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Nov 02 2023
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

Hon. Donald B. Hocker, Eighth Judicial Circuit

Case No. 2021-CP-36-00117
Appellate Case No. 2023-001654

Beverly Flemon, as Mother and Guardian of J.F., a minor under
fourteen (14) years of age.Appellant,

v.

Skye Knight-HalmanRespondent.

**MOTION TO DISMISS, OR, IN THE ALTERNATIVE, TO REMOVE SKYE KNIGHT-
HALMAN AS A RESPONDENT**

Skye Knight-Halman files this motion to dismiss or to remove her as a respondent on the grounds that Appellant’s claims against her have been settled and dismissed. In addition, there is not an appealable order underlying Appellant’s notice of appeal.

For ease of reference, a copy of the Public Index is attached as Exhibit A. By order dated June 2, 2023 and attached as Exhibit B, Judge Donald B. Hocker approved a minor settlement in the amount of \$100,000 fully resolving this matter as to Knight-Halman. As part of that approval, Judge Hocker ordered Appellant to provide a monthly accounting of each disbursement for the minor child.

It appears Appellant may have failed to do so. On his own motion, Judge Hocker issued a rule to show cause on October 4, 2023, which is attached as Exhibit C. That is the date referenced

in Appellant's notice of appeal, attached as Exhibit D, and there are no other entries on that date. The rule to show cause simply ordered Appellant to appear on October 25 to show cause why she should not be held in contempt.

In any event, there are no pending claims against Knight-Halman. As such, Knight-Halman is not the adverse party as contemplated by Rule 202(a), SCACR or S.C. Code Ann. § 18-1-120 and is therefore not a proper respondent.

In addition, the notice of appeal does not relate to an appealable order. "The right of appeal arises from and is controlled by statutory law." *N.C. Fed. Sav. & Loan Ass'n v. Twin States Dev. Corp.*, 289 S.C. 480, 481, 347 S.E.2d 97, 97 (1986). Appealability is generally governed by S.C. Code Ann. § 14-3-330, and interlocutory orders are otherwise not immediately appealable. *See, e.g., Flagstar Corp. v. Royal Surplus Lines*, 341 S.C. 68, 533 S.E.2d 331 (2000); *Senter v. Piggly Wiggly Carolina Co.*, 341 S.C. 74, 533 S.E.2d 575 (2000); *Breland v. Love Chevrolet Olds, Inc.*, 339 S.C. 89, 529 S.E.2d 11 (2000). "Any judgment or decree, leaving some further act to be done by the court before the rights of the parties are determined, is interlocutory and not final." *Ex parte Wilson*, 367 S.C. 7, 12, 625 S.E.2d 205, 208 (2005). Here, the order is not appealable under any of the categories provided in S.C. Code Ann. § 14-3-330 because it does not decide any issue. Instead, it merely directs the Appellant to appear.

For these reasons, this appeal should be dismissed. Should the Court disagree, Knight-Halman should be removed as a party to the appeal.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Sarah P. Spruill

Sarah P. Spruill (S.C. Bar No. 68337)
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864.240.3200
sspruill@hsblawfirm.com

Alexander G. Mende (S.C. Bar No. 104699)
1201 Main Street 22nd Floor
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803.540.7856
amende@hsblawfirm.com

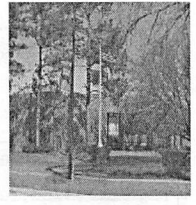
Adam N. Yount (S.C. Bar No. 76342)
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Charleston, SC 29401
843.720.4484
ayount@hsblawfirm.com

Attorneys for Skye Knight-Halman

November 2, 2023
Greenville, South Carolina



Newberry County Eighth Judicial Circuit Public Index



[Newberry County Home Page](#) [South Carolina Judicial Department Home Page](#) [SC.GOV Home Page](#)





