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PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- The payment figures come from payment_records.pdf, which includes a summary prepared by the client. Confirm each item against the underlying receipts. Curtis's utilities and lawn care amounts were not provided, so the table has a placeholder.
- The total paid by Lorraine ($8,696.36) is the sum of four amounts as read from the records. It matches the client's own total. Please re-add it.
- The first insurance premium ($1,236.00) was paid February 20, 2025, for a policy starting March 1, 2025. Both dates fall before the September 12, 2025 deed, while the estate held title. Confirm that Lorraine should be credited for it.
- The deed and appraisal summaries refer to internal pages (deed "Page 2"; appraiser's comments "page 3" and "page 4"), but each file is one page. I cited all of them as p.1. Check the full documents.
- The notes do not say whether to assert a rent or occupancy claim against Curtis, or to seek reimbursement of the $525.00 appraisal fee. The letter notes the appraiser's rental-value statement and leaves both as placeholders.
- Curtis said he might "pay something over time." The notes do not say whether the client will consider installment terms. Confirm and fill in the placeholder.
- The demand amount, response deadline, date, delivery method, recipients' addresses and any counsel for the recipients are not in the sources.
- Three South Carolina points are marked [VERIFY]: partition procedure (in kind or by sale, any buyout right), accounting and credits between co-owners, and the rules on partition of heirs property. Confirm that the property qualifies as heirs property.
- Decide whether to keep the short quotations from the siblings' messages.

Pinckney Marlowe LLC
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

Curtis Whitfield
[ADD: street address]

[ADD: city, state ZIP]

Monique Whitfield Reyes
[ADD: street address]
[ADD: city, state ZIP]

Re: Proposal for Buyout or Voluntary Sale of 2741 Pecan Grove Road, Marlow Crossing, South Carolina; Our Client: Lorraine Whitfield Banks; Estate of Edna Mae Whitfield, Estate No. 2025-ES-0118 [deed_of_distribution.pdf p.1]

Dear Mr. Whitfield and Ms. Reyes:

Introduction

We represent your sister, Lorraine Whitfield Banks [firm notes], a co-owner of 2741 Pecan Grove Road, Marlow Crossing, South Carolina (the "Property"). We write on her behalf about the future of the Property. Our hope is that the three of you can settle this together, as your mother hoped, without a court case. If either of you is represented by counsel, please give this letter to your attorney.

Ownership

By Deed of Distribution dated September 12, 2025, and recorded September 19, 2025, in the Lanier County Register of Deeds, Book 1906, Page 77, Curtis Whitfield, as Personal Representative of the Estate of Edna Mae Whitfield, conveyed the Property to Lorraine Whitfield Banks, Curtis Whitfield and Monique Whitfield Reyes "as tenants in common, each an undivided one-third (1/3) interest, as provided in the Last Will and Testament of Edna Mae Whitfield" [deed_of_distribution.pdf p.1]. The Property is the 4.6 acre tract with farmhouse shown on the plat recorded in Plat Book 39, Page 12 [deed_of_distribution.pdf p.1]. Mrs. Whitfield died January 8, 2025 [deed_of_distribution.pdf p.1].

Article III of her will states: "I leave my home on Pecan Grove Road to my three children in equal shares. I hope they will decide together what is best for it." [deed_of_distribution.pdf p.1]. The records show no mortgage of record. They also show no agreement among the three of you about use, sale or buyout of the Property, and no co-ownership agreement has been signed [deed_of_distribution.pdf p.1].

Background

Curtis has lived in the Property since February 2025, and the electric account has been in his name since that month [payment_records.pdf p.1]. According to our client, he has not paid rent to the other owners [payment_records.pdf p.1]. Lorraine has paid the property taxes, the homeowners insurance and the roof repair described below [payment_records.pdf p.1]. According to our client's summary, Monique has reported no payments [payment_records.pdf p.1]. Curtis has paid utilities and lawn care [payment_records.pdf p.1].

The co-owners have discussed the Property as follows:

- March 3, 2026: Lorraine wrote to both of you that she could not keep paying for a house she does not use, and asked that the Property be sold or that one of you buy her share [family_correspondence.pdf p.1].
- March 5, 2026: Monique replied that she was fine with selling but did not have money to buy anyone out [family_correspondence.pdf p.1].
- March 9, 2026: Curtis replied that their mother wanted the family to keep the Property and that he was not moving out [family_correspondence.pdf p.1].
- June 2, 2026: Lorraine wrote that she had paid for the roof repair and was obtaining an appraisal, and asked Curtis whether he would consider buying her third [family_correspondence.pdf p.1].
- September 1, 2026: Lorraine sent the appraisal and said she was open to a fair buyout, or to listing the Property with a local agent and splitting the proceeds after the expenses were settled [family_correspondence.pdf p.1].
- September 14, 2026: Curtis wrote that he could not get a loan for that amount and that perhaps he could pay something over time [family_correspondence.pdf p.1].

