

RECEIVED

Apr 25 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' OBJECTION TO APPELLANTS' REPLY TO RESPONDENTS'
RETURN IN OPPOSITION TO APPELLANT'S MOTION TO HOLD OR RECALL
REMITTUR AND TO REINSTATE APPEAL and TO EXTEND TIME FOR FILING
PROOF OF SERVICE**

The Respondents object to the late filing of, and the Court's consideration of, the Appellants' Reply To Respondents' Return In Opposition To Appellant's Motion To Hold Or Recall Remittitur And To Reinstate Appeal and To Extend Time For Filing Proof Of Service, as was emailed to the Court on April 23, 2022 for filing.

The Appellants' pending Motion was filed on April 1, 2022. As per SCACR 240, the Respondents timely filed their Return and Proof of Service on April 11, 2022, and filed their Amended Return (correcting typographical errors) and Proof of Service on April 12, 2022. Thus,

further pursuant to Rule 240, the Appellants' Reply was due to be filed on or before April 18, 2022, because April 17, 2022 was a Sunday. The Appellants failed to file their Reply in a timely manner and the Reply should not be considered.

If the Court considers the Reply, the Respondents call the Court's attention to paragraph 2 of page 3 of the Respondents' Return, wherein the Respondents specifically advised the Court that

[t]he 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.

Clearly, then, Appellants' counsel's assertion in the Reply that the Respondents' "lengthy rebuttal is absent of any recognition that they as Respondents' counsels, in fact, received a copy of this letter from the court by e-mail or mail through the USPS" is simply untrue.

Respondents urge the Court to decline consideration of the late Reply and deny the pending Motion.

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
17 Executive Park Road, Suite 2
PO Box 6028
Hilton Head Island, Sc 29938-6028
1-843-842-5411
firm@ccwlaw.net

Hilton Head Island, South Carolina
April 23, 2022

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Apr 25 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:

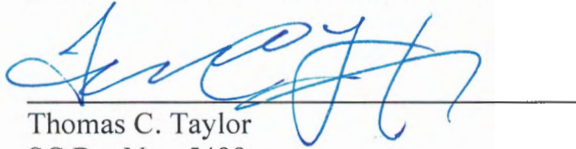
**Documents Served: RESPONDENTS' OBJECTION TO APPELLANTS' REPLY TO
RESPONDENTS' RETURN IN OPPOSITION TO APPELLANT'S
MOTION TO HOLD OR RECALL REMITTITUR AND TO
REINSTATE APPEAL and TO EXTEND TIME FOR FILING
PROOF OF SERVICE**

Parties Served:

Charles E. Houston, Esquire
The Houston Law Firm, LLC
1000 Main Street, Suite 200C
Hilton Head Island, SC 29926;
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
April 24, 2022