Switch View

Beverly Flemon , plaintiff, et al VS Skye Knight Hallman

Case Number:	2023CP3600117	Court Agency:	Common Pleas	Filed Date:	02/28/2023
Case Type:	Common Pleas	Case Sub Type:	Minor Settlement 730	File Type:	Jury
Status:	Judgment	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Ended by Non Jury	Disposition Date:	04/04/2023	Disposition Judge:	Hocker, Donald B
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Flemon, Beverly	Filing/Other	Filing		10/20/2023-16:24		
Flemon, Beverly	NEF(10-17-2023 11:02:31 AM) Service/Affidavit Of Service	Filing		10/17/2023-11:02		
Flemon, Beverly	Service/Affidavit Of Service on Beverly Flemon	Filing		10/17/2023-11:02		
Flemon, Beverly	NEF(10-04-2023 02:26:50 PM) Letter/Letter	Filing		10/04/2023-14:27		
Flemon, Beverly	Letter/ Copy of Letter Sent With Order and Rule to Show Caus	Filing		10/04/2023-14:26		
Flemon, Beverly	NEF(10-04-2023 11:08:52 AM) Order/Other	Filing		10/04/2023-11:09		
Flemon, Beverly	Order/Order and Rule to Show Cause	Order		10/04/2023-11:08		
Flemon, Beverly	NEF(08-04-2023 10:29:12 AM) Order/Other	Filing		08/04/2023-10:29		
Flemon, Beverly	Order/Bench Order	Order		08/04/2023-10:29		
Flemon, Beverly	NEF(07-31-2023 02:12:03 PM) Order/Rule To Show Cause	Filing		07/31/2023-14:12		
Flemon, Beverly	Order/Rule To Show Cause	Order		07/31/2023-14:12		
Knight Hallman, Skye	NEF(06-02-2023 09:26:25 AM) Order/Approval Of Settlement	Filing		06/02/2023-09:26		
Knight Hallman, Skye	Order/Approval Of Settlement	Order		06/02/2023-09:26		
Knight Hallman, Skye	NEF(05-30-2023 02:43:42 PM) Notice/Notice of Appearance	Filing		05/30/2023-15:02		
Knight Hallman, Skye	Notice/Notice of Appearance	Filing		05/30/2023-14:43		

Knight Hallman, Skye	Order/Order Cover Sheet \$25.00	Filing		05/30/2023-14:43		
Flemon, Beverly	NEF(04-04-2023 08:20:06 AM) Order/Approval Of Settlement	Filing		04/04/2023-08:20		
Flemon, Beverly	Order/Approval Of Settlement	Order		04/04/2023-08:20		
Flemon, Beverly	NEF(03-30-2023 03:43:37 PM) Order/Order Cover Sheet \$25....	Filing		03/30/2023-16:06		
Flemon, Beverly	Order/Order Cover Sheet \$25.00	Filing		03/30/2023-15:43		
Flemon, Beverly	Petition/Filing Fee Required	Filing		02/28/2023-17:40		

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF NEWBERRY)	
)	
Beverly Flemon, as Mother and)	Case No. 2023-CP-36-00117
Guardian <i>ad Litem</i> of J.F., a minor)	
under fourteen (14) years of age,)	ORDER APPROVING MINOR
)	SETTLEMENT
)	
Plaintiff,)	
vs.)	
)	
Skye Knight-Hallman,)	
)	
Defendant.)	
_____)	

Upon reading the annexed Petition of Beverly Flemon, and the Full, Final and Complete Settlement Agreement and Release of the parent and proposed Guardian *ad Litem* of J.F., a minor, (the “Minor”), and after hearing such testimony as this Court required concerning the matter, it is the conclusion of this Court that the proposed settlement is in the Minor's best interest and should be approved. The net settlement to the Minor is Sixty-Five Thousand Seven Hundred and 63/100’s (\$65,700.63) Dollars, of which, Fifty Thousand Seven Hundred and 63/100’s (\$50,700.63) will be used by State Farm Fire & Casualty Company to purchase a structured annuity for the benefit of the minor, J.F., as fully described in the Exhibit A attached hereto. The remaining Fifteen Thousand and 00/100’s (\$15,000.00) Dollars will be used by the Plaintiff as Guardian *ad litem* for expenses associated with the Minor’s care.

The Minor and the Proposed Guardian *ad Litem* on behalf of the Minor have incurred medical bills, liens, and expenses. Plaintiff agrees that these amounts shall be satisfied out of the proceeds of this settlement.

