

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Maite D. Murphy, Master-In-Equity

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Case No. 2012-213177

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RECEIVED  
APR 29 2013  
SC Court of Appeals

C.S. Carter.....Plaintiff,

v.

D.J. Brown aka Dan Brown aka Dan J. Brown, Eric Brown, Etholia Brown, Enoch Wesley Brown, Jr., Ernest Brown, Jr., Karen Brown, Lisa Brown, Michael Brown, Rena Brown, Michael C. Brown, Sr. aka Michael C. Brown, Clara B. Moses aka Clara Brown Moses, Mable Brown Moses aka Mabel B. Moses, Westbury Ace Hardware, CPM Federal Credit Union, Ford Motor Credit, Sears Roebuck & Company, The St. Paul Campground Association aka St. Paul Campground and JOHN DOE, a fictitious name used herein to designate the unknown heirs at law, distributees, devisees, issue, personal representatives, successors and/or assigns of Dorothy Brown and Ernest Brown aka Ernest D. Brown, D.J. Brown aka Dan Brown aka Dan J. Brown, Eric Brown, Etholia Brown, Enoch Wesley Brown, Jr., Ernest Brown, Jr., Karen Brown, Lisa Brown, Michael Brown, Rena Brown, Michael C. Brown, Sr. aka Michael C. Brown, Clara B. Moses aka Clara Brown Moses, Mable Brown Moses aka Mabel B. Moses, all being deceased persons or who may be deceased persons, and MARY ROE, a fictitious name designating all other persons and legal entities unknown who may have or claim any right, title, estate, interest in or lien upon the real estate described herein, including any such as may be infants, minors, prisoners, incompetents, or under any other disability, including the Service Members' Civil Relief Act.....Defendants.

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AND

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Rena Brown aka Renee Brown aka Renee A. Lawrence, Eric Brown aka Eric W. Brown aka Eric Wesley Brown, Lisa Brown aka Lisa Brown-Hoff, Michael Brown aka Michael E. Brown aka Michael Enoch Brown, Karen Brown aka Karen M. Brown aka Karen Michelle Brown, and Michael C. Brown, Sr. aka Michael C. Brown aka Michael Clay Brown.....Third-Party Plaintiffs,

v.

Dorchester County.....Third-Party Defendant.

OF WHOM

C.S. Carter and Dorchester County.....Respondents  
APR 29 2013  
SC Court of Appeals

v.

Rena Brown aka Renee Brown aka Renee A. Lawrence, Eric Brown aka Eric W. Brown aka Eric Wesley Brown, Lisa Brown aka Lisa Brown-Hoff, Michael Brown aka Michael E. Brown aka Michael Enoch Brown, Karen Brown aka Karen M. Brown aka Karen Michelle Brown, and Michael C. Brown, Sr. aka Michael C. Brown aka Michael Clay Brown.....Appellants.

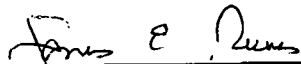
JOINT DESIGNATION OF MATTER  
TO BE INCLUDED ON APPEAL OF RESPONDENTS  
C.S. CARTER AND DORCHESTER COUNTY

Respondents propose the following be included in the Record on Appeal:

1. Civil Coversheet, Summons, and Complaint filed June 11, 2010;
2. Answer, Counterclaim and Third-Party Complaint served August 17, 2010;
3. Answer of Dorchester County filed September 15, 2010;
4. Second Amended Reply of C.S. Carter filed June 7, 2011;
5. Order Confirming Tax Deed filed May 4, 2012 pp.5-6;
6. Order Denying Motion for New Trial or to Alter or Amend filed September 12, 2012;
7. Plaintiff's Exhibit 1 - Tax Deed;
8. Defendant's Exhibit 1- Deed 132 pp. 502;
9. Plaintiff's Exhibit 7 – Plat Book L, pg. 146;
10. Plaintiff's Exhibit 2 – Deed 409, 18;
11. Plaintiff's Exhibit 13 – Deed 406, 10;
12. Transcript of Proceedings pp. 7-13; 30; 33-36; 52-54; 73-74; 80-85; 88-90; 94-95; and 98-104;
13. Defendant's Exhibit 3 – Devise and Descent Form.

I certify this 26th day of April, 2013, that this designation contains no matter which is irrelevant to this appeal.

**JAMES E. REEVES, P.A.**

BY:   
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**ATTORNEY FOR RESPONDENT  
C.S. CARTER**

Dated: 4/26, 2013  
Summerville, South Carolina

**CHELLIS & FRAMPTON, P.A.**

BY:   
\_\_\_\_\_  
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**ATTORNEY FOR RESPONDENT  
DORCHESTER COUNTY**

Dated: 4/26, 2013  
Summerville, South Carolina

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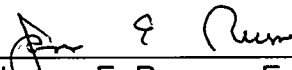
C.S. Carter and Dorchester County.....Respondents.

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PROOF OF SERVICE

I certify that I have served the Joint Initial Brief of Respondents C.S. Carter and Dorchester County and Designation of Matter to be Included on Appeal of C.S. Carter and Dorchester County on the Appellants by depositing a copy of it in the United States Mail, postage prepaid, on April 26, 2013, addressed to their attorney of record, Evert Comer, Jr., Esquire, P.O. Box 386, Denmark, South Carolina 29042 and the Respondent, Dorchester County by depositing a copy of it in the United States Mail, postage prepaid, on April 26, 2013, addressed to their attorney of record, John G. Frampton, Esquire, 112 West 4th North Street, Summerville, South Carolina 29042.

  
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ATTORNEY FOR RESPONDENT  
C.S. CARTER

Dated: April 26, 2013  
Summerville, South Carolina

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