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Apr 17 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Supreme Court

AMENDED BRIEF OF APPELLANT TONJI L. MEREDITH

THE STATE OF SOUTH CAROLINA

County of Spartanburg

Appeal from Tonji L. Meredith of South Carolina

APPEAL FROM SPARTANBURG COUNTY

COMMON PLEAS

Appellate Case No. 2021-001076

In Re: Appealing my case from Lower Court of Spartanburg County Clerk of Court

180 Magnolia Street 2nd floor suite 500

TONJI L. MEREDITH

2370 BROCKMAN MCCLIMON RD.

GREER, SC 29651

PHONE: 864-894-9160

TONJIMEREDITH1969@GMAIL.COM

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STATEMENT OF ISSUES

- 1. The DEEDS of Luther Leon Meredith That Listed to his HEIRS, were never accepted by Spartanburg Municipal Court, In The Court of Common Pleas of the Seventh Judicial Circuit Court.**
- 2. The LAST WILL AND TESTAMENT Dated May 07, 2003 was not accepted by PROBATE COURT, SPARTANBURG MUNICIPAL COMMON PLEAS OF THE SEVENTH JUDICIAL CIRCUIT COURT.**
- 3. Validity of the Notary on the LAST WILL AND TESTAMENT BY THE SOUTH CAROLINA SECRETARY OF STATE.**

Statement of the Case

1. Probate Court

August 26, 2019

Case # 2017 ES 4201163

Judge David Anderson Associate Probate Judge

Nature of Matter: Contested Last Will and Testament

Action of Court: Found no reason to overturn the Admittance of 1996 LAST WILL and TESTAMENT.

2. Common Pleas Court

January 10, 2020

Case# 2019 CP 4200891

Judge Mark Hayes

Nature of Matter: Appeal Probate Court Action

Action of the Court: No decision was made due to no records available from Probate Court

3. Common Pleas Court

May 13, 2020

Case# 2019-CP-42-04222

Nature of Matter: Appeal Probate Court Decision

Action of Court: dismissed appeal

ARGUMENTS

1. Deed search was order by Probate Judge David Anderson and never was executed or submitted to Probate Court or Common Pleas Court.
2. I, Tonji L. Meredith found a later dated Last WILL and Testament of Luther Leon Meredith dated May 07, 2003. I took the Last Will and Testament to Spartanburg County Municipal Court, Probate Court Office to have it recorded. I presented the document to Spartanburg County clerk of court, Erin Hall and her Supervisor refused to accept the document from me.
3. The Lower courts made decisions without seeing letters stating validity of Notary on LAST WILL AND TESTAMENT dated February 25, 2019

Conclusion

For the reasons that this information was never admissible in court, the motion to appeal should be respectfully granted and all information be accepted before any court rulings.

Respectfully submitted,

Date: April 17, 2023

Signed: Tonji L. Meredith

Tonji L. Meredith

2370 Brockman McClimon Rd.

Greer, SC 29651

Phone: 864-894-9160

Tonjimeredith1969@gmail.com

Tonji L. Meredith
2370 Brockman McClimon Rd.
Greer, South Carolina 29651

These are the list of my father Luther Leon
Meredith DEEDS of his land.

DEED 77-YPG83b
DEED 70 H PG 311
DEED b5-N-PG-754
DEED 51C PAGE697
DEED 9b-T PG b 40
DEED 51C PAGE 0705
DEED 51C PAGE 0717
DEED 51 C PAGE 0685
DEED 96-TPG640
DEED 53 N PG 025
DEED 63 W PG 209

LAST WILL AND TESTAMENT
OF
LUTHER LEON MEREDITH

I, **LUTHER LEON MEREDITH** of Spartanburg County, State of South Carolina, being of sound and disposing mind and memory, do hereby make, publish and declarer this to be my **LAST WILL AND TESTAMENT**, hereby revoking any and all former Wills and Codicils heretofore made by me.

I direct my Personal Representative or Substitute Personal Representative, **TONJI LAVONNE MEREDITH AND EVELYN EVANS MEREDITH** named, to pay all of my just debt including the expenses of my last illness and funeral expenses, as soon after my death as practicable.

I hereby will, devise and bequeath unto my beloved Children, **BARRY GLENN, TAMMY GLENN, and SCOTTIE GLENN**, absolutely nothing under this my Last Will and Testament.

I hereby will, devise and bequeath all of my real and personal property of every kind and description, wheresoever situate and whether acquired before or after the execution of this Will to **TONJI LAVONNE MEREDITH, her HEIRS AND ASSIGNS FOREVER**, to my youngest daughter be hers in fee simple my real at 2370 Brockman McClimon Rd. Greer, Spartanburg County, South Carolina 29651, 2212 Brockman McClimon Rd. Greer, Spartanburg County, South Carolina 29651, and my rental property at 18 Lindsay Ave Greenville, Greenville County, South Carolina 29607. Tonji is to share and share alike to **SONJI LASHONNE MEREDITH, FREDERICK LAMOUNT MEREDITH, and MARCUS LEON MEREDITH**.