Accordingly, it is:

ORDERED that Beverly Flemon, as the appointed Guardian *ad Litem* for the Minor is hereby authorized to prosecute said cause of action Skye Knight-Hallman and State Farm Fire & Casualty Insurance Company.

ORDERED that the settlement of the Minor's claim for personal injuries against Skye Knight-Hallman and State Farm Fire & Casualty Insurance Company for present the sum of One Hundred Thousand and 00/100's (\$100,000.00) Dollars, inclusive of cash and periodic payments as outlined in the Petition to Approve Minor Settlement, and it hereby is, approved; and

IT IS FURTHER ORDERED that the settlement of One Hundred Thousand and 00/100's (\$100,000.00) Dollars is to be disbursed as follows: Thirty-Four Thousand Two Hundred Ninety-Nine and 37/100's (\$34,299.37) Dollars for attorney's fees and costs payable to Attorney Tyler Bailey of Bailey Law Firm, LLC; and the net settlement to the Minor is Sixty-Five Thousand Seven Hundred and 63/100's (\$65,700.63) Dollars, of which, Fifty Thousand Seven Hundred and 63/100's (\$50,700.63) will be used by State Farm Fire & Casualty Company to purchase a structured annuity for the benefit of the minor, J.F., as fully described in the Exhibit A attached hereto. The remaining Fifteen Thousand and 00/100's (\$15,000.00) Dollars will be used by the Plaintiff as Guardian *ad litem* for expenses associated with the Minor's care.

IT IS FURTHER ORDERED that with respect to the Fifteen Thousand and 00/100's (\$15,000.00) Dollars being paid to the mother/Guardian, Beverly Flemon, the following conditions and restrictions shall apply:

1. The Court to be provided her current address and any subsequent address;
2. The Mother to be provided the Court's mailing address (P.O. Box 972, Laurens, SC 29360);
3. The Court to be provided the location of the account where the money will be on deposit;
4. On an every month basis on the 15th of every month beginning June 15, 2023, the Mother is to provide to the Court a written accounting of each disbursement made for the minor child to include:

- a. Monthly account statements;
- b. Description of each item purchased;
- c. Receipts for each purchase.

IT IS FURTHER ORDERED that Beverly Flemon, as appointed *Guardian ad Litem* for the Minor, is hereby authorized to consummate the settlement by receiving and receipting for said monies and by executing a binding Full, Final and Complete Settlement Agreement and Release on behalf of the Minor in favor of Skye Knight-Hallman and State Farm Fire & Casualty Company.

Hon. Donald B. Hocker
Judge, Eighth Judicial Circuit

_____, 2023
Newberry County, South Carolina

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF NEWBERRY)	
)	
Beverly Flemon, as Mother and)	Case No. 2023-CP-36-00117
Guardian <i>ad Litem</i> of J.F., a minor)	
under fourteen (14) years of age,)	
)	EXHIBIT A TO
)	COURT APPROVAL
Plaintiff,)	DESCRIPTION OF PERIODIC
)	PAYMENTS
vs.)	
)	
Skye Knight-Hallman,)	
)	
Defendant.)	
_____)	

Subject to the approval of the Court, State Farm Fire & Casualty Company has offered to pay the sums outlined below, inclusive of Cash and Periodic Payments. The current value or cost to State Farm Fire & Casualty Company, inclusive of Cash and Periodic Payments, is \$100,000.00.

1. **Cash:** \$49,299.37 is the Cash portion due at the time of settlement to Plaintiff(s) and their attorneys. This includes, but is not limited to, attorney fees, legal expenses, and liens.
2. **Periodic Payments:** \$50,700.63 is the cost to State Farm Fire & Casualty Company to provide for the schedule of future periodic payments outlined below. Disclosure of this cost has been required as a condition of settlement. No part of the cost being paid by State Farm Fire & Casualty Company to provide funding for the schedule of future periodic payments may be paid directly to Plaintiff(s) or their attorneys, inasmuch as the parties negotiated for a structured settlement as being in the best interest of the minor, J.F. State Farm Fire & Casualty Company agrees to pay, or cause to be paid, future periodic payments according to the schedule as follows ("Periodic Payments"):

To J.F. ("Payee"):

\$65,156.96 guaranteed lump sum paid payable on November 15, 2029.

