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Apr 11 2022

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

The Honorable Marvin H. Dukes, III
Beaufort County
Trial Court Case No. 2020-CP-07-0231

APPELLATE CASE NO. 2022-000277

Georgia Harrison, Barbara Harrison,
Joyce Ellen Harrison, William S. Harrison III,
Stanley Roberts, and
Diana Mendheim, Individually and As Attorney In Fact,

Respondents,

vs.

Stephanie Lorraine Kirkland, Gary Lamont Kirkland,
Kieta Nicole White, and Cheryl Kirkland,

Appellants.

**RESPONDENTS' RETURN TO APPELLANTS' MOTION
TO HOLD OR RECALL REMITTITUR AND TO REINSTATE
APPEAL AND TO EXTEND TIME FOR FILING
PROOF OF SERVICE**

INTRODUCTION

Currently pending before this Court is the Appellants' Motion To Hold Or Recall Remittitur And To Reinstate Appeal and To Extend Time For Filing Proof Of Service, as was filed

on April 1, 2022. The Motion should be denied because no good cause to reinstate the appeal has been shown as required under SCACR 260.

FACTUAL BACKGROUND

The Notice of Appeal in this case was filed on March 9, 2022 at 10:03 a.m. via an email filing from Appellants' Counsel Charles E. Houston, Jr. At that time, Mr. Houston's email transmittal came from his filed AIS e-mail address of chouston@houstonlawfirm.net. No Proof of Service as required by SCACR 203(d)(1)(B)(i) was filed with the Notice of Appeal, nor were copies of the orders and judgments being challenged, as required by SCACR 203(d)(1)(B)(ii). The Clerk of the Court of Appeals acknowledged Mr. Houston's filing by return email to his AIS email address, chouston@houstonlawfirm.net, at 10:15 AM that same day.

Several hours later, at 4:52 p.m. on March 9, 2022, the Appellants filed an Amended Notice of Appeal, attaching copies of the orders and judgments being challenged, but still not attaching nor filing a Proof of Service of either the Notice of Appeal nor the Amended Notice of Appeal. That filing email also emanated from Mr. Houston's AIS email of chouston@houstonlawfirm.net. The Clerk of the Court of Appeals acknowledged Mr. Houston's filing of his Amended Notice of Appeal by return email to his AIS email address, chouston@houstonlawfirm.net, at 10:15 AM that same day.

On March 13, 2022 at 7:36 a.m., Mr. Houston emailed a corrected Amended Notice of Appeal to the Court, again from his AIS email address, chouston@houstonlawfirm.net. The Clerk of the Court of Appeals acknowledged Mr. Houston's filing of the corrected Amended Notice of Appeal by return email to chouston@houstonlawfirm.net, his AIS email address, at 9:00 a.m. on March 14, 2022.

On March 18, 2022, the Clerk of the Court of Appeals, pursuant to The Supreme Court's standing Order of August 25, 2021 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules," which provides that "An appellate court may send an order, opinion or other correspondence to a person admitted to practice law in South Carolina using that lawyer's primary e-mail address in AIS."), sent an email deficiency letter to Mr. Houston at both his AIS-designated, and well-used, e-mail account chouston@houstonlawfirm.net, and to another email address of charleshouston@icloud.com, advising him that his original Notice of Appeal did not include a Proof of Service, and that one had not been received as of March 18, 2022. The Clerk's deficiency letter went on to warn Mr. Houston and the Appellants that "this deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed...." See attached Exhibit A, the email communication and the deficiency letter. See also attached Exhibit B, a copy of Mr. Houston's AIS information setting his declared email as chouston@houstonlawfirm.net.

The March 18, 2022 email from the Clerk's office was received and acted upon by the Respondents' counsel, as it also contained a letter advising Respondents that we were to file a Return to the Appellants' Motion To Stay within ten (10) days of the March 18, 2022 letter and that Return was properly filed on March 29, 2022.

