

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
(In the Supreme Court)
Case No. 2021-001504

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Sep 01 2022
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Letitia H. Verdin, SC Judge 2162
Case No.2021-CP-23-0362

JAYNE LaFORGE STOVALL, APPELLANT

V.

PAULETTE B. STOVALL and
WILLIAM S. STOVALL, DEFENDANTS
Of WHOM PAULETE B. STOVALL IS THE RESPONDENT

MOTION TO QUASH RESPONDENT'S MOTION TO DISMISS
OR IN THE ALTERNATIVE TO STRIKE APPELLANT'S INITIAL BRIEF

Jayne LaForge Stovall
3197 Golden Oak Ct.
Dallas, Texas 75234
972-983-4712

MOTION TO QUASH RESPONDENT'S MOTION TO DISMISS OR
IN THE ALTERNATIVE TO STRIKE APPELLANT'S INITIAL BRIEF

Appellate Case No. 2021 - 001504

Comes now Appellant Jayne LaForge Stovall and respectfully moves this Court to quash Respondent's Motion to Dismiss or in the alternative to Strike Appellant's Initial Brief for the following reasons:

1. Discrepancies cited by the Court Clerk on the Initial Brief were in the format, not the content, and subsequently corrected.
2. There were no court reporters present at any of the Zoom hearings and Zoom hearing tapes cannot be transcribed and transcriptions of them used as evidence, Respondent cannot refer to said transcription which has been substantially redacted either by whoever did the transcript and provided it to Respondent's attorney, or redacted by Respondent's attorney, for the hearing held in Greenville Probate Court by Judge Jennings on May 19th 2021. No Order was written for this hearing. The court can obtain and listen to Zoom hearing tapes, to confirm. Witnesses present at this hearing also provided depositions and affidavits prior to and following the hearing in timely fashion.
3. All evidence material has been provided to the Greenville courts and to the Court of Appeals, as well as to Respondent's attorneys in timely and proper form. Appellant has copies of receipts confirming transmission.
4. Respondent's immediate response to Appellant's Initial Brief should be ordered by this court.

Respectfully submitted ,

Jayne G. Stovall

Jayne LaForge Stovall, Appellant

CERTIFICATE OF SERVICE

I, Jayne LaForge Stovall, certify that on this date, September 1, 2022, a copy of Appellant's Motion To Quash Respondent's Motion To Dismiss Or In The Alternative Strike Appellant's Initial Brief was served on Paulette B. Stovall, Respondent, via her attorney, Devon M. Puriefoy and William Stovall, Defendant, via U. S. Postal Service mail, as follows:

Devon M. Puriefoy, Attorney
3 Boyce Avenue
Greenville, S. Carolina, 29601

William S. Stovall
1305 North King James Lane
Liberty Lake, Washington 99019

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FAX



To: Latoyla Burns

Fax: 1-803-734-1839

Date: 09/01/22

Re: motion

From: Jayne Stovall

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