com



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To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
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I am authorized to make a bid of \$278,000.

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<image001.jpg>

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Gre
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Subject: Re: 3283 Von Ohsen Road bidding
Date: Sunday, May 27, 2018 at 3:36:12 PM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: Russell Anne
Attachments: image001.jpg, image002.jpg

David:

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PIERCE | SLOAN
WILSON KENNEDY & EARLY LLC

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Gre
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<image001.jpg>

Subject: Re: 3283 Von Ohsen Road bidding
Date: Sunday, May 27, 2018 at 4:13:10 PM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Russell Anne
Attachments: image001.jpg, image002.jpg

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9:00 AM, david
michel
<david@michellawoffice.com>
wrote:

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On

Monday,
May 21, 2018,
1:12 PM,
Gregg Meyers
<gregg.meyers@piercesloan.com>
wrote:

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Monday, May 28, 2018 at 1:42:06 PM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Russell Anne
Attachments: image001.jpg, image002.jpg

Good afternoon. My client bids 285,000.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Sunday, May 27, 2018, 4:36 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$283,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
[\(843\) 722-7733](tel:(843)722-7733)
[\(843\) 725-7750](tel:(843)725-7750) (Direct)
[\(843\) 324-1589](tel:(843)324-1589) (Cell)
greggmeyers@piercesloan.com



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From: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 4:57 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,

Good afternoon. My client bids \$280,000.

Thanks

David Michel

[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

On Saturday, May 26, 2018, 12:25 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

David:

Good idea. I was working from my phone, so was limited in finding the old chain.

My cell number is below. Why don't you send me yours and every time I send a bid I can also send you a text to tell you I have? Makes it easier on both of us if we do that for each other, to make sure the other knows the clock has started. Seem agreeable? Keeps us from having to check email continually.

Gregg Meyers
Of Counsel
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greggmeyers@piercesloan.com
www.piercesloan.com



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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track.
Thanks,
David

Subject: Bid
From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
[\(843\) 722-0020](tel:(843)722-0020)
David@Michellawoffice.com

This communication may be attorney-client privileged or otherwise confidential. If you are not the intended recipient, please delete this message and notify the sender of this error.

From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,

Good morning. My client bids \$272,000.00.

Thanks

David Michel

Sent from Yahoo Mail for iPhone

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$270,000.

Gregg

On May 23, 2018, at 4:50 PM, david michel
<david@michellawoffice.com> wrote:

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

Sent from Yahoo Mail for iPhone

On Wednesday, May 23, 2018, 12:32 PM, Gregg
Meyers <greggmeyers@piercesloan.com> wrote:

David:

Thanks for your email bidding
260. I am authorized to
communicate that my client
bids \$262,000.

We can take this issue up only
if we need to once the bidding
is over, but it seems to me that
the order states the bidding is
between Rose and Jessie, and,
from page 5, that either of
them can assign "up to

\$75,000 of his or her expected share of the estate to the purchase.” So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby’s expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

This is just to let you know that we read the order differently in that regard. But we don’t need to join that issue until it becomes ripe for adjudication, if and when it does. This is merely notice of the different read.

I am receptive to entertaining ideas about personal property distribution, but don’t yet have an opinion about it. As of the moment I have no feel for the scope of that issue.

The motion to compel seems to me to be more properly directed to Anne’s capacity for response, so I will let her take

the lead on that score.

I am back in Charleston having been out of state for eye surgery. I should now be able to be more responsive than I was able to be last week.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early
LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
[\(843\) 722-7733](tel:(843)722-7733)
[\(843\) 725-7750](tel:(843)725-7750) (Direct)
[\(843\) 324-1589](tel:(843)324-1589) (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel
<david@michellawoffice.com>
Date: Tuesday, May 22, 2018 at 8:14 PM
To: Gregg Meyers
<greggmeyers@piercesloan.com>
Cc: "akrussell@mvalaw.com"
<akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids
\$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but
I'm in court tomorrow morning and
didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM,
Gregg Meyers
<greggmeyers@piercesloan.com>
wrote:

My client has authorized me
to increase her bid to
\$258,000.

This bid was submitted at
10:04 a.m. edt on May 22.

Gregg

On May 22, 2018, at 8:40
AM, david michel
<[david@michellawoffice.co](mailto:david@michellawoffice.com)
[m](mailto:david@michellawoffice.com)> wrote:

Gregg,
I forget to put
the date and
time for the
\$252,000 bid:

May 22, 2018
at 9:00 am.

Thanks
David Michel

[Sent from
Yahoo Mail for
iPhone](#)

On Tuesday,
May 22, 2018,
9:00 AM, david
michel
<david@michellawoffice.com>
wrote:

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On

Monday,
May 21, 2018,
1:12 PM,
Gregg Meyers
<gregg.meyers@piercesloan.com>
wrote:

Counsel:

Pursuant to the

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 29, 2018 at 8:46:36 AM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: Russell Anne
Attachments: image001.jpg, image002.jpg, image003.jpg

David:

I am authorized to convey a bid of \$305,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com



PIERCE | SLOAN
WILSON KENNEDY & EARLY LLC

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From: david michel <david@michellawoffice.com>
Date: Monday, May 28, 2018 at 2:44 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Typo bids

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 28, 2018, 2:42 PM, david michel <david@michellawoffice.com> wrote:

Good afternoon. My client bids 285,000.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Sunday, May 27, 2018, 4:36 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$283,000.

Gregg Meyers

Of Counsel

Pierce Sloan Wilson Kennedy & Early LLC

The Blake-Grimké House

321 East Bay Street (29401)

P.O. Box 22437

Charleston, SC 29413-2437

[\(843\) 722-7733](tel:(843)722-7733)

[\(843\) 725-7750](tel:(843)725-7750) (Direct)

[\(843\) 324-1589](tel:(843)324-1589) (Cell)

greggmeyers@piercesloan.com

www.piercesloan.com

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From: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 4:57 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,

Good afternoon. My client bids \$280,000.

Thanks

David Michel

[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

On Saturday, May 26, 2018, 12:25 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

David:

Good idea. I was working from my phone, so was limited in finding the old chain.

My cell number is below. Why don't you send me yours and every time I send a bid I can also send you a text to tell you I have? Makes it easier on both of us if we do that for each other, to make sure the other knows the clock has started. Seem agreeable? Keeps us from having to check email continually.

Gregg Meyers
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[\(843\) 725-7750](tel:(843)725-7750) (Direct)
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greggmeyers@piercesloan.com
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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid
From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
[\(843\) 722-0020](tel:(843)722-0020)
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,

Good morning. My client bids \$272,000.00.

Thanks

David Michel

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$270,000.

Gregg

On May 23, 2018, at 4:50 PM, david michel
<david@michellawoffice.com> wrote:

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32
PM, Gregg Meyers
<greggmeyers@piercesloan.com>
wrote:

David:

Thanks for your email
bidding 260. I am
authorized to
communicate that my
client bids \$262,000.