The Appellants did not file the required Proof of Service of the Notice of Appeal by March 29, 2022, and the Respondents thus filed a Motion To Dismiss that day, based upon the Appellants' failure to comply with the Court's rules and the directive of the Clerk. The Motion to Dismiss was electronically filed with the Clerk, along with a Proof of Service, and copied to Mr. Houston at his chouston@houstonlawfirm.net email address on March 29, 2022 at 1:28 p.m. See Exhibit C. The

Clerk's Office emailed Mr. Houston, and Respondents' counsel, at 3:34 p.m. on March 29, 2022, advising that the Motion To Dismiss had been filed. See Exhibit D.

On March 31, 2022, the Court filed its Order dismissing the appeal because "Appellants have still failed to file a proof of service." On April 1, 2022, the Appellants filed the pending Motion To Hold or Recall Remittitur And To Reinstate Appeal and To Extend Time For Filing Proof Of Service, alleging the Order is "based on an error of fact."

ARGUMENT AND CITATION OF AUTHORITY

By their Motion, the Appellants seek to reinstate a dismissed appeal. Rule 260 SCACR controls dismissals and reinstatements and provides that the Clerk shall issue an order of dismissal "[w]henever it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules...." Rule 260 SCACR It further provides that "A case shall not be reinstated except by leave of court, upon good cause shown, after notice to all parties."

Thus, the determinative question is whether the Appellants have demonstrated "good cause" for having failed to initially file the requisite Proof of Service and having ignored the Clerk's deficiency letter of March 18, 2022 that clearly was properly served upon Mr. Houston by delivery to his wellcommonly-used and AIS-designated email account of chouston@houstonlawfirm.net.

To tryIn an attempt to establish the necessary threshold of "good cause," Mr. Houston asserts in his Affidavit that he "examined the Court's records on C-track and note that the letter dated March 118, 2022, which I did not receive, was transmitted to me only via United States Mail and not via email." [Emphasis in the original.] See Proof/Affidavit of Service of Mr. Houston, paragraph 6. He then states that because he did not receive a US Mail letter copy of the Clerk's

March 18, 2022 letter, “I was unaware of the Court’s request to file a Proof of Service of the Notice of Appeal.” See paragraph 7.

Respectfully, these assertions are simply inaccurate and are not true. The Clerk’s March 18, 2022 deficiency letter was sent via e-mail attachment to Mr. Houston’s AIS-listed email address as is shown on Exhibit B, pursuant to the Supreme Court’s Order on electronic transmission. This is the exact same way the Clerk has communicated with Mr. Houston and Respondents’ counsel on numerous occasions both prior to and after March 18, 2022. It is the exact way the Order of Dismissal was served upon the Appellants’ counsel on March 31, 2022, which Mr. Houston responded to by this Motion on April 1, 2022. And, perhaps most importantly to the overall consideration of the Motion, the Appellants have misstated both what the March 31, 2022 Order states concerning the March 18, 2022 deficiency letter and what the “C-track” system shows about that letter.

The Court’s Order of Dismissal does not assert that the Clerk mailed the March 18, 2022 deficiency letter in US Mail, as is asserted in Mr. Houston’s Affidavit. It simply says the Appellants were notified by letter of March 18, 2022, which they were — via e-mail attachment as is normal this day and time. Further, the “C-track” system does not “note” that the March 18, 2022 letter “was transmitted to me [Mr. Houston] only via United States Mail and not via email” as is alleged by Mr. Houston in his Affidavit at paragraph 6. That is simply untrue. A review of the “C-track” system, as is shown on Exhibit E, shows that the deficiency letter of March 18, 2022 was simply served that day, which it was, via email. There is nothing on the C-track system indicating US Mail delivery, and certainly nothing that shows only US Mail delivery.

Perhaps most enlightening to this issue is the fact that Appellants’ counsel does not assert in his Affidavit that he did not receive the deficiency letter through his email account, which he

acknowledges in his Affidavit repeatedly, is the method of service of both pleadings and notices used in this appeal. His single assertion of “good cause” rests upon a facially unsupportable claim that the deficiency letter was lost in the US Mail; however, it was never placed in the US Mail by the Clerk and thus could not have been lost. It was served upon the Appellants’ counsel via email transmittal, that was also addressed to, delivered to, and received by, both of Respondents’ counsel.

