

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF CHARLESTON ) NINTH JUDICIAL CIRCUIT

**FLORENCE MIDDLETON and** )  
**OSCAR RIVERS,** ) CASE NO.: 2019-CP-10- 5803

Plaintiffs, )

v. )

**AMENDED LIS PENDENS**

**FRANK T. WARING (deceased), TREVOR WARING, )**  
**ROBIN WARING, SONYA WARING, KEISHA T. )**  
**WARING, KAREN WARING MASIONET DARRYL )**  
**J. GREEN, DAVID AHMAD f/k/a DAVID GREEN, )**  
**JR., ELIZABETH REDDEN, JACQUELINE CARTER )**  
**a/k/a ALMA J. CARTER, MACKIE T. GREEN, )**  
**MARSHALL A. GREEN, PAMELA L. GREEN, )**  
**VERA A. SHEPARD, WANDELL GREEN, FRANCES )**  
**RIVERS, PATRICIA BRYANT, WILLIS BURTON, )**  
**LEROY BURTON, JOHN DOE and JANE DOE, )**  
fictitious names used to designate the unknown heirs at )  
law, devisees, legatees, distributees, issue, executors, )  
administrators, successors or assigns of the above-named )  
Defendants, if they or any of them be dead, and any and all )  
persons claiming by, through or under them, or having or )  
claiming to have any right, title, interest in, estate or lien )  
upon the premises described in the Complaint and **MARY )**  
**ROE and RICHARD ROE**, fictitious names used to )  
designate the unknown infants, heirs, devisees, legatees, )  
distributees, alienees, wife, wives, successors or persons )  
who are minors, insane, incompetent or under any and all )  
other disabilities known and unknown, )

Defendants. )

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NOTICE IS HEREBY GIVEN that an action has been or is to be commenced in the Court of Common Pleas for Charleston County, South Carolina, by the above named Plaintiffs bring this action pursuant to SCRCF Rule 71 for a partition of the property to be more fully described hereinafter and pursuant to the provisions of the 1976 South Carolina Code of Laws, as amended, Section 15-53-10, et. seq., (known as the Uniform Declaratory Judgment Act), and for the further

purpose of seeking an order from the Court that the Plaintiffs and the Defendants hereinafter named are the true and lawful owners of the subject property more fully described hereinafter and for the Court to determine their respective percentages of ownership; this action is further brought for the purpose of obtaining an Order from this Court partitioning the subject property; this action is further brought for the purpose of this Court establishing and making a determination of the heirs of FRANK WARING, deceased; this action is further brought for the purpose of this Court ordering that the property cannot be partitioned in kind and thus ordering the sale of the subject property by private sale. The Plaintiffs will further seek an order from this Court declaring that none of the remaining Defendants, their heirs, successors, and assigns, have any right, title, or interest in the subject Property save for that which is determined by this Court.

That the property, which is the subject matter of this action, at the time of this Notice, is described as follows:

**ALL** that lot, piece or parcel of land, with the buildings thereon, situate, lying and being in the County of Charleston, State of South Carolina, in the subdivision of the said County known as "ROSEMONT", or DISCHER FARM, more specifically delineated on a plat of the said "ROSEMONT" drawn by McCrady Brothers and Cheves, Inc. June 1914, and recorded in the R.M.C. Office for Charleston County, in Plat Book "C", page 78, the said lot being designated on the said plat as Lot 16 in Block "B". Measuring and containing in front forty (40') feet on the East on Dorchester Avenue, by the same measurement on the back or West line, and in depth on the North line One Hundred (100') feet, and on the South line One Hundred (100') feet.

**BUTTING** and bounding East on Dorchester Avenue, as laid out on said Plat; West on Lot No. 10 in Block "B" on said Plat; North on Lot No. 15 in Block "B" on said Plat, and South on Doscher Avenue on said Plat.

**BEING** the same premises conveyed by deed of the A. H. Fischer Company, to Thomas E. Williams and Florence R. Williams, dated May 10, 1944, and recorded May 23, 1944 in the R.M.C. Office for Charleston County in Book F-44, page 327.

TMS # 464-01-00-089

Address: 1901 Doscher Avenue, Charleston, SC 29405

**COBB DILL & HAMMETT, LLC**

**/s/ Bryan A. Raymond**

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ATTORNEY FOR THE PLAINTIFFS

Mount Pleasant, South Carolina  
December 9, 2019