

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

OCT 10 2023

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Circuit Court

Maite Murphy, Circuit Court Judge

Case No.: 2022-CP-40-05570

Appellate Case No.: 2023-001423

Alisha Baity, Aaron Baity, and Ambrose Nolan Baity.....Appellants,

v.

Geraldine Vanessa Myers-Moore.....Respondent.

APPELLANT'S DESIGNATION OF MATTER

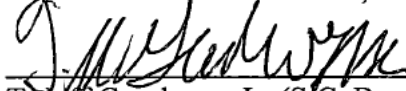
Appellant proposes the following to be included in the Record on Appeal.

1. Order from Circuit Court affirming Probate Court's decision dated September 1, 2023.
2. Order denying Motion to Reconsider dated October 14, 2022.
3. Order dismissing case dated September 26, 2022.
4. Order dismissing original case dated October 27, 2021.
5. Appellant's Motion to Reconsider dated October 5, 2022.
6. Appellant's Notice of Appeal dated October 24, 2022.
7. Appellant's Memorandum in Response to Motion to Dismiss dated August 17, 2022.
8. Respondent's Motion to Dismiss dated and filed March 2, 2022

9. Petitioner's Summons and Complaint dated January 21, 2022 served on Defendant with cover letter dated January 24, 2022.
10. Petitioner's filed Petition to Challenge Validity of Will and For Appointment dated January 28, 2022.
11. Proof of delivery for all filings.
12. Motion for service by publication including affidavit of due diligence and attachments.
13. Proof of publication affidavits.
14. Affidavit of Service on Vanessa Myers-Moore dated January 31, 2022.
15. Affidavits of service on other parties to case with cover letter to Probate Court dated March 18, 2022.
16. Transcript of hearing on August 17, 2022.
17. Transcript of hearing on June 30, 2023
18. Any portion of the Probate Court file.
19. Notice of Appeal to Circuit Court.
20. Appellant's Final Brief to Circuit Court.
21. Respondent's Final to Circuit Court.
22. Appellant's Final Reply Brief to Circuit Court.

Pursuant to Rule 209(c), SCACR, I certify that this Designation contains no matter which is irrelevant to the appeal.

**GOODWYN LAW FIRM, LLC**



---

T. Jeff Goodwyn, Jr. (S.C. Bar No: 73789)

2309 Devine Street

Columbia, SC 29205

(803) 251-4517

[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)

*Attorney for Appellants*

Columbia, South Carolina  
October 9, 2023

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

OCT 10 2023

APPEAL FROM RICHLAND COUNTY SC Court of Appeals  
Circuit Court

Maite Murphy, Circuit Court Judge

Case No.: 2022-CP-40-05570  
Appellate Case No.: 2023-001423

Alisha Baity, Aaron Baity, and Ambrose Nolan Baity.....Appellants,

v.

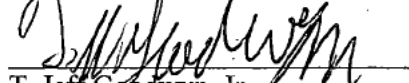
Geraldine Vanessa Myers-Moore.....Respondent.

**PROOF OF SERVICE**

I certify that I have served the **Initial Brief** and **Designation of Matter** on the following parties' and/or parties' counsel, at the addresses listed below by depositing a copy of same in the United States Mail, postage prepaid, on October 9, 2023.

Joyce Farr Cheeks, Esquire Law Office of Joyce Farr Cheeks, PC PO Box 881 Columbia, South Carolina 29202	Geraldine Vanessa Myers-Moore 116 Gordon Drive Columbia, SC 29223
---	---

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.  
Goodwyn Law Firm, LLC  
2309 Devine Street  
Columbia, South Carolina 29205

October 9, 2023

T. Jeff Goodwyn, Jr.\*†  
Charles G. Blackburn\*\*  
Jefferson D. Turnipseed\*\*

# GOODWYN LAW FIRM, LLC

2309 Devine Street  
Columbia, South Carolina 29205

Tel. (803) 251-4517  
Fax (803) 251-4527

Email: JGoodwyn@Goodwynlaw.com  
CBlackburn@Goodwynlaw.com  
JTurnipseed@Goodwynlaw.com  
Web: www.GoodwynLaw.com

\*Also Licensed in Georgia  
† Certified Circuit Court Mediator  
\*\* Of Counsel

October 9, 2023

RECEIVED

OCT 10 2023

SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RE: *Alisha Baity, Aaron Baity, and Ambrose Nolan Baity v. Geraldine Vanessa  
Myers-Moore*  
Case No.: 2022-CP-40-05570  
Appellate Case No.: 2023-001423  
Our File No.: 3000-0626

Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of the **Initial Brief** and **Designation of Matter**, along with a Proof of Service, for filing in regards to the above referenced matter. Please have your office file the original and return a stamped copy to my office in the self-addressed stamped envelope provided.

As evidenced in the Proof of Service, I have served all interested parties and/or parties' counsel, with a copy of same.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures

cc: Joyce F. Cheeks, Esquire  
Geraldine V. Myers-Moore