The For whatever reason, the Appellants did failfailed or refused to comply with this Court’s rules regarding the necessity of prompt filing of a Proof of Service of the Notice of Appeal, and then ignored the Clerk’s deficiency letter of March 18, 2022, which was properly served upon Appellants’ counsel’s counsel through his AIS e-mail address. No good cause for ignoring the e-mail warning or the rules having been shown, the Motion to Reinstate should be denied.

Respectfully submitted this 11th day of April, 2022.

LAW OFFICE OF THOMAS C. TAYLOR,
LLC

s/Thomas C. Taylor
Thomas C. Taylor
Attorney for Plaintiffs
SC Bar No.: 5499
PO Box 5550
Hilton Head Island, SC 29938
1-843-785-5050
tom@thomastaylorlaw.com

LAW OFFICE OF CHESTER C.
WILLIAMS, LLC

s/Chester C. Williams
Chester C. Williams
Attorney for Plaintiffs
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PO Box 6028
Hilton Head Island, Sc 29938-6028
1-843-842-5411
firm@ccwlaw.net

Hilton Head Island, South Carolina
April 11, 2022

Tom Taylor

From: Singleton, Mary C. <msingleton@sccourts.org>
Sent: Friday, March 18, 2022 5:00 PM
To: chouston@houstonlawfirm.net; Tom Taylor; firm@ccwlaw.net
Cc: charlesehouston@icloud.com; bramspoint@outlook.com
Subject: Georgia Harrison v. Stephanie Kirkland//2022-000277
Attachments: Harrison v. Kirkland - Deficiency Letter.pdf; Harrison v. Kirkland - Request Return Letter.pdf

Dear Counsel:

Attached please find correspondence from the Court of Appeals.

Sincerely,

Mary-Caitlyn Singleton

Appeals Specialist
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201
Ph: (803) 734-1890
F: (803) 734-1839
E-Filing Email: ctappfilings@sccourts.org

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# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
CHIEF DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29211  
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[www.sccourts.org](http://www.sccourts.org)

March 18, 2022

Mr. Charles E. Houston, Jr., Esquire  
1000 Main Street Suite 200 C  
Hilton Head Island SC 29926

Re: Georgia Harrison v. Stephanie Kirkland  
Appellate Case No. 2022-000277

Dear Counsel:

Upon reviewing your notice of appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and this deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Jamison, deputy".

CLERK

cc: Thomas C Taylor, Esquire  
Chester C. Williams, Esquire



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
CHIEF DEPUTY CLERK

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March 18, 2022

Mr. Charles E. Houston, Jr., Esquire  
1000 Main Street Suite 200 C  
Hilton Head Island SC 29926

Re: Georgia Harrison v. Stephanie Kirkland  
Appellate Case No. 2022-000277

Dear Counsel:

This will acknowledge receipt of your motion to stay.

By copy of this letter, opposing counsel is requested to file a return to this motion no later than ten (10) days from the date of this letter.

The time limits for perfecting the appeal will be held in abeyance pending the Court's decision.

Very truly yours,

*V. Claire Allen*

CLERK

cc: Thomas C Taylor, Esquire  
Chester C. Williams, Esquire

## *Attorney Information Search*

**Name:**

Mr. Charles E. Houston, Jr.

**Bar Number:**

2663

**Organization:**

The Houston Law Firm, LLC

**Address:**

1000 Main Street Suite 200 C

Hilton Head Island, SC 29926

**County:**

Beaufort

**Email Address:**

[chouston@houstonlawfirm.net](mailto:chouston@houstonlawfirm.net)

**Business Phone:**

(843) 715-2230

**Fax Number:**

**Law School:**

North Carolina Central University

**Graduation Year:**

1968

**SC Admission Date:**

December 05, 2000

**SC Bar Membership Class:**

Regular Member

**SC Bar Membership Status:**

Good Standing

**Contact Info**

Mr. Charles E. Houston, Jr.  
The Houston Law Firm, LLC  
1000 Main Street Suite 200 C  
Hilton Head Island, SC 29926  
[chouston@houstonlawfirm.net](mailto:chouston@houstonlawfirm.net)  
(843) 715-2230

