



Steve LeBlanc, LLC

January 13, 2023

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Jan 13 2023

SC Court of Appeals

Via Email – ctappfilings@sccourts.org
Via U.S. Mail

The Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Christopher Young and Biotech Restorations, LLC v. Joanna Marie Paynter, a/k/a
Joey Painter, Samantha P. Nelson, and Paynter Consulting, LLC
Case No. 2019-CP-3901224
Appellate Case No. 2022-001777

Dear Ms. Kitchings,

Please allow this letter to address the following deficiencies in Respondents/Appellants' Notice of Cross-Appeal described in your letter dated January 13, 2023.

The notice of appeal is not accompanied by the order(s) and/or judgment(s) challenged on appeal.

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* – During trial on April 20, 2022, the Honorable Letitia H. Verdin denied Respondents/Appellants' oral motion for directed verdict based on *res judicata*. Trial Tr., p. 243.
2. the denial of Respondents/Cross-Appellants' motion for a directed verdict based on the statute of limitations – During trial on April 20, 2022, the Honorable Letitia H. Verdin denied Respondents/Appellants' oral motion for directed verdict based on the statute of limitations. Trial Tr., p. 243.
3. the decision to admit into evidence over Respondents/Cross-Appellants' objection the General Partnership Agreement shown in Plaintiffs' Exhibit 3 - During trial on April 20, 2022, the Honorable Letitia H. Verdin overruled Respondents/Appellants' objection to the admissibility of Plaintiffs' Exhibit 3. Trial Tr., p. 93. By Order filed November 17, 2022, the Honorable Letitia H. Verdin denied Respondents/Appellants' motion to reconsider the decision to admit Plaintiffs' Exhibit 3.

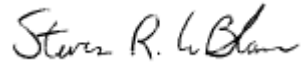
The undersigned spoke with the clerk's office on January 13, 2023, and were advised that it was not necessary to include with this letter a copy of the Trial Transcript or Order filed November 17, 2022.

The required filing fee has not been submitted.

Respondents/Appellants include with this letter a check for \$250.00 for the filing fee.

Thank you for your assistance in this matter.

Sincerely,



Steven R. LeBlanc

SRL/kp