We understand there has been no further proposal from Curtis as of November 10, 2026 [family_correspondence.pdf p.1].

Contributions

The records show the following payments by Lorraine for the Property:

Item	Paid by	Period	Amount	Source
2025 property tax, Lanier County Treasurer	Lorraine Whitfield Banks	2025 tax year; paid January 6, 2026	$1,412.36	[payment_records.pdf p.1]
Homeowners insurance, Palmetto Shield Insurance Co.	Lorraine Whitfield Banks	March 1, 2025 to March 1, 2026; paid February 20, 2025	$1,236.00	[payment_records.pdf p.1]
Homeowners insurance, Palmetto Shield Insurance Co.	Lorraine Whitfield Banks	March 1, 2026 to March 1, 2027; paid February 17, 2026	$1,298.00	[payment_records.pdf p.1]
Roof repair (storm-damaged rear section and flashing), Lowcountry Roofing and Gutter, Invoice 3307	Lorraine Whitfield Banks	Invoiced May 21, 2026; paid May 22, 2026	$4,750.00	[payment_records.pdf p.1]
Total paid by Lorraine (as read from the records)			**$8,696.36**	[payment_records.pdf p.1]
Utilities and lawn care	Curtis Whitfield	Since February 2025 (utilities)	[ADD: amount]	[payment_records.pdf p.1]

We have not seen payments by Monique [payment_records.pdf p.1]. The 2026 property tax bill of $1,468.10, issued October 15, 2026, is due January 15, 2027, and has not been paid [payment_records.pdf p.1]. [ADD: proposal for payment of the 2026 tax bill]

Our client's position is that any sale should be preceded by an accounting, with credit to her for what she has paid, and we ask that Curtis provide his payment records for review. [VERIFY: South Carolina rule on accounting and credits between co-owners] [ADD: whether the client asserts a claim for rent or occupancy credit, and any reimbursement of the $525.00 appraisal fee]

Value

Gwendolyn Baptiste, a Certified Residential Appraiser with Sea Island Valuation Group, gave an opinion of market value, as is, of $186,000.00 as of August 26, 2026 [appraisal_summary.pdf p.1]. Curtis gave access for the interior and exterior inspection [appraisal_summary.pdf p.1]. The appraiser based her opinion on three rural home sales in Lanier County from January 2026 to July 2026, with an adjusted range of $171,000 to $197,500 [appraisal_summary.pdf p.1]. She described the Property as in average condition for its age. She noted that the kitchen and bath would likely need updating for a typical buyer, and that marketing time in this rural area is typically longer than in town [appraisal_summary.pdf p.1]. She also reported a market rent for the house of $1,150.00 per month [appraisal_summary.pdf p.1]. Lorraine paid the appraisal fee of $525.00 [appraisal_summary.pdf p.1].

Proposal and demand

Our client would prefer that the Property stay in the family. She proposes two options:

- **Option 1, buyout.** Curtis purchases Lorraine's undivided one-third interest for [ADD: demand amount] [firm notes]. Because Curtis has said he may need to pay over time, we are willing to discuss terms. [ADD: whether the client will consider installment or other payment terms]
- **Option 2, voluntary sale.** The three owners list the Property for sale with a local agent. After an accounting, the net proceeds are divided by share, with credit to Lorraine for the amounts she has paid [firm notes].

Please let us know by [ADD: response deadline] which option you prefer, or whether you would like to discuss another arrangement. If we cannot reach an agreement, Lorraine intends to file an action for partition of the Property [firm notes]. [VERIFY: South Carolina partition procedure, including partition in kind or by sale and any buyout right] [VERIFY: South Carolina rules on partition of heirs property] Lorraine reserves all of her rights and remedies, including her rights to an accounting and to credits for her payments.

We would welcome a call or meeting with either or both of you, or with your attorney. Please contact me at [ADD: phone] or [ADD: email].

Sincerely,

Charles W. Pinckney
Pinckney Marlowe LLC