**New Search**

**Tom Taylor**

---

**From:** Tom Taylor  
**Sent:** Tuesday, March 29, 2022 1:28 PM  
**To:** 'msingleton@sccourts.org'; 'ctappfilings@sccourts.org'  
**Cc:** Law Office of Chester C. Williams; 'Andre J. White'; Charles E. Houston; tfinger@fingerlaw.com; Tom Johnson; Donna P. Taylor, Legal Assistant (donna@thomastaylorlaw.com)  
**Subject:** Motion to Dismiss in Harrison v. Kirkland, Case no. 2022-000277  
**Attachments:** Motion to Dismiss 3.29.2022.pdf; Exhibit A to Respondents' Motion to Dismiss, 3.29.2022.pdf; Taylor to Caitlyn Singleton in Court of Appeals with Motion to Dismiss in 2022-000277, 3.29.2022.pdf; Taylor executed Proof of Service on Motion to Dismiss in 2022-000277, 3.29.2022.pdf

Ms. Singleton—Good afternoon. On behalf of the Respondents, please see the attached Motion to Dismiss, Exhibit A and Proof of Service that I ask you to file today. I am placing a check for the requisite \$50 filing fee made payable to the Court of Appeals, in the US Mail today along with the original of the cover letter.

Would you please electronically file the Motion, Exhibit A and Proof of Service this afternoon? Thank you very much.

Tom Taylor

*Thomas C. Taylor*

Law Office of Thomas C. Taylor, LLC  
22 Bow Circle, Suite A  
Hilton Head, SC 29928  
843-785-5050 (office)  
843-785-5030 (fax)  
843-301-6900 (cell)

Mailing Address:  
P.O. Box 5550  
Hilton Head, SC 29938

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ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,  
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT  
COURT MEDIATOR

LAW OFFICE OF  
**THOMAS C. TAYLOR, LLC**

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www.thomastaylorlaw.com • tom@thomastaylorlaw.com

MAILING ADDRESS  
P.O. BOX 5550  
HILTON HEAD ISLAND, SC  
29938

March 29, 2022

**Via US Mail and E-Mail Attachment to: msingleton@sccourts.org**

Ms. Mary-Caitlyn Singleton,  
SC Court of Appeals Specialist  
1220 Senate Street  
Columbia, SC 29201

**Re: Georgia Harrison, et al. vs. Stephanie Lorraine Kirkland, et al.; Appellate Case  
No.: 2022-000277; Respondents' Motion to Dismiss Appeal**

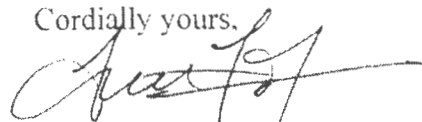
Dear Ms. Singleton,

As your file indicates, Chet Williams and I represent the Respondents in this appeal. On behalf of the Respondents, I attach hereto for electronic filing the following:

- a. Respondents' Motion to Dismiss Appeal;
- b. Exhibit A; and,
- c. Proof of Service of a copy of the documents upon Appellants' counsel.

I am also enclosing a check for the \$50 filing fee today via US Mail. Please let me know if you have any questions. Thank you as always for your professionalism in these matters.

Cordially yours,



Thomas C. Taylor

TCT/dpt

Enclosures

cc: Chester C. Williams, Esq., via email transmittal  
Andre J. White, via email transmittal  
Charles E. Houston, Esq., via email transmittal  
Terry A. Finger, Esq., via email transmittal  
Darrell Thomas Johnson, Jr., via email transmittal

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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The Honorable Marvin H. Dukes, III  
Beaufort County  
Trial Court Case No. 2020-CP-07-0231

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APPELLATE CASE NO. 2022-000277

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Joyce Ellen Harrison, William S. Harrison III,  
Stanley Roberts, and  
Diana Mendheim, Individually and As Attorney In Fact,

Respondents,

vs.

Stephanie Lorraine Kirkland, Gary Lamont Kirkland,  
Kieta Nicole White, and Cheryl Kirkland,

Appellants.