I hereby nominate, constitute and appoint as Personal Representative of this my Last Will and Testament, **TONJI LAVONNE MEREDITH**, and the direct as she shall serve without bond. If for any reason she is unable or unwilling to serve, I then nominate, constitute and appoint as Substitute Personal Representative, **EVELYN EVANS MEREDITH**, the mother of my four children that we union together and direct that she, shall serve without bond.

I hereby give my Personal Representative or Substitute Personal Representative, full power and authority in all matters and questions, including, but not limited to, complete power to sell at public or private sale, for cash or credit, with or with security, and no mortgage, real and personal, as such times and upon such terms and conditions as said Personal Representative or Substitute Personal Representative may deem necessary, and to exercise all such powers without obtaining approval of any Court.

If any beneficiary and I should die under such circumstances as would render it doubtful whether the beneficiary or I died first, then it shall be conclusively presumed for the purpose of this my **LAST WILL AND TESTAMENT**, that said beneficiary predeceased me.

I, **LUTHER LEON MEREDITH**, the Testator, sign my name to this instrument, this 7th day of May, 2003, and being first duly sworn, do hereby declare to the undersigned authority, that I sign and execute this instrument as my **LAST WILL** and I sign it willingly, that I execute it as my free and voluntary act for the purposes therein expressed, and that I am eighteen years of age or older, of sound mind, and under no constraint or under influence.

LUTHER LEON MEREDITH

SIGNATURE:

Luther Leon Meredith
LUTHER LEON MEREDITH

WITNESS: # 1

BOBBY JOE HENDERSON

SIGNATURE:

Bobby Joe Henderson

INITIALS:

BJH

WITNESS: # 2

INEZ EVANS

SIGNATURE:

Inez Evans

INITIALS:

IE 5-7-2003



Cherokee County Clerk of Court Office

BRANDY W. MCBEE
CLERK OF COURT

POST OFFICE DRAWER 2289
125 E. FLOYD BAKER BLVD
GAFFNEY, SC 29342
PHONE: (864) 487-2571
FAX: (864) 487-2754

November 25, 2019

To Whom It May Concern:

Please be advised that the notary records have been searched from 1969 to current and we do not see that a notary signature in the name of Debra Osborne or Debra McCartney has ever been registered.

Please contact my office should you need further information.

Sincerely,

A handwritten signature in black ink that reads "Brandy W. McBee". The signature is written in a cursive style with a large initial "B".

Brandy W. McBee
Clerk of Court

State of South Carolina
Office of the Secretary of State
The Honorable Mark Hammond

1205 PENDLETON STREET, SUITE 525
COLUMBIA, SC 29201

803-734-2170
www.sos.sc.gov



February 25, 2019

VIA HAND DELIVERY

Tonji L. Meredith

Dear Ms. Meredith:

After a review of our records, we cannot verify that there was a commissioned notary public by the name of Debra H. McCartney or Delisa H. McCartney with term expiring 9/27/1999.

Sincerely,

A handwritten signature in cursive script that reads "Meredith Augustine".

Meredith Augustine
Deputy General Counsel
Office of the Secretary of State

Sworn and Subscribed before me

On this 25th day of February, 2019

Sara Damaske
Notary Public for South Carolina
Commission Expires: 1-4-2029



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SC Court of Appeals

**FORM 13
PROOF OF SERVICE OF A NOTICE OF APPEAL BRIEF**

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]**

**APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas**

CIRCUIT COURT

JUDGE, J DERHAM COLE

Case No. 2019-CP-42-04222

**TONJI LAVONNE MEREDITH,
2370 BROCKMAN MCCLIMON
ROAD, GREER, SC 29651
1 (864) 894-9160
tonjimeredith1969@g
mail.com**

APPELLANT

V.

**TAMMY LEE GLENN &
SCOTTIE S. GLENN
216 SHELL DRIVE
WOODRUFF, SC 29388**

RESPONDENT

**GARY L. COMPTON
296 S. DANIEL MORGAN AVE
SPARTANBURG, SC 29306
gary@garylcompton.c
om**

PRORF OF SERVICE

**I CERTIFY THAT I TONJI LAVONNE MEREDITH HAVE SERVED THE
NOTICE OF COPY BRIEF FOR LUTHER LEON MEREDITH ESTATE ON THURSDAY
APRIL 13, 2023, [DELIVERING A COPY IN POSTAL MAI}**