All sums set forth herein constitute damages on account of personal physical injuries or physical sickness within the meaning of Internal Revenue Code Section 104(a)(2). This settlement is intended to conform to the requirements of Internal Revenue Code Section 130(c), and all provisions of this settlement should be construed in a manner so as to effectuate this intent.

State Farm Fire & Casualty Company will assign their obligation to make the Periodic Payments to MetLife Assignment Company, Inc. ("Assignee") in accordance with Internal Revenue Code Section 130(c). State Farm Fire & Casualty Company, itself or through its Assignee, will fund the liability to make the Periodic Payments through the purchase of an annuity policy from Metropolitan Tower Life Insurance Company ("Annuity Issuer"), rated A+XV by A.M. Best. The assignee shall be the sole owner of the annuity policy and shall have all rights of ownership. Assignee may have Annuity Issuer mail payments directly to Payee.

Plaintiff(s) shall be responsible for maintaining a current mailing address for Payee with Assignee and Annuity Issuer.

To fund the purchase of the Periodic Payments, State Farm Fire & Casualty Company will issue a check in the amount of \$50,700.63 payable to MetLife Assignment Company, Inc. (tax id# 38-4035918) and will execute the Qualified Assignment document as required by the Assignee and Annuity Issuer to issue policy.

All guaranteed Periodic Payments are guaranteed whether or not Payee survives the payment schedule. Any Periodic Payments to be made after the death of Payee shall be made to the estate of J.F. (“Beneficiary”). After the age of majority, Payee shall have the right to submit a request to change the Beneficiary by filing a written request with Assignee and Annuity Issuer. The change will be effective when approved by both Assignee and Annuity Issuer. Any change in Beneficiary shall not in any way affect or alter any provision of this agreement.



Newberry Common Pleas

Case Caption: Beverly Flemon , plaintiff, et al VS Skye Knight Hallman

Case Number: 2023CP3600117

Type: Order/Approval Of Settlement

Circuit Court Judge

s/Donald B. Hocker, Judge Code 2167

STATE OF SOUTH CAROLINA)
)
COUNTY OF NEWBERRY)

IN THE COURT OF COMMON PLEAS

BEVERLY FLEMON, as Mother)
and Guardian of J.F., a minor)
under fourteen (14) years of age)

ORDER AND RULE TO SHOW CAUSE
2023-CP-36-00117

Plaintiff)

vs.)

Skye Knight-Halman)
)
)
)
)
)
)
)
)
)

TO: BEVERLY FLEMON

Upon this Court's own Motion:

This Court approved a minor settlement by Order, dated June 2, 2023, wherein the following was approved:

1. Total settlement of \$100,000.00;
2. Attorney's Fees and Costs of \$34,299.37;
3. Net to minor of \$65,700.63 to be divided by \$50,700.63 into a structured annuity and the balance of \$15,000.00 to be paid to the Guardian/Mother for expenses associated with the minor's care;
4. In this Order, there were certain responsibilities placed on the Guardian/Mother as follows: Provide the Court with the location where the money will be on deposit; On an every month basis on the 15th of every month beginning June 15,

#1
JBA

2023 the Mother is to provide the Court a written accounting of disbursement made for the minor to include monthly account statements, description of each item purchased, and receipts for each purchase.

The Guardian/Mother was provided a copy of this Order by Counsel on June 9, 2023. In addition, the Court provided another copy to the Guardian/Mother by letter on July 18, 2023 and this Court reminded the Guardian/Mother in this letter of her responsibilities and gave her until July 26, 2023 to provide the Court with the information as required in the Order. The mother provided one statement from Navy Federal Credit Union on 8/1/23 but has further failed to comply with the Order.

Accordingly, it is Hereby Ordered:

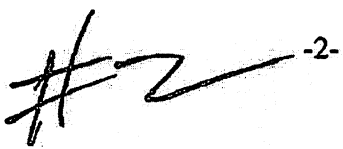
That you the Guardian/Mother, Beverly Flemon, appear before this Court at the Newberry County Courthouse, 1226 College Street, Newberry, SC 29108, on October 25, 2023 at 9:15 a.m. and show cause, if any you can, why you should not be held in contempt of Court for failing to comply with the above Order.

So Ordered.