---

**RESPONDENTS' MOTION TO DISMISS APPEAL**

---

Appellants filed their Notice of Appeal on March 9, 2022, and then filed an Amended Notice of Appeal on March 14, 2022. On March 18, 2022, the Clerk of Court issued a letter to Appellants' Counsel advising that a Proof Of Service had not been provided with the Notice of Appeal, and instructed the Appellants' counsel that if the deficiency was not corrected within ten

(10) days of March 18, 2022, the appeal would be dismissed. A true and correct copy of the Clerk's letter is attached hereto as Exhibit A.

There having been no Proof of Service filed, the Respondents move the Court to dismiss the appeal immediately.

Respondents advise the Court that because this Motion To Dismiss is based solely upon the Rules and the March 18, 2022 letter of the Clerk, no memorandum nor Affidavits are appropriate to be filed.

WHEREFORE, the Respondents move the Court to Dismiss the Appeal.

LAW OFFICE OF THOMAS C. TAYLOR,  
LLC

*s/Thomas C. Taylor*

Thomas C. Taylor  
Attorney for Plaintiffs  
SC Bar No.: 5499  
PO Box 5550  
Hilton Head Island, SC 29938  
1-843-785-5050  
[tom@thomastaylorlaw.com](mailto:tom@thomastaylorlaw.com)

LAW OFFICE OF CHESTER C.  
WILLIAMS, LLC

*s/Chester C. Williams*

Chester C. Williams  
Attorney for Plaintiffs  
17 Executive Park Road, Suite 2  
PO Box 6028  
Hilton Head Island, Sc 29938-6028  
1-843-842-5411  
[firm@ccwlaw.net](mailto:firm@ccwlaw.net)

Hilton Head Island, South Carolina  
March 29, 2022



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
CHIEF DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29211  
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March 18, 2022

Mr. Charles E. Houston, Jr., Esquire  
1000 Main Street Suite 200 C  
Hilton Head Island SC 29926

Re: Georgia Harrison v. Stephanie Kirkland  
Appellate Case No. 2022-000277

Dear Counsel:

Upon reviewing your notice of appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and this deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Jamieson, deputy".

CLERK

cc: Thomas C Taylor, Esquire  
Chester C. Williams, Esquire

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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The Honorable Marvin H. Dukes, III  
Beaufort County  
Trial Court Case No. 2020-CP-07-0231

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APPELLATE CASE NO. 2022-000277

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Georgia Harrison, Barbara Harrison,  
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vs.

Stephanie Lorraine Kirkland, Gary Lamont Kirkland,  
Kieta Nicole White, And Cheryl Kirkland,

Appellants.

---

PROOF OF SERVICE

---

I hereby certify that this law firm represents the Respondents in the above-captioned matter and that on the date below, in Hilton Head Island, South Carolina, I served a copy of the forgoing on the following person via U.S. Mail, first class postage pre-paid, and electronic mail to his AIS E-mail address:


**Documents Served: RESPONDENTS' MOTION TO DISMISS APPEAL**

**Parties Served:**

Charles E. Houston, Esquire  
The Houston Law Firm, LLC  
1000 Main Street, Suite 200C  
Hilton head Island, SC 29926;  
chouston@houstonlawfirm.net

**ATTORNEY FOR APPELLANTS**

LAW OFFICE OF THOMAS C. TAYLOR, LLC



Thomas C. Taylor  
SC Bar No.: 5499

Law Office of Thomas C. Taylor, LLC  
PO Box 5550

Hilton Head Island, SC 29938

843-785-5050

[tom@thomastaylorlaw.com](mailto:tom@thomastaylorlaw.com)

**ATTORNEY FOR RESPONDENTS**

Hilton Head Island, South Carolina  
March 29, 2022

**Tom Taylor**

---

**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Sent:** Tuesday, March 29, 2022 3:34 PM  
**To:** Tom Taylor; Singleton, Mary C.; Court Of Appeals Filings  
**Cc:** Law Office of Chester C. Williams; Andre J. White; Charles E. Houston; Finger, Terry A.; Tom Johnson; Donna Taylor  
**Subject:** RE: Motion to Dismiss in Harrison v. Kirkland, Case no. 2022-000277  
**Attachments:** Harrison v. Stephanie Kirkland- POS .pdf; Harrison v. Stephanie Kirkland- Ltr .pdf; Harrison v. Stephanie Kirkland- Ex.A .pdf; Harrison v. Stephanie Kirkland- Motion to Dismiss.pdf