We can take this
issue up only if we
need to once the

bidding is over, but it seems to me that the order states the bidding is between Rose and Jessie, and, from page 5, that either of them can assign "up to \$75,000 of his or her expected share of the estate to the purchase." So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

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I am back in Charleston having been out of state for eye surgery. I should now be able to be more responsive than I was able to be last week.

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Pierce Sloan Wilson
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[\(843\) 324-1589](tel:(843)324-1589) (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel
<david@michellawoffice.com>

Date: Tuesday, May 22, 2018 at 8:14 PM

To: Gregg Meyers
<greggmeyers@piercesloan.com>

Cc:
"akrussell@mvalaw.com"
<akrussell@mvalaw.com>

Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22,
2018, at 8:40
AM, david
michel
<david@michellawoffice.com>
wrote:

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[Sent from Yahoo Mail for iPhone](#)

On Monday, May 21, 2012

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 29, 2018 at 9:16:46 AM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Russell Anne
Attachments: image001.jpg, image002.jpg, image003.jpg

Gregg,
Received. Thanks,
David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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From: Gregg Meyers <greggmeyers@piercesloan.com>
To: david michel <david@michellawoffice.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Sent: Tuesday, May 29, 2018 9:46 AM
Subject: Re: 3283 Von Ohsen Road bidding

David:

I am authorized to convey a bid of \$305,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

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Typo bids

[Sent from Yahoo Mail for iPhone](#)

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Good afternoon. My client bids 285,000.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

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From: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 4:57 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good afternoon. My client bids \$280,000.

Thanks
David Michel
[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

On Saturday, May 26, 2018, 12:25 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

Good idea. I was working from my phone, so was limited in finding the old chain.

My cell number is below. Why don't you send me yours and every time I send a bid I can also send you a text to tell you I have? Makes it easier on both of us if we do that for each other, to make sure the other knows the clock has started. Seem agreeable? Keeps us from having to check email continually.

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Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid
From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>

To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohlsen Road bidding

Gregg,
Good morning. My client bids \$272,000.00.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers
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David:

I am authorized to convey a bid of \$270,000.

Gregg

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Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32
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wrote:

David:

Thanks for your email
bidding 260. I am
authorized to
communicate that my
client bids \$262,000.

We can take this issue up only if we need to once the bidding is over, but it seems to me that the order states the bidding is between Rose and Jessie, and, from page 5, that either of them can assign "up to \$75,000 of his or her expected share of the estate to the purchase." So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of

assignment.

This is just to let you know that we read the order differently in that regard. But we don't need to join that issue until it becomes ripe for adjudication, if and when it does. This is merely notice of the different read.

I am receptive to entertaining ideas about personal property distribution, but don't yet have an opinion about it. As of the moment I have no feel for the scope of that issue.

The motion to compel seems to me to be more properly directed to Anne's capacity for response, so I will let her take the lead on that score.

I am back in Charleston having been out of state for eye surgery. I should now be able to be more responsive than I was able to be last week.

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greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel
<david@michellawoffice.com>

Date: Tuesday, May 22, 2018 at 8:14 PM

To: Gregg Meyers
<greggmeyers@piercesloan.com>

Cc:
"akrussell@mvalaw.com"
<akrussell@mvalaw.com>

Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22,
2018, at 8:40
AM, david
michel
<david@michellawoffice.com>
wrote:

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 29, 2018 at 1:12:46 PM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Russell Anne
Attachments: image001.jpg, image002.jpg, image003.jpg

Gregg,
Good afternoon.

My client bids \$307,000.

David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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From: Gregg Meyers <greggmeyers@piercesloan.com>
To: david michel <david@michellawoffice.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Sent: Tuesday, May 29, 2018 9:46 AM
Subject: Re: 3283 Von Ohsen Road bidding

David:

I am authorized to convey a bid of \$305,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
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greggmeyers@piercesloan.com
www.piercesloan.com

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From: david michel <david@michellawoffice.com>
Date: Monday, May 28, 2018 at 2:44 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Typo bids

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 28, 2018, 2:42 PM, david michel <david@michellawoffice.com> wrote:

Good afternoon. My client beds 285,000.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

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I am authorized to convey a bid of \$283,000.

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Date: Saturday, May 26, 2018 at 4:57 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good afternoon. My client bids \$280,000.

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David Michel
[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

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Good idea. I was working from my phone, so was limited in finding the old chain.

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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
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I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid

From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohlsen Road bidding

Gregg,
Good morning. My client bids \$272,000.00.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$270,000.

Gregg

On May 23, 2018, at 4:50 PM, david michel
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Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32
PM, Gregg Meyers
<greggmeyers@piercesloan.com>
wrote:

David:

Thanks for your email
bidding 260. I am
authorized to
communicate that my
client bids \$262,000.

We can take this issue up only if we need to once the bidding is over, but it seems to me that the order states the bidding is between Rose and Jessie, and, from page 5, that either of them can assign "up to \$75,000 of his or her expected share of the estate to the purchase." So I am not sure that Judge Condon would agree that it complies with the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of

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greggmeyers@piercesloan.com
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<image001.jpg>

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From: david michel
<david@michellawoffice.com>

Date: Tuesday, May 22, 2018 at 8:14 PM

To: Gregg Meyers
<greggmeyers@piercesloan.com>

Cc:
"akrussell@mvalaw.com"
<akrussell@mvalaw.com>

Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this after hours but I'm in court tomorrow morning and didn't want to be late in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, May 22, 2018, 10:04 AM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

My client has authorized me to increase her bid to \$258,000.

This bid was submitted at 10:04 a.m. edt on May 22.

Gregg

On May 22,
2018, at 8:40
AM, david
michel
<david@michellawoffice.com>
wrote:

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[Sent from Yahoo Mail for iPhone](#)

On Monday, May 21, 2012

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Tuesday, May 29, 2018 at 2:54:52 PM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: Russell Anne
Attachments: image001.jpg, image002.jpg, image003.jpg, image004.jpg

David:

I am authorized to convey a bid of \$310,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com



PIERCE | SLOAN
WILSON KENNEDY & EARLY LLC

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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Tuesday, May 29, 2018 at 2:12 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,

Good afternoon.

My client bids \$307,000.

David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020

David@Michellawoffice.com

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To: david michel <david@michellawoffice.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Sent: Tuesday, May 29, 2018 9:46 AM
Subject: Re: 3283 Von Ohsen Road bidding

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To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Typo bids

[Sent from Yahoo Mail for iPhone](#)

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Good afternoon. My client bids 285,000.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

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From: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 4:57 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good afternoon. My client bids \$280,000.

Thanks
David Michel
[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

On Saturday, May 26, 2018, 12:25 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

Good idea. I was working from my phone, so was limited in finding the old chain.

My cell number is below. Why don't you send me yours and every time I send a bid I can also send you a text to tell you I have? Makes it easier on both of us if we do that for each other, to make sure the other knows the clock has started. Seem agreeable? Keeps us from having to check email

continually.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
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P.O. Box 22437
Charleston, SC 29413-2437
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greggmeyers@piercesloan.com
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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid

From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
[\(843\) 722-0020](tel:8437220020)
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good morning. My client bids \$272,000.00.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$270,000.

Gregg

On May 23, 2018, at 4:50 PM, david michel <david@michellawoffice.com> wrote:

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32
PM, Gregg Meyers
<greggmeyers@piercesloan.com>
wrote:

David:

Thanks for your email
bidding 260. I am
authorized to
communicate that my
client bids \$262,000.

We can take this
issue up only if we
need to once the
bidding is over, but it
seems to me that the
order states the
bidding is between
Rose and Jessie,
and, from page 5,
that either of them
can assign "up to
\$75,000 of his or her
expected share of the
estate to the
purchase." So I am
not sure that Judge
Condon would agree
that it complies with

the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

This is just to let you know that we read the order differently in that regard. But we don't need to join that issue until it becomes ripe for adjudication, if and when it does. This is merely notice of the different read.

I am receptive to entertaining ideas about personal property distribution, but don't yet have an opinion about it. As of

the moment I have no
feel for the scope of
that issue.

The motion to compel
seems to me to be
more properly
directed to Anne's
capacity for
response, so I will let
her take the lead on
that score.

I am back in
Charleston having
been out of state for
eye surgery. I should
now be able to be
more responsive than
I was able to be last
week.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson
Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street
(29401)
P.O. Box 22437
Charleston, SC 29413-
2437
[\(843\) 722-7733](tel:(843)722-7733)
[\(843\) 725-7750](tel:(843)725-7750) (Direct)
[\(843\) 324-1589](tel:(843)324-1589) (Cell)

greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel
<david@michellawoffice.com>

Date: Tuesday, May 22, 2018 at 8:14 PM

To: Gregg Meyers
<greggmeyers@piercesloan.com>

Cc:
"akrussell@mvalaw.com"
<akrussell@mvalaw.com>

Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this
after hours but I'm in
court tomorrow morning
and didn't want to be late
in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for
iPhone](#)

On Tuesday, May 22, 2018,
10:04 AM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

My client has
authorized me
to increase her
bid to
\$258,000.

This bid was
submitted at
10:04 a.m. edt
on May 22.

Gregg

On May 22,
2018, at 8:40
AM, david
michel
<david@michellawoffice.com>
wrote:

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Wednesday, May 30, 2018 at 1:03:50 PM Central Daylight Time
From: david michel
To: Gregg Meyers
CC: Russell Anne
Attachments: image001.jpg, image002.jpg, image003.jpg, image004.jpg

Gregg,
Good afternoon.

My client bids \$312,000.

Thanks,
David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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From: Gregg Meyers <greggmeyers@piercesloan.com>
To: david michel <david@michellawoffice.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Sent: Tuesday, May 29, 2018 3:54 PM
Subject: Re: 3283 Von Ohsen Road bidding

David:

I am authorized to convey a bid of \$310,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
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Good afternoon.

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David@Michellawoffice.com

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Typo bids

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From: david michel <david@michellawoffice.com>

Date: Saturday, May 26, 2018 at 4:57 PM

To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley

Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

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Thanks
David Michel
[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

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greggmeyers@piercesloan.com
www.piercesloan.com



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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid
From: Gregg Meyers (greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
[\(843\) 722-0020](tel:(843)722-0020)
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohlsen Road bidding

Gregg,
Good morning. My client bids \$272,000.00.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Thursday, May 24, 2018, 2:49 PM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$270,000.

Gregg

On May 23, 2018, at 4:50 PM, david michel
<david@michellawoffice.com> wrote:

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for iPhone](#)

On Wednesday, May 23, 2018, 12:32
PM, Gregg Meyers
<greggmeyers@piercesloan.com>
wrote:

David:

Thanks for your email
bidding 260. I am
authorized to
communicate that my
client bids \$262,000.

We can take this
issue up only if we
need to once the
bidding is over, but it
seems to me that the
order states the
bidding is between
Rose and Jessie,
and, from page 5,
that either of them
can assign "up to
\$75,000 of his or her
expected share of the
estate to the
purchase." So I am
not sure that Judge
Condon would agree
that it complies with

the order for Jessie to try to make payment by assigning Bobby's expected share rather than his own, or in addition to his own. Should Jessie purchase it, he is of course free to arrange the ownership interest any way he chooses between he and Bobby or anyone else. I think the issue I am talking about comes into play only if Jessie wins the bid and attempts to achieve the payment by that method of assignment.

This is just to let you know that we read the order differently in that regard. But we don't need to join that issue until it becomes ripe for adjudication, if and when it does. This is merely notice of the different read.

I am receptive to entertaining ideas about personal property distribution, but don't yet have an opinion about it. As of

the moment I have no
feel for the scope of
that issue.

The motion to compel
seems to me to be
more properly
directed to Anne's
capacity for
response, so I will let
her take the lead on
that score.

I am back in
Charleston having
been out of state for
eye surgery. I should
now be able to be
more responsive than
I was able to be last
week.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson
Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street
(29401)
P.O. Box 22437
Charleston, SC 29413-
2437
[\(843\) 722-7733](tel:8437227733)
[\(843\) 725-7750](tel:8437257750) (Direct)
[\(843\) 324-1589](tel:8433241589) (Cell)

greggmeyers@piercesloan.com
www.piercesloan.com

<image001.jpg>

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From: david michel
<david@michellawoffice.com>

Date: Tuesday, May 22, 2018 at 8:14 PM

To: Gregg Meyers
<greggmeyers@piercesloan.com>

Cc:
"akrussell@mvalaw.com"
<akrussell@mvalaw.com>

Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good evening. My client bids \$260,000.

May 22, 2018 at 8:14 pm.

Sorry for sending this
after hours but I'm in
court tomorrow morning
and didn't want to be late
in responding.

Thanks,
David Michel

[Sent from Yahoo Mail for
iPhone](#)

On Tuesday, May 22, 2018,
10:04 AM, Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

My client has
authorized me
to increase her
bid to
\$258,000.

This bid was
submitted at
10:04 a.m. edt
on May 22.

Gregg

On May 22,
2018, at 8:40
AM, david
michel
<david@michellawoffice.com>
wrote:

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Subject: Re: 3283 Von Ohsen Road bidding
Date: Thursday, May 31, 2018 at 1:04:34 PM Central Daylight Time
From: Gregg Meyers
To: david michel
CC: Russell Anne
Attachments: image001.jpg, image002.jpg

David:

I am informed that my client declines to make another bid after your client's bid yesterday of \$312,000.

We ask your client deliver his payment as required in the order to Shelley All's office, 260 W Coleman Blvd in Mt Pleasant by 2:07 p on June 11.

Thank you.

Gregg

On May 30, 2018, at 2:04 PM, david michel <david@michellawoffice.com> wrote:

Gregg,
Good afternoon.

My client bids \$312,000.