DONALD B. HOCKER
CIRCUIT COURT JUDGE

Laurens, South Carolina
Date: 10-3-23

 -2-

FORM 1
NOTICE OF APPEAL IN A CIVIL CASE

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

RECEIVED

OCT 20 2023

SC Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

DONALD B.HOCKER, Circuit Court

Judge

Case No. 2023-CP-36-00117

FILED
NEWBERRY COUNTY
2023 OCT 20 PM 4:20
ELIZABETH P FOLIN
CLERK OF COURT

Beverly Flemon

Respondent,

v.

Skye Knight-Halman

Appellant.

NOTICE OF APPEAL

Beverly Flemon appeals the order [judgment] of the Oct 4, 2023. Appellant received written notice of entry of this order [judgment] on Oct.11, 2023

Oct 20, 2023

Beverly Flemon
Post Office Box 167
Pomaria, South Carolina 29126
(839) 228-3857

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

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

RECEIVED

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

OCT 20 2023
SC Court of Appeals

DONALD B. HOCKER, Circuit

Court Judge

Case No. 2023-CP3600117

Beverly Flemon,

Respondent,

v.

Skye Knight-Halman,

Appellant.

FILED
NEWBERRY COUNTY
2023 OCT 20 PM 4:20
ELIZABETH P. FOLLI
CLERK OF COURT

PROOF OF SERVICE

Beverly Flemon (839)228-3857 PO BOX 167
Pomaria, SC 29126

October 20, 2023

STATE OF SOUTH CAROLINA)
COUNTY OF NEWBERRY)

IN THE COURT OF COMMON PLEAS

BEVERLY FLEMON, as Mother)
and Guardian of J.F., a minor)
under fourteen (14) years of age)

Plaintiff)

vs.)

Skye Knight-Halman)
_____)

ORDER AND RULE TO SHOW CAUSE
2023-CP-36-00117

RECEIVED

OCT 20 2023

SC Court of Appeals

TO: BEVERLY FLEMON

Upon this Court's own Motion:

This Court approved a **minor** settlement by Order, dated June 2, 2023, wherein the following was approved:

1. Total settlement of \$100,000.00;
2. Attorney's Fees and Costs of \$34,299.37;
3. Net to minor of \$65,700.63 to be divided by \$50,700.63 into a structured annuity and the balance of \$15,000.00 to be paid to the Guardian/Mother for expenses associated with the minor's care;
4. In this Order, there were certain responsibilities placed on the Guardian/Mother as follows: Provide the Court with the location where the money will be on deposit; On an every month basis on the 15th of every month beginning June 15,

#1
DBA

RECEIVED OCT 05 2023

2023 OCT 04 11:08 AM - NEWBERRY - COMMON PLEAS - CASE#2023CP3600117

2023 the Mother is to provide the Court a written accounting of disbursement made for the minor to include monthly account statements, description of each item purchased, and receipts for each purchase.

The Guardian/Mother was provided a copy of this Order by Counsel on June 9, 2023. In addition, the Court provided another copy to the Guardian/Mother by letter on July 18, 2023 and this Court reminded the Guardian/Mother in this letter of her responsibilities and gave her until July 26, 2023 to provide the Court with the information as required in the Order. The mother provided one statement from Navy Federal Credit Union on 8/1/23 but has further failed to comply with the Order.

Accordingly, it is Hereby Ordered:

That you the Guardian/Mother, Beverly Flemon, appear before this Court at the Newberry County Courthouse, 1226 College Street, Newberry, SC 29108, on October 25, 2023 at 9:15 a.m. and show cause, if any you can, why you should not be held in contempt of Court for failing to comply with the above Order.

So Ordered.



DONALD B. HOCKER
CIRCUIT COURT JUDGE

Laurens, South Carolina
Date: 10-3-23



-2-

STATE OF SOUTH CAROLINA)
)
 COUNTY OF SC)
)
 Beverly Flemon)
 _____)
 Plaintiff,)
 vs.)
 _____)
 Skye Knight-Halman)
 Defendant.)

