

SMITH, MASSEY, BRODIE, GYNN & MAYES, LLC

ATTORNEYS AND COUNSELORS AT LAW

GARY H. SMITH, III
WM. RAY MASSEY*
BRAD A. BRODIE
MARY O. GYNN**
W. DANIEL MAYES
SCOTT W. PATTERSON

*ALSO LICENSED IN NORTH CAROLINA
**ALSO LICENSED IN GEORGIA

POST OFFICE BOX 519
210 COLONY PARKWAY, SOUTHEAST
AIKEN, SOUTH CAROLINA 29802

TELEPHONE
(803) 643-4110
FACSIMILE
(803) 643-8140
(803) 644-9057

May 19, 2022

COURT OF APPEALS FILINGS CTAPPFILINGS@SCCOURTS.ORG

Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

May 19 2022

SC Court of Appeals

Re: Mark B. Mitchell et. al. vs. Ronald Joseph Albertelli, et. al.
Case No.: 2020-CP-02-01173
Court of Appeals Case No.: 2022-000236

Dear Ms. Kitchings:

I represent Ronald Joseph Albertelli and Mary Frances Snelling, as Trustees of the Mary Frances Snelling Trust, who are both Defendants in the underlying case and now Respondents in the appeal, which is before the Court. Pursuant to S.C. Ct. App. Rule 208(b)6, Respondents Ronald Joseph Albertelli and Mary Frances Snelling, as Trustees of the Mary Frances Snelling Trust (hereinafter "Respondents Albertelli and Snelling") concur with and rely on the filed Initial Brief of Respondents Mitchell and the Designation of Matter to be included in the Record on Appeal filed by Respondents Mitchell in this case. There is no practical reason for Respondents Albertelli and Snelling to file a separate brief as the issues are the same, and Respondents Albertelli and Snelling will not be filing a separate brief.

I have attached a copy of the Initial Brief of Respondents Mitchell and the Designation of Matter to be included in the Record on Appeal filed by Respondents Mitchell in this case for your reference. By copy of this correspondence, I am serving counsel of record with the same. Please let me know if you should require anything else from me at this time.

Best Regards,



Brad A. Brodie

cc: John W. Harte, Esq.
W. Grady Jordan, Esq.

RECEIVED

May 19 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM AIKEN COUNTY
COURT OF COMMON PLEAS

M. Anderson Griffith, Master-in-Equity

Case No. 2020-CP-02-1173

Mark B. Mitchell and Celine C. Mitchell, Plaintiffs,

v.

Ronald Joseph Albertelli and Mary Frances Snelling, Trustees of the Mary Frances Snelling Living Trust, Donnita C. Harmon and Jimmie Phillip Harmon, Defendants,

Of whom, Ronald Joseph Albertelli and Mary Frances Snelling, Trustees of the Mary Frances Snelling Living Trust, Mark B. Mitchell and Celine C. Mitchell are the Respondents,

AND

Donnita C. Harmon and Jimmie Phillip Harmon are the Appellants.

PROOF OF SERVICE

I certify that I have served the letter of Brad A. Brodie, Esq. dated May 19, 2022, along with a copy of the Initial Brief of Respondents Mitchell and Designation of Matter to be included in the Record on Appeal by Respondents Mitchell, which documents were adopted by reference by Respondents' Ronald Joseph Albertelli and Mary Frances Snelling, Trustees of the Mary Frances Snelling Living Trust, Brief and Designation of Matter, on the counsels addressed below, by emailing a PDF of the same, on May 19, 2022, addressed to the counsels of record at the following email addresses:

John W. Harte, Esq.
john@jwhartelaw.com
Law Offices of John W. Harte
P.O. Box 7215
Aiken, SC 29804
Attorney for Appellants

W. Grady Jordan, Esq.
jordan@smithjordan.com
Smith Jordan, P.A.
P.O. Box 1207
Easley, SC 29641
Attorney for Respondents Mitchell

s/Brad A. Brodie

Brad A. Brodie, SC Bar # 8632

Smith, Massey, Brodie, Guynn & Mayes, LLC

Post Office Box 519

Aiken, SC 29802

brodielawfirm@gmail.com

(803) 643-4110

Attorney for Respondents Albertelli and Snelling