Thanks,
David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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From: Gregg Meyers <greggmeyers@piercesloan.com>
To: david michel <david@michellawoffice.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Sent: Tuesday, May 29, 2018 3:54 PM
Subject: Re: 3283 Von Ohsen Road bidding

David:

I am authorized to convey a bid of \$310,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com



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From: david michel <david@michellawoffice.com>
Reply-To: david michel <david@michellawoffice.com>
Date: Tuesday, May 29, 2018 at 2:12 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good afternoon.

My client bids \$307,000.

David
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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From: Gregg Meyers <greggmeyers@piercesloan.com>
To: david michel <david@michellawoffice.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Sent: Tuesday, May 29, 2018 9:46 AM
Subject: Re: 3283 Von Ohsen Road bidding

David:

I am authorized to convey a bid of \$305,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

<image002.jpg>

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From: david michel <david@michellawoffice.com>
Date: Monday, May 28, 2018 at 2:44 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Russell Anne <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Typo bids

[Sent from Yahoo Mail for iPhone](#)

On Monday, May 28, 2018, 2:42 PM, david michel <david@michellawoffice.com> wrote:

Good afternoon. My client bids 285,000.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

On Sunday, May 27, 2018, 4:36 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

I am authorized to convey a bid of \$283,000.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
(843) 722-7733
(843) 725-7750 (Direct)
(843) 324-1589 (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

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From: david michel <david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 4:57 PM
To: Gregg Meyers <greggmeyers@piercesloan.com>, Anne Kelley Russell <akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good afternoon. My client bids \$280,000.

Thanks
David Michel
[843-345-5667](tel:843-345-5667)

[Sent from Yahoo Mail for iPhone](#)

On Saturday, May 26, 2018, 12:25 PM, Gregg Meyers <greggmeyers@piercesloan.com> wrote:

David:

Good idea. I was working from my phone, so was limited in finding the old chain.

My cell number is below. Why don't you send me yours and every time I send a bid I can also send you a text to tell you I have? Makes it easier on both of us if we

do that for each other, to make sure the other knows the clock has started. Seem agreeable? Keeps us from having to check email continually.

Gregg Meyers
Of Counsel
Pierce Sloan Wilson Kennedy & Early LLC
The Blake-Grimké House
321 East Bay Street (29401)
P.O. Box 22437
Charleston, SC 29413-2437
[\(843\) 722-7733](tel:(843)722-7733)
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[\(843\) 324-1589](tel:(843)324-1589) (Cell)
greggmeyers@piercesloan.com
www.piercesloan.com

<image004.jpg>

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<david@michellawoffice.com>
Reply-To: david michel
<david@michellawoffice.com>
Date: Saturday, May 26, 2018 at 10:29 AM
To: david michel <david@michellawoffice.com>, Gregg Meyers
<greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell
<akrussell@mvalaw.com>
Subject: Re: 3283 Von Ohlsen Road bidding

Gregg,
this is to acknowledge that I have received your client's most recent bid.

I have copied and pasted the most recent bid into our original email chain - I just want to make sure we have an easy way to keep track. Thanks,
David

Subject: Bid
From: Gregg Meyers
(greggmeyers@piercesloan.com)
To: david@michellawoffice.com;
Cc: akrussell@mvalaw.com;
Bcc:
Date: Saturday, May 26, 2018 10:01 AM

David:

I am authorized to make a bid of \$278,000.

Gregg
David L. Michel
192 East Bay Street, Suite 202
Charleston, SC 29401
(843) 722-0020
David@Michellawoffice.com

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From: david michel <david@michellawoffice.com>
To: Gregg Meyers <greggmeyers@piercesloan.com>
Cc: Anne Kelley Russell <akrussell@mvalaw.com>
Sent: Friday, May 25, 2018 11:00 AM
Subject: Re: 3283 Von Ohsen Road bidding

Gregg,
Good morning. My client bids \$272,000.00.

Thanks
David Michel

[Sent from Yahoo Mail for iPhone](#)

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David:

I am authorized to convey a bid of \$270,000.

Gregg

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<david@michellawoffice.com> wrote:

Gregg,

Good afternoon.

My client bids \$264,000.

Thanks,
Davis Michel

[Sent from Yahoo Mail for
iPhone](#)

On Wednesday, May 23,
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David:

Thanks for
your email
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I am
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client bids
\$262,000.

We can take
this issue up
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need to
once the
bidding is
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order states
the bidding
is between
Rose and
Jessie, and,
from page
5, that either
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assign "up
to \$75,000
of his or her
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share of the
estate to the
purchase."

So I am not
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Judge
Condon
would agree
that it
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with the
order for
Jessie to try
to make
payment by
assigning
Bobby's
expected
share rather
than his
own, or in
addition to
his own.
Should
Jessie
purchase it,

he is of
course free
to arrange
the
ownership
interest any
way he
chooses
between he
and Bobby
or anyone
else. I think
the issue I
am talking
about
comes into
play only if
Jessie wins
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This is just
to let you
know that
we read the
order
differently in
that regard.
But we
don't need
to join that
issue until it
becomes
ripe for
adjudication

, if and
when it
does. This is
merely
notice of the
different
read.

I am
receptive to
entertaining
ideas about
personal
property
distribution,
but don't
yet have an
opinion
about it. As
of the
moment I
have no feel
for the
scope of
that issue.

The motion
to compel
seems to
me to be
more
properly
directed to
Anne's
capacity for
response,
so I will let
her take the
lead on that
score.

I am back in
Charleston
having been
out of state
for eye
surgery. I
should now
be able to
be more
responsive
than I was
able to be
last week.

Gregg Meyers
Of Counsel
Pierce Sloan
Wilson
Kennedy &
Early LLC
The Blake-
Grimké House
321 East Bay
Street (29401)
P.O. Box
22437
Charleston,
SC 29413-
2437
[\(843\) 722-7733](tel:(843)722-7733)
[\(843\) 725-7750](tel:(843)725-7750)
(Direct)
[\(843\) 324-1589](tel:(843)324-1589)
(Cell)
[greggmeyers@
piercesloan.co
m](mailto:greggmeyers@piercesloan.com)

www.piercesloan.com

<image001.jpg>

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From: david
michel
<david@michelawoffice.com>

Date:
Tuesday, May
22, 2018 at
8:14 PM

To: Gregg
Meyers
<greggmeyers@piercesloan.com>

Cc:
"akrussell@mv
alaw.com"
<[akrussell@mv
alaw.com](mailto:akrussell@mv
alaw.com)>

Subject: Re:
3283 Von
Ohsen Road
bidding

Gregg,
Good evening.
My client bids
\$260,000.

May 22, 2018
at 8:14 pm.

Sorry for
sending this
after hours
but I'm in
court
tomorrow
morning and
didn't want to
be late in
responding.