IN THE COURT OF COMMON PLEAS
 FOR THE _____ JUDICIAL CIRCUIT

**APPLICATION FOR WAIVER OF
 PAYMENT OF NEUTRAL FEES**

RECEIVED

OCT 20 2023

SC Court of Appeals

Docket No. _____

NAME OF APPLICANT	Beverly Flemon
ADDRESS	162 St. Pauls Rd
CITY, STATE, ZIP CODE	Pomaria SC 29126
TELEPHONE NUMBER(S)	839-228-3857

1. Are you presently employed? Yes No
 a. If "yes," state the amount of your salary or wages per month, and give the name and address of your employer.

SALARY OR WAGES PER MONTH	NAME AND ADDRESS OF EMPLOYER	FULL OR PART TIME

- b. If "no," state the name and address of last employment, date of termination of employment, and amount of your salary or wages per month.

SALARY OR WAGES PER MONTH	NAME AND ADDRESS OF EMPLOYER	TERMINATION DATE

2. List by name, age and relationship to you, any persons who are dependent upon you for support. Indicate beside each how much you contribute toward their support.

NAME	AGE	RELATIONSHIP	AMOUNT OF SUPPORT

3. **Have you received within the past twelve (12) months any money from any of the following sources?**

- a. Business, profession or form of self-employment? Yes No
- b. Rent payments, interest or dividends? Yes No
- c. Pensions, annuities or life insurance payments? Yes No
- d. Gifts or inheritances? Yes No
- e. Any other sources? Yes No

If the answer to any of the above is "yes," describe each source of money and state the amount received from each and by whom during the past twelve months.

SOURCE OF MONEY	AMOUNT
child support	356.00 biweekly

4. **Do you own cash, or do you have any money in a checking or savings account?**
 Yes No

If the answer is "yes" state the total amount of the cash and owner: \$

5. **Do you own any real estate, stocks, bonds, notes, or other valuable property (excluding ordinary household furnishings and clothing)?**

Yes No

If the answer is "yes," describe the property and the state the appropriate value of the items owned and who owns it:

PROPERTY	AMOUNT

6. **What kind of motor vehicle do you and/or the alleged incapacitated individual own?**

Year: Make: Model:

Is it paid for? Yes No

If not, what is the monthly payment? \$

7. **How much do you owe (on liens, mortgages, other encumbrances or debts)? \$**

I do solemnly swear that the above information is a true and full account of all my real and personal estate, debts, credits and effects whatsoever without exception, whether they are assets which I control, assets that any person is holding in trust for me, or in which I have any interest. I have not recently, directly or indirectly sold, leased, assigned or otherwise disposed of or made over, in trust for myself or otherwise, other than is mentioned here.

I do solemnly swear I am financially unable to pay the Neutral Fees associated with the mandatory mediation required by the Court.

This 20 day of OCT, 2023


Applicant Signature

Subscribed and sworn to before me this _____ day of _____,

Notary Public for South Carolina
My Commission Expires: _____



The Application for Waiver of Payment of Neutral Fees is hereby Granted / Denied.

Dated: _____

Judge/Clerk or Deputy Clerk

_____, South Carolina

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Nov 02 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

Hon. Donald B. Hocker, Eighth Judicial Circuit

Case No. 2021-CP-36-00117
Appellate Case No. 2023-001654

Beverly Flemon, as Mother and Guardian of J.F., a minor under
fourteen (14) years of age.Appellant,

v.

Skye Knight-HalmanRespondent.

PROOF OF SERVICE

I certify that I have served the Notice of Appearance and Motion to Dismiss, or, in the
Alternative, to Remove Skye Knight-Halman as a Respondent on counsel of record on November
2, 2023, by electronic mail only to the following:

Tyler D. Bailey
Bailey Law Firm, L.L.C.
PO Box 532
Columbia, SC 29202
tyler@baileylawfirm.com

and by depositing a copy of the same in the United States Mail, postage prepaid, on November 2,
2023, addressed to:

Beverly Flemon
PO Box 167
Pomaria, SC 29126

Stacey Carberry

Stacey Carberry, Legal Assistant
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
Greenville, SC 29602

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Nov 02 2023

SC Court of Appeals

HAYNSWORTH
SINKLER BOYD

HAYNSWORTH SINKLER BOYD, P.A.
ONE NORTH MAIN STREET, 2ND FLOOR
P.O. BOX 2048 (29602)
GREENVILLE, SOUTH CAROