

RECEIVED

Feb 01 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston
County Court of Common Pleas
Jennifer B. McCoy, Circuit Court Judge
Probate Court
Irvin G. Condon, Probate Judge
Tamara C. Curry, Associate Probate Judge

Appellate Case No. 2021-001152
Common Pleas Case No. 2020-CP-10-04036
Probate Case No. 2017-ES-10-01946

In the Matter of: The Estate of Roy E. Mevers, Jr.

South Carolina Attorney General, Respondent

v.

Minnie Lee Newman Mevers, Appellant

v.

J. James Duggan, as Special Administrator of The Estate of Roy
E. Mevers, Jr., Respondent.

**RESPONDENT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent South Carolina Attorney General designates the following to be included
in the Record on Appeal:

Orders, Judgments, Decrees, or Decisions

1. Order Granting Temporary Injunction filed June 29, 2020;
2. Order Denying Motion to Alter, Amend, and Vacate Order and Order Granting Motion for Removal to Circuit Court, filed September 10, 2020;
3. Form 4 Order denying Motion for Judgment on the Pleadings, filed December 22, 2020;
4. Temporary Restraining Order, filed March 13, 2020;

5. Certificate of Appointment of Special Administrator filed March 13, 2020;
6. Order Affirming Probate Court's Orders filed on September 10, 2021; and
7. Order of The Honorable Bentley D. Price, filed September 22, 2020.

Pleadings

8. South Carolina Attorney General's Verified Petition to Re-Open Estate, filed March 13, 2020, with exhibits;
9. South Carolina Attorney General's Verified Motion for Continuance of the Temporary Injunction Issued by the Probate Court or, in the alternative, Issuance of a Temporary Injunction, filed September 16, 2020, with exhibits;
10. South Carolina Attorney General's Reply to Return to Petition and Answer to Cross-Claims and Third-Party Claims, dated May 8, 2020;
11. Notice of Intent to Appeal to the Circuit Court filed in Circuit Court on September 11, 2020;
12. Brief of Appellant filed on November 20, 2020;
13. Brief of Respondent South Carolina Attorney General filed on January 20, 2021; and
14. Reply Brief of Appellant filed on February 1, 2021;

Transcripts

15. Transcript of Hearing before The Honorable Irvin G. Condon on March 23, 2020;

Other Materials or Documents

16. South Carolina Attorney General's Motion for Temporary Restraining Order, filed March 13, 2020;
17. Motion to Remove Action to Circuit Court, filed May 12, 2020;
18. Motion to Alter, Amend, and/or Vacate Order, filed July 10, 2020;
19. Motion to Vacate Order filed August 28, 2020;
20. Verified Motion for Continuance of the Temporary Injunction issued by Probate Court or, in the alternative, Issuance of a Temporary Injunction, filed September 16, 2020, with exhibits;
21. Application for Informal Probate filed on November 13, 2017;
22. Amended Inventory and Appraisement filed May 25, 2018;
23. Proposal for Distribution filed November 21 2018;
24. Final Accounting filed November 30, 2018;
25. Articles of Incorporation for The "Sonny Mevers" Foundation, filed July 23, 2004;
26. Bylaws of The "Sonny Mevers" Foundation, dated July 2004;
27. Affidavit of Christopher Moss;
28. Affidavit of Jessica Wentworth;
29. Bank records; and
30. Letter from Stephen L. Brown to The Honorable Jennifer B. McCoy dated

March 30, 2021.

31. Letter from Stephen Brown to the Honorable Irvin G. Condon on June 1, 2020, with Exhibits.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

By: s/Mary Frances Jowers
SOUTH CAROLINA ATTORNEY GENERAL
ALAN WILSON (S.C. Bar No. 71754)
Attorney General
W. JEFFREY YOUNG (S.C. Bar No. 5747)
Chief Deputy Attorney General
ROBERT D. COOK (S.C. Bar No. 1373)
Solicitor General
C. HAVIRD JONES, JR. (S.C. Bar No. 3178)
Senior Assistant Deputy Attorney General
MARY FRANCES JOWERS (S.C. Bar No. 68413)
Assistant Deputy Attorney General
KRISTIN SIMONS (S.C. Bar No. 74004)
Assistant Attorney General
REBECCA M. HARTNER (S.C. Bar No. 101302)
Assistant Attorney General
P.O. Box 11549
Columbia, South Carolina 29211
(803) 734-3680

-and-

CLEMENT RIVERS, LLP
C. Michael Branham (S.C. Bar No. 857)
Stephen L. Brown (S.C. Bar No. 66468)
25 Calhoun Street, Suite 400
Charleston, SC 29401
P.O. Box 993, Charleston, SC 29402
(843) 720-5488
Special Counsel for the Respondent, The Attorney
General of The State of South Carolina

RECEIVED

Feb 01 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston
County Court of Common Pleas
Jennifer B. McCoy, Circuit Court Judge
Probate Court
Irvin G. Condon, Probate Judge
Tamara C. Curry, Associate Probate Judge

Appellate Case No. 2021-001152
Common Pleas Case No. 2020-CP-10-04036
Probate Case No. 2017-ES-10-01946

In the Matter of: The Estate of Roy E. Mevers, Jr.

South Carolina Attorney General, Respondent

v.

Minnie Lee Newman Mevers, Appellant

v.

J. James Duggan, as Special Administrator of The Estate of Roy
E. Mevers, Jr., Respondent.

PROOF OF SERVICE

I, Mary Frances Jowers, certify I served the within **Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal** on Appellant by email and by depositing a copy in the United States mail, postage prepaid, addressed to:

Daniel F. Blanchard, III, Esquire
Rosen Hagood, LLC
151 Meeting Street, Suite 400
Post Office Box 893
Charleston, SC 29402
dblanchard@rosenhagood.com

J. James Duggan, Esquire
Duggan Law Firm, LLC
44 Markfield Drive, Suite E
Charleston, SC 29407
duggan@dugganlawfirm.com

The Initial Brief and Designation of Matter have also been e-mailed to the Court of Appeals for electronic filing.

I further certify that all parties required by Rule to be served have been served.

This 1st day of February, 2022.

s/Mary Frances Jowers
Mary Frances Jowers
Assistant Deputy Attorney General



RECEIVED

Feb 01 2022

SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

February 1, 2022

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
By e-filing only

Re: In the Matter of: The Estate of Roy E. Mevers, Jr.
Appellate Case No. 2021-001152

Dear Ms. Kitchings:

Please find enclosed for electronic filing the following:

1. Initial Brief of Respondent,
2. Respondent's Designation of Matter to be Included in Record on Appeal, and
3. Proof of Service.

We appreciate your filing these and returning the clocked-in copies to us.

Yours very truly,

Mary Frances Jowers
Assistant Deputy Attorney General

Enclosures
cc with enclosures (via US Mail and email):
Daniel F. Blanchard, III, Esq.
J. James Duggan, Esq.