Thanks,
David Michel

[Sent from
Yahoo Mail for
iPhone](#)

On Tuesday,
May 22, 2018,
10:04 AM,
Gregg Meyers
<greggmeyers@piercesloan.com> wrote:

My
client
has
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increase
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\$25
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[https://www.columbiapro.com](#)

Counsel: Pursuant to last week, s order, m v

Client has opened the bidding process on 3/28/3 V on OHSEN Road and h

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STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

IN THE MATTER OF: THE ESTATE OF
ANNIE MAE CROSBY

JESSIE FRED CROSBY,

PETITIONER,

vs.

ROSE CROSBY WALSH,
INDIVIDUALLY, AND AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF
ANNIE MAE CROSBY,

RESPONDENT.

FILED

IN THE PROBATE COURT

18 JUL 17 AM 10:33
CASE NO. 2016-ES-10-2054

PROBATE COURT
CHARLESTON COUNTY

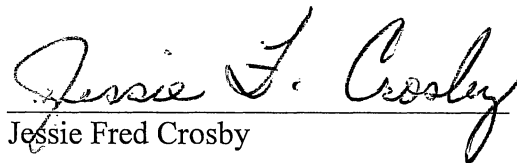
**Jessie F. Crosby's Affidavit Regarding
Motion To Compel and For Removal of
the Personal Representative**

PERSONALLY APPEARED before me, Jessie Fred Crosby, the Petitioner in the above captioned matter who is over the age of eighteen (18);

1. That on or about April 15, 2009, the Decedent, Annie Mae Crosby executed a Last Will and Testament.
2. That on page two, ITEM II, of the Decedent's Last Will and Testament, the Decedent bequeaths the vacant land on Mill Street bearing tax map number 385-10-00-018 to Petitioner Jessie Fred Crosby.
3. That on or about November 29, 2016, Annie Mae Crosby died.
4. That on January 26, 2017, the Court appointed Rose Crosby Walsh as Personal Representative of the Decedent's Estate.
5. That on April 25, 2018, counsel for Petitioner requested that Respondent immediately deed the Mills Street to Jessie Crosby.
6. That on May 15, 2018, counsel for Petitioner again requested that Respondent immediately deed the Mills Street property to Jessie Crosby.
7. That on May 18, 2018, counsel for Respondent denied Petitioner's request.

8. That on May 18, 2018, counsel for Respondent forwarded an email to all attorneys of record with this Court's Order of May 16, 2018 in which Respondent's counsel requested that the bidding for 3283 Von Oshen Road begin immediately.
9. That on May 21, 2018, at approximately 9:18 am, counsel for Petitioner again requested that the Mill Street Property be deed immediately to Jessie Crosby per the Decedent's Last Will and Testament so that Petitioner could use this property as collateral in the bidding process for 3283 Von Oshen.
10. That at the dates of these requests by Petitioner, the Creditor's Claim period had run and there are approximately \$300,000.00 in cash remaining in the estate.
11. That on May 21, 2018 at approximately 1:12 pm, individual counsel for Respondent began the bidding process for 3283 Von Oshen.
12. That on May 21, 2018 at approximately 2:55 pm, counsel for Respondent again denied Petitioner's request to immediately deed the Mill Street property without any legal explanation.
13. That because of Respondent's failure to deed the Mill Street property Petitioner has suffered in the bidding process for 3283 Von Oshen and was forced to purchase said property with the help of his brother Robert Crosby.
14. That Petitioner was going to use Mill Street as collateral for the purchase of 3283 Von Oshen and was at disadvantage in the bidding process.

FURTHER THE AFFIANT SAYETH NOT!


Jessie Fred Crosby

SWORN TO and SUBSCRIBED BEFORE me
this 11 day of July, 2018.


NOTARY PUBLIC FOR: SC

My Commission Expires: 10-6-2020

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

IN THE MATTER OF: THE ESTATE OF
ANNIE MAE CROSBY

JESSIE FRED CROSBY AND ROBERT
EDWARD CROSBY,

PETITIONERS,
vs.

ROSE CROSBY WALSH,
INDIVIDUALLY, AND AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF
ANNIE MAE CROSBY, AND KELVIN
WAYNE CROSBY,
RESPONDENTS.

IN THE PROBATE COURT
CASE NO. 2016-ES-10-2054

Answer to Respondent Walsh's
Counterclaim to Petition To Enforce Sale
and
Petition To Remove the Personal
Representative

FILED
18 JUL 12 AM 11:34
PROBATE COURT
CHARLESTON COUNTY

THE Petitioners ABOVE NAMED, through their undersigned counsel, answering Respondent Walsh's Counterclaim herein, alleges and would show unto this Honorable Court as follows:

1. Petitioners deny all allegations of the Counterclaim unless specifically admitted;
2. The allegations in paragraph 26, paragraph 27, paragraph 28, paragraph 29, paragraph 30, and paragraph 31 are denied.

WHEREFORE, Petitioners pray that a judgement be rendered against the Respondent Walsh for:

- (1) An Order Denying all Counterclaims;
- (2) All actual, special, consequential, punitive and all other damages allowed by law; and
- (3) All other relief as determined by this Honorable Court.

David L. Michel, Esquire
192 E. Bay Street, Ste. 202
Charleston, SC 29401
Phone: 843-722-0020
Fax: 843-278-9177
SC Bar No. 13578
David@Michellawoffice.com

BY: 

Attorney for Petitioners

7/11, 2018

STATE OF SOUTH CAROLINA

COUNTY OF: CHARLESTON

IN THE MATTER OF:
ANNIE MAE CROSBY
(Decedent)

IN THE PROBATE COURT

INVENTORY AND APPRAISEMENT

☒ ORIGINAL

(NON-PROBATE)

☐ AMENDED #

(must restate the unchanged information from the original Inventory)

CASE NUMBER: 2016ES10-02054-2

File the original Inventory and Appraisement with the Probate Court within ninety (90) days following the fiduciary appointment. A copy shall be sent to each interested person who has demanded it. A Proof of Delivery must be filed with the Court. The gross fair market value of all probate assets, regardless of location (whether in this state or elsewhere), should be listed as of the date of death. Continue on additional sheets if necessary. An Amended Inventory should be utilized for correcting, adjusting or adding to an original inventory, and *must restate the unchanged information from the original Inventory*. A qualified and disinterested appraiser may be employed to ascertain the value of any asset. If an appraiser is employed, his/her name and address must be indicated with the item or items he/she appraised.

RECAPITULATION

	Non-Probate (OPTIONAL)	Probate
Schedule A - Real Estate		\$ _____
Schedule B - Stocks and Bonds		\$ _____
Schedule C - Notes Due Decedent and Cash		\$ _____
Schedule D - Insurance on Decedent's Life - Part 1 - Payable to Estate		\$ _____
Part 2 - Payable to Beneficiary	\$ _____	
Schedule E - Jointly Owned Property	\$ _____	
Schedule F - Other Miscellaneous Assets Payable to Estate		\$ _____
Schedule G - Transfers During Decedent's Life	\$ _____	\$ _____
Schedule H - Powers of Appointment	\$ _____	\$ _____
Schedule I - Annuities and Retirement Accounts	\$ _____	\$ _____
GROSS VALUE OF PROBATE ESTATE		\$ _____

The undersigned, being sworn, states: That the following schedules contain a complete and accurate inventory and appraisement of all non-probate real and personal property of this estate so far as the undersigned is informed; that he/she has estimated and/or appraised all listed property at its fair market value, according to the best of his/her knowledge and ability.