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**From:** Tom Taylor <tom@thomastaylorlaw.com>  
**Sent:** Tuesday, March 29, 2022 1:28 PM  
**To:** Singleton, Mary C. <msingleton@sccourts.org>; Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Law Office of Chester C. Williams <firm@ccwlaw.net>; Andre J. White <andrewwhite@mitchelville.com>; Charles E. Houston <chouston@houstonlawfirm.net>; Finger, Terry A. <tfinger@fingerlaw.com>; Tom Johnson <tom@johnsonslawoffice.com>; Donna Taylor <donna@thomastaylorlaw.com>  
**Subject:** Motion to Dismiss in Harrison v. Kirkland, Case no. 2022-000277

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Ms. Singleton—Good afternoon. On behalf of the Respondents, please see the attached Motion to Dismiss, Exhibit A and Proof of Service that I ask you to file today. I am placing a check for the requisite \$50 filing fee made payable to the Court of Appeals, in the US Mail today along with the original of the cover letter.

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*Thomas C. Taylor*

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843-301-6900 (cell)

Mailing Address:  
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Hilton Head, SC 29938

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IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

The Honorable Marvin H. Dukes, III
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RECEIVED
Mar 29 2022
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Stanley Roberts, and
Diana Mendheim, Individually and As Attorney In Fact,

Respondents,

vs.

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Appellants.

RESPONDENTS' MOTION TO DISMISS APPEAL

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LAW OFFICE OF THOMAS C. TAYLOR,
LLC

s/Thomas C. Taylor

Thomas C. Taylor
Attorney for Plaintiffs
SC Bar No.: 5499
PO Box 5550
Hilton Head Island, SC 29938
1-843-785-5050
tom@thomastaylorlaw.com

LAW OFFICE OF CHESTER C.
WILLIAMS, LLC

s/Chester C. Williams

Chester C. Williams
Attorney for Plaintiffs
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Hilton Head Island, Sc 29938-6028
1-843-842-5411
firm@ccwlaw.net

Hilton Head Island, South Carolina
March 29, 2022

LAW OFFICE OF
THOMAS C. TAYLOR, LLC

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT
COURT MEDIATOR

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HILTON HEAD ISLAND, SC
29928

RECEIVED

Mar 29 2022

SC Court of Appeals

March 29, 2022

Via US Mail and E-Mail Attachment to: msingleton@sccourts.org

Ms. Mary-Caitlyn Singleton,
SC Court of Appeals Specialist
1220 Senate Street
Columbia, SC 29201

**Re: Georgia Harrison, et al. vs. Stephanie Lorraine Kirkland, et al.; Appellate Case
No.: 2022-000277; Respondents' Motion to Dismiss Appeal**

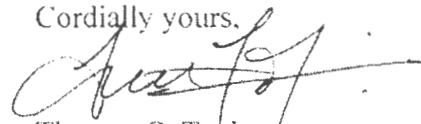
Dear Ms. Singleton,

As your file indicates, Chet Williams and I represent the Respondents in this appeal. On behalf of the Respondents, I attach hereto for electronic filing the following:

- a. Respondents' Motion to Dismiss Appeal;
- b. Exhibit A; and,
- c. Proof of Service of a copy of the documents upon Appellants' counsel.

I am also enclosing a check for the \$50 filing fee today via US Mail. Please let me know if you have any questions. Thank you as always for your professionalism in these matters.

