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**Jan 11 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

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Case No. 2019-CP-3901224  
Appellate Case No. 2022-001777

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Christopher Young and Biotech Restorations, LLC

Appellants,

v.

Joanna Marie Paynter, a/k/a Joey Painter, Samantha P. Nelson, and Paynter Consulting, LLC,

Respondents.

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**NOTICE OF CROSS-APPEAL**

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Respondents Joanna Marie Paynter, a/k/a Joey Painter, and Samantha P. Nelson

(Respondents/Cross-Appellants) respectfully appeal the following orders and decisions of the Honorable Letitia H. Verdin:

1. the denial of Respondents/Cross-Appellants' motion for a directed verdict based on *res judicata*;
2. the denial of Respondents/Cross-Appellants' motion for a directed verdict based on the statute of limitations; and
3. the decision to admit into evidence over Respondents/Cross-Appellants' objection the General Partnership Agreement shown in Plaintiffs' Exhibit 3.

Respondents/Cross-Appellants received notice of the final Judgment that forms the basis of this Cross-Appeal on December 13, 2022.

Respectfully submitted,

s/Steven R. LeBlanc

Steven R. LeBlanc (SC Bar 14221)

Steve LeBlanc, LLC

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***Attorneys for Respondents/Cross-Appellants***

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**PROOF OF SERVICE**

I certify that on January 11, 2023, I filed a **Notice of Cross-Appeal** with the Pickens County Court of Common Pleas and the South Carolina Court of Appeals and served a copy on all counsel of record by email as demonstrated by the attached email.

Respectfully submitted,

s/Steven R. LeBlanc  
Steven R. LeBlanc (SC Bar 14221)  
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Steve@LeBlancLLC.com

*Attorneys for Respondents/Cross-Appellants*

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SC Court of Appeals

**From:** [Steven LeBlanc](#)  
**To:** [Wesley Few \(wes@wesleyfew.com\)](mailto:wes@wesleyfew.com)  
**Cc:** [Kim Parker](#); [Cassy G. Young](#)  
**Subject:** Notice of Cross-Appeal  
**Date:** Wednesday, January 11, 2023 2:48:00 PM  
**Attachments:** [image001.png](#)  
[1-11-23 Notice of Cross-Appeal.pdf](#)

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*Young v. Paynter*

**Appellate Case Number: 2022-001777**

Good Afternoon,

Attached please find a Notice of Cross-Appeal being served on you as counsel for Appellants. The attached document will be electronically filed with Pickens County Court of Common Pleas and the Court of Appeals today.

Thank you.

Steve