SWORN to before me this 25th day of

July, 2018

Notary Public for South Carolina

My Commission Expires: 11-05-2024

Personal Representative

Signature: Rose Mae Crosby Walsh, pers repPrint Name: ROSE MAE CROSBY WALSHAddress: 3335 VON OHSEN RD.SUMMERVILLE, SC 29485

Telephone (Work): _____

(Home): _____

(Cell): _____

(Email): _____

Co-Personal Representative

Signature (if applicable) _____

Name: _____

Address: _____

Telephone (Work): _____

Telephone (Home): _____

(Cell): _____

(Email): _____

Attorney: SHELLY K. ALLAddress: 260 W. COLEMAN BLVD., STE. DMT. PLEASANT, SC 29464Telephone: (843) 971-1199Email: SHELLY@SCELDERLAW.COM

OF-STATE PROBATE ASSETS MUST BE DISCLOSED. NON-PROBATE PROPERTY NEED NOT BE DISCLOSED.

SCHEDULE A – REAL ESTATE. List below any real estate in Decedent's name alone or tenants in common (not as joint with right of survivorship or tenants in the entirety). Describe each property by listing its full address, tax map number, deed book and page, and description consistently (for example: house, lot, buildings, acreage). Also list oil/mineral rights and time shares if it is real property. If none, so state. If the property is encumbered, list the full fair market value of the property here and the encumbrance on the Encumbrance Schedule below. (For jointly owned property **with right of survivorship**, you may list in Schedule E.)

Item No.	Description	% owned by Decedent	Fair Market Value	Value of Decedent's interest
1.				
Tax Map Number:				
2.				
Tax Map Number:				
3.				
Tax Map Number:				

TOTAL SCHEDULE A

\$ _____

(also enter under recapitulation, page 1)

SCHEDULE B – STOCKS AND BONDS. List below all stocks and bonds in the Decedent's name alone or tenants in common (not as joint with right of survivorship). Identify each type of security and the number of shares. If none, so state. (For jointly owned property **with right of survivorship**, you may list in Schedule E.)

Item No.	Description	Face Value	Appraised Value
1.			
2.			
3.			
4.			

TOTAL SCHEDULE B

\$ _____

(also enter under recapitulation, page 1)

SCHEDULE C – CASH, BANK ACCOUNTS, NOTES RECEIVABLES. List all bank accounts owned by Decedent alone or as tenants in common (checking, savings, CDs, money market, brokerage, employment bonus, cash award, final paycheck, etc.), cash on hand, notes payable to Decedent, and survival action proceeds. If none, so state. List each separate account type and institution and last two digits of the account. (For jointly owned property **with right of survivorship**, you may list in Schedule E.)

Item No.	Description	Value
1.		
2.		
3.		

TOTAL SCHEDULE C

\$ _____

(also enter under recapitulation, page 1)

SCHEDULE D - LIFE INSURANCE (If none, so state.)

Part 1 - Life Insurance – List the insurance on the life of the Decedent which is payable to the Estate.

Item No.	Description	Value
1.		
2.		
3.		

TOTAL PART 1

\$ _____

(also enter under recapitulation, page 1)

(If more space is required, insert additional sheets of same size.)

Part 2 (OPTIONAL) - You may list here the insurance on the life of the Decedent which is payable to beneficiaries.

Item No.	Description	Beneficiary	Value
1.	Voya Financial Life Insurance Policy 8472620023	Jessie F. Crosby and Kelvin W. Crosby	
2.	Voya Financial Life Insurance Policy 8474805548	Robert E. Crosby and Rose M. Crosby	
3.			
4.			
5.			

TOTAL PART 2

(also enter under recapitulation, page 1)

\$ _____

SCHEDULE E - (OPTIONAL) JOINT WITH RIGHT OF SURVIVORSHIP— You may list below any non-probate property jointly owned by the Decedent with another **with right of survivorship**. List each separate account type and institution and the last two digits of each account.

Item No.	Description	Joint Owner(s)	Percentage Includible	Value of Decedent's Interest
1.	The Bank of South Carolina Acct. ending in 76 (see account update dated October 15, 2012, attached as Exhibit A)	Rose M. Walsh		
2.				
3.				

\$ _____

TOTAL SCHEDULE E

(also enter under recapitulation, page 1)

SCHEDULE F – OTHER MISCELLANEOUS ASSETS PAYABLE TO ESTATE. List below any tangible personal property, including household goods & furnishings, vehicles, boats/motors/trailers, mobile homes that are not de-titled (Include year/make/model/VIN, if applicable), airplanes, equipment, interest in a partnership or unincorporated business, articles or collections having either artistic or intrinsic value, including coins, guns, artwork, jewelry, etc., and any other miscellaneous probate items not listed elsewhere, including any digital assets. If none, so state. (For jointly owned tangible personal property **with right of survivorship**, you may list in Schedule E.)

Item No.	Description	Value
1.		
2.		
3.		
4.		
5.		

TOTAL SCHEDULE F

(also enter under recapitulation, page 1)

\$ _____

NOTE: FOR SCHEDULES G, H, AND I. LIST VALUES ONLY IF PAYABLE TO ESTATE.

SCHEDULE G – TRANSFERS DURING DECEDENT'S LIFE. List any transfers intended to take effect at death if such property is payable to the Estate. You may list in the "Optional" section below any non-probate transfers intended to take effect at death not payable to the Estate, including United States Government Bonds "Payable on Death," accounts which are "Transfer on Death," a trust created by Decedent in which income for life was retained by the Decedent, power to revoke or other incidents of ownership retained by the Decedent, lifetime transfers of real property in which Decedent retained life estate, etc. If none, so state.

List date and type of transfer and list total amount **payable to estate**:

1.		
2.		

(OPTIONAL) describe and list amounts **not payable to estate**:

1.		
2.		

TOTAL SCHEDULE G

(also enter under recapitulation, page 1)

\$ _____

(If more space is required, insert additional sheets of same size.)

SCHEDULE H – POWERS OF APPOINTMENT. List property, both real and personal, over which Decedent possessed a Power of Appointment whether testamentary or otherwise, if such property is payable to the Estate. You may list property subject to such power if it was not payable to the Estate in the "Optional" section below. If none, so state.

Describe and list total amount payable to estate:

1.		
2.		

(OPTIONAL) describe and list amounts not payable to estate:

1.		
2.		

TOTAL SCHEDULE H

(also enter under recapitulation, page 1)

\$ _____

SCHEDULE I – ANNUITIES AND RETIREMENT ACCOUNTS (IRA's, 401(K), etc.). List any annuities or retirement accounts owned by the Decedent and payable to the Estate. You may list in the "Optional" section below any accounts payable to a beneficiary which is not payable to the Estate.