Cordially yours,



Thomas C. Taylor

TCT/dpt

Enclosures

cc: Chester C. Williams, Esq., via email transmittal
Andre J. White, via email transmittal
Charles E. Houston, Esq., via email transmittal
Terry A. Finger, Esq., via email transmittal
Darrell Thomas Johnson, Jr., via email transmittal



The South Carolina Court of Appeals

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March 18, 2022

Mr. Charles E. Houston, Jr., Esquire
1000 Main Street Suite 200 C
Hilton Head Island SC 29926

RECEIVED

Mar 29 2022

SC Court of Appeals

Re: Georgia Harrison v. Stephanie Kirkland
Appellate Case No. 2022-000277

Dear Counsel:

Upon reviewing your notice of appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and this deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Jamison, deputy".

CLERK

cc: Thomas C Taylor, Esquire
Chester C. Williams, Esquire

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Mar 29 2022

SC Court of Appeals

The Honorable Marvin H. Dukes, III
Beaufort County
Trial Court Case No. 2020-CP-07-0231

APPELLATE CASE NO. 2022-000277

Georgia Harrison, Barbara Harrison,
Joyce Ellen Harrison, William S. Harrison III,
Stanley Roberts and
Diana Mendheim Individually And As Attorney In Fact,

Respondents,

vs.

Stephanie Lorraine Kirkland, Gary Lamont Kirkland,
Kieta Nicole White, And Cheryl Kirkland,

Appellants.

PROOF OF SERVICE

I hereby certify that this law firm represents the Respondents in the above-captioned matter and that on the date below, in Hilton Head Island, South Carolina. I served a copy of the forgoing on the following person via U.S. Mail, first class postage pre-paid, and electronic mail to his AIS E-mail address:


Documents Served: RESPONDENTS' MOTION TO DISMISS APPEAL

Parties Served:

Charles E. Houston, Esquire
The Houston Law Firm, LLC
1000 Main Street, Suite 200C
Hilton head Island, SC 29926;
chouston@houstonlawfirm.net

ATTORNEY FOR APPELLANTS

LAW OFFICE OF THOMAS C. TAYLOR, LLC



Thomas C. Taylor
SC Bar No.: 5499
Law Office of Thomas C. Taylor, LLC
PO Box 5550
Hilton Head Island, SC 29938
843-785-5050
tom@thomastaylorlaw.com

ATTORNEY FOR RESPONDENTS

Hilton Head Island, South Carolina
March 29, 2022

03/13/2022 Notice of Appeal (Civil) - Initial (CORRECTED)



03/09/2022 Notice of Appeal (Civil) - Initial



IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Apr 11 2022
SC Court of Appeals

The Honorable Marvin H. Dukes, III
Beaufort County
Trial Court Case No. 2020-CP-07-0231

APPELLATE CASE NO. 2022-000277

Georgia Harrison, Barbara Harrison,
Joyce Ellen Harrison, William S. Harrison III,
Stanley Roberts and
Diana Mendheim Individually And As Attorney In Fact,

Respondents,

vs.

Stephanie Lorraine Kirkland, Gary Lamont Kirkland,
Kieta Nicole White, And Cheryl Kirkland,

Appellants.

PROOF OF SERVICE

I hereby certify that this law firm represents the Respondents in the above-captioned matter and that on the date below, in Hilton Head Island, South Carolina, I served a copy of the forgoing on the following person by email to his AIS email address as follows:

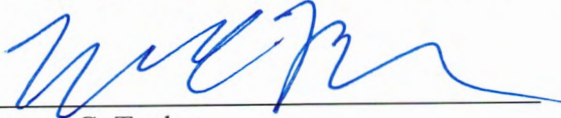
Documents Served: RESPONDENTS' RETURN TO APPELLANTS' MOTION TO HOLD OR RECALL REMITTITUR AND TO REINSTATE APPEAL AND TO EXTEND TIME FOR FILING PROOF OF SERVICE

Parties Served:

Charles E. Houston, Esquire
The Houston Law Firm, LLC
1000 Main Street, Suite 200C
Hilton head Island, SC 29926
Served by email to: chouston@houstonlawfirm.net

ATTORNEY FOR APPELLANTS

LAW OFFICE OF THOMAS C. TAYLOR, LLC



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tom@thomastaylorlaw.com

ATTORNEY FOR RESPONDENTS

Hilton Head Island, South Carolina
April 11, 2022