Describe and list total amount payable to estate:

1.		
2.		
3.		

(OPTIONAL) describe and list amounts not payable to estate:

1.	CresCom IRA – Beneficiary is Rose Mae Walsh (see Traditional IRA Application dated March 28, 2005, attached hereto as Exhibit B)	
2.	Disabilities Board of Charleston County Retirement Plan – Beneficiary is Rose Mae Crosby n/k/a Rose Mae Walsh (see Employee's Plan Enrollment Form dated February 21, 1990, attached hereto as Exhibit C)	
3.		

TOTAL SCHEDULE I

(also enter under recapitulation, page 1)

\$ _____

ENCUMBRANCES (e.g., mortgages, liens, judgments, etc., but not general debts of the estate). List debts of the Decedent secured by assets on the above Schedules and describe the debt and the specific asset encumbered.

Item No.	Schedule & Item Number Encumbered Thereby	Description & Amount
1.		
2.		
3.		

TOTAL ENCUMBRANCES

(also enter under recapitulation, page 1)

\$ _____

(If more space is required, insert additional sheets of same size.)

THE BANK OF SOUTH CAROLINA

P.O. BOX 538
CHARLESTON, SC 29402

OWNERSHIP OF ACCOUNT - CONSUMER PURPOSE

☐ INDIVIDUAL

☒ JOINT - WITH SURVIVORSHIP (and not as tenants in common)

☐ JOINT - NO SURVIVORSHIP (as tenants in common)

☐ TRUST - SEPARATE AGREEMENT:

☐ REVOCABLE TRUST OR ☐ PAY-ON-DEATH
DESIGNATION AS DEFINED IN THIS AGREEMENT
Name and Address of Beneficiary:

REC'D OCT 1 5 2012

OWNERSHIP OF ACCOUNT - BUSINESS PURPOSE

☐ SOLE PROPRIETORSHIP

☐ CORPORATION: ☐ FOR PROFIT ☐ NOT FOR PROFIT

☐ PARTNERSHIP ☐

BUSINESS:
COUNTY & STATE
OF ORGANIZATION:

AUTHORIZATION DATED:

DATE OPENED 04/23/2001 BY Wanda Bossett (T)

INITIAL DEPOSIT \$ 1,997.40

☐ CASH ☐ CHECK ☐

HOME TELEPHONE # (343) 871-0864

BUSINESS PHONE #

DRIVER'S LICENSE # 000991404

E-MAIL N/A

EMPLOYER RETIRED

MOTHER'S MAIDEN NAME

Name and address of someone who will always know your location:

BACKUP WITHHOLDING CERTIFICATIONS

TIN: 249-50-2628

☒ TAXPAYER I.D. NUMBER - The Taxpayer Identification Number shown above (TIN) is my correct taxpayer identification number.

☒ BACKUP WITHHOLDING - I am not subject to backup withholding either because I have not been notified that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the Internal Revenue Service has notified me that I am no longer subject to backup withholding.

☐ EXEMPT RECIPIENTS - I am an exempt recipient under the Internal Revenue Service Regulations.

SIGNATURE: I certify under penalties of perjury the statements checked in this section and that I am a U.S. citizen or other U.S. person (defined in the instructions).

X

ACCOUNT NUMBER 200007076 PORTFOLIO NUMBER 6214

ACCOUNT OWNER(S) NAME & ADDRESS
ANNIE MAE CROSBY
ROSE M WALSH

3283 VON OSHEN ROAD
SUMMERVILLE, SC 29483

☐ NEW ☒ EXISTING

TYPE OF ACCOUNT ☒ CHECKING ☐ SAVINGS

☐ MONEY MARKET ☐ CERTIFICATE OF DEPOSIT

☐ NOW ☐

This is your (check one): SPECIAL CITIZEN'S
☒ Permanent ☐ Temporary account agreement.

Number of signatures required for withdrawal 1

FACSIMILE SIGNATURE(S) ALLOWED? ☐ YES ☒ NO

☒

SIGNATURE(S) - The undersigned certifies the accuracy of the information he/she has provided and acknowledges receipt of a completed copy of this form. The undersigned authorizes the financial institution to verify credit and employment history and/or have a credit reporting agency prepare a credit report on the undersigned, as individuals. The undersigned also acknowledge the receipt of a copy and agree to the terms of the following agreement(s) and/or disclosures(s)

☒ Terms & Conditions ☒ Truth in Savings ☒ Funds Availability

☒ Electronic Fund Transfers ☒ Privacy ☐ Substitute Checks

☐ Common Features ☐

(1): ☒

ANNIE MAE CROSBY

I.D.# 000991404 D.O.B. 05-23-1936

(2): ☒

ROSE M WALSH

I.D.# 008029917 D.O.B. 01-04-1960

(3): ☒

I.D.# D.O.B.

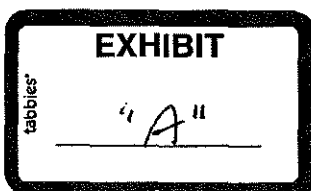
(4): ☒

I.D.# D.O.B.

☐ Authorized Signer Individual Accounts Only

☒

I.D.# D.O.B.



R. App. 000573

Traditional IRA Application

Community FirstBank
288 Meeting Street
Charleston, SC 29401

(Trustee's name, address, and phone number above)

1 IRA OWNER INFORMATION

NAME AND ADDRESS		IRA ACCOUNT NUMBER	
ANNIE M CROSBY 3283 VON OSHEN ROAD SUMMERVILLE, SC 29485(843) 871 0864		2198000050	
DAYTIME PHONE NUMBER		SOCIAL SECURITY NUMBER (SSN)	
		249-50-2628	
E-MAIL (OPTIONAL)		DATE OF BIRTH	GENDER
		05/03/1936	☐ Male ☒ Female

2 CONTRIBUTION INFORMATION

ACCOUNT NUMBER	AMOUNT	CONTRIBUTION DATE	TAX YEAR	FEE
2198000050	\$3,500.00	03/28/2005	2005	\$None

CONTRIBUTION TYPE:

☐ Regular/Spousal	☐ Rollover from a Traditional IRA or SIMPLE IRA
☒ Catch-Up (age 50 and older)	☐ Rollover from an Eligible Retirement Plan
☐ Simplified Employee Pension (SEP)	☐ Direct Rollover from an Eligible Retirement Plan
☐ Reclassification	☐ Transfer from a Traditional IRA or SIMPLE IRA

3 DESIGNATION OF BENEFICIARY

At the time of my death, the primary beneficiaries named below will receive my IRA assets. If all of my primary beneficiaries die before me, the contingent beneficiaries named below will receive my IRA assets. In the event a beneficiary dies before me, such beneficiary's share will be reallocated on a pro-rata basis to the other beneficiaries that share the deceased beneficiary's classification as a primary or contingent beneficiary. If all of the beneficiaries die before me, my IRA assets will be paid to my estate. If no percentages are assigned to beneficiaries, the beneficiaries will share equally. If the percentage total for each beneficiary classification does not equal 100 percent, any remaining percentage will be divided equally among the beneficiaries within such class. This designation revokes and supercedes all earlier beneficiary designations which may apply to this IRA.

A. Primary Beneficiary

PERCENTAGE	NAME OF BENEFICIARY	SSN OR TAXPAYER IDENTIFICATION NUMBER	RELATIONSHIP TO IRA OWNER	BENEFICIARY DATE OF BIRTH
100.00%	ROSE MAE WALSH		DAUGHTER	01/04/1980
%				
%				
Total 100%				

B. Contingent Beneficiary

PERCENTAGE	NAME OF BENEFICIARY	SSN OR TAXPAYER IDENTIFICATION NUMBER	RELATIONSHIP TO IRA OWNER	BENEFICIARY DATE OF BIRTH
%				
%				
%				
Total 100%				

4 SPOUSAL CONSENT

..... (IRA Owner Initials) I Am Married. I understand that if I designate a primary beneficiary other than my spouse, my spouse must consent by signing below.

..... (IRA Owner Initials) I Am Not Married. I understand that if I marry in the future, I must complete a new Designation of Beneficiary form, which includes the spousal consent documentation.

I am the spouse of the IRA owner. Because of the significant consequences associated with giving up my interest in the IRA, the trustee has not provided me with legal or tax advice, but has advised me to seek tax or legal advice. I acknowledge that I have received a fair and reasonable disclosure of the IRA owner's assets or property and any financial obligations for a community property state. In the event I have a legal interest in the IRA assets, I hereby give to the IRA owner such interest in the assets held in this IRA and consent to the beneficiary designation set forth in Section 3 of this form.

☒ Signature of Spouse Date ☒ Signature of Witness (if required) Date

5 SIGNATURES

I certify that the information provided by me on this Application is accurate, and that I have received a copy of IRS Form 5305, Individual Retirement Trust Account, a Disclosure Statement, and a Financial Disclosure. I agree to be bound by the terms and conditions found in the Agreement, Disclosure Agreement, Financial Disclosure, and amendments thereto. I assume sole responsibility for all consequences relating to my actions concerning this IRA. I understand that I may revoke this IRA on or before seven (7) days after the date of establishment. I have not received any tax or legal advice from the trustee, and I will seek the advice of my own tax or legal professional to ensure my compliance with related laws. I release and agree to hold the IRA trustee harmless against any and all claims for losses arising from my actions.

☒ Annie M. Crosby 3/28/2005
Signature of IRA Owner Date

☒ [Signature] 3/28/05
Signature of Trustee Date

EXHIBIT

"B"

R. App. 000574

EMPLOYEE'S
PLAN ENROLLMENT FORM

Name of Employee Annie Mae Crosby SSN 249-50-2628
Home Address 3283 Von-Oshon Rd City Summarville State SC Zip 29483
Employer Charleston County Mental Retardation Board EIN 570822353
Plan Name Chas. Co. M.R. Bd. Profit Sharing & Plan Trust Plan No. 001

=====
Completion of this form is vital to establishing proper records for the Plan so that you or your Beneficiary will receive all the benefits to which you are entitled. Feel free to discuss this form with the Plan Administrator. Give your completed form to the Plan Administrator.

Business Tel. No. 722-7547 Home Tel. No. 871-0864

Birth Date 5/2/36 Date Age 59-1/2 11/3/95 Date Age 70-1/2 11/3/06

Marital Status: ☐ Married ☒ Not Married

Spouse's Name _____ Spouse's Date of Birth _____

Date of Employment 5/2/87 Participation Entry Date _____

Are you an owner or shareholder of Employer? ☐ Yes ☒ No
If yes, what percentage of business or voting stock? _____%

Are you an officer of Employer? ☐ Yes ☒ No

Compensation category: ☒ Hourly ☐ Salaried ☐ Sales Commission

☐ Other (Specify): _____

I acknowledge receipt of the Summary Plan Description ("SPD") describing the Plan. I understand that the SPD is only a summary of the provisions of the Plan (including its Trust Agreement) and does not provide every detail that may be relevant to the determination of my rights under the Plan.

In the event of discrepancies between the descriptive material in the SPD and the provisions of the Plan (including amendments), I understand that the provisions of the Plan will control.

I understand that a copy of the Plan is available for inspection by me or my authorized representative at the offices of the Employer during normal business hours. I also understand a copy of the Plan will be provided to me upon request, subject to a reasonable photocopy charge.

Dated 3/4/91

Annie Mae Crosby
Signature of Employee

ADM 150

DESIGNATION OF BENEFICIARIES

PLAN NAME: _____

PARTICIPANT'S NAME: Annie Mae Crosby

I hereby designate the person or persons whose names appear on this form as my beneficiary or beneficiaries to receive benefits payable under the Plan in the event of my death, subject to the terms and conditions of the Plan. If I am married and have designated someone other than my spouse as my sole primary beneficiary, an executed Spouse's Consent must be signed. (If Unmarried, complete Statement of Unmarried participant.)

The Beneficiary is:

Primary: Rose Mae Crosby Daughter
(Name) (Relationship)

(Address)

g Jessie Crosby Son
(Name) (Relationship)

3283 Von-Oshen Rd Summerville S.C. Son
(Address)

if living at the time of my death, equally to the survivor or survivors,
or, if not living, then

Contingent: _____
(Name) (Relationship)

(Address)

(Name) (Relationship)

(Address)

equally to the survivor or survivors.

I hereby revoke all previous Designations of Beneficiaries under the Plan. I reserve the right to revoke or amend this Designation of Beneficiaries.

Annie Mae Crosby 2/21/90
Participant's Signature Date

3283 Von-Oshen Rd Summerville S.C.
Address

RETURN TO YOUR PLAN SPONSOR

OVER

R. App. 000576

STATEMENT OF UNMARRIED PARTICIPANT



I am not married.

Bernie Grace Crosby
Participant's Signature

2/21/90
Date

Marital Status verified by:

Plan Administrator

Date

SPOUSE'S CONSENT

I understand that:

1. My spouse has named a person other than myself to receive from the Plan upon my spouse's death.
2. The designation of beneficiary other than myself will result in all of the benefits payable from the Plan upon my spouse's death be paid to the named beneficiary rather than me.
3. If I do not voluntarily consent to my spouse's beneficiary designation, the designation will be invalid and I will receive the benefits which may be payable from the Plan upon my spouse's death.

I hereby consent to the beneficiary designation made by my spouse. This consent applies only to this beneficiary designation. If my spouse wishes to change the beneficiary, I must again consent to it before the change will be valid.

Participant's Spouse

Date

STATE OF _____)
COUNTY OF _____) ss

Subscribed and sworn to before me, a Notary Public in and for said County and State, this _____ day of _____, 19____.

Notary Public

My Commission Expires: _____

OR

The foregoing consent was signed before me this _____ day of _____, 19____.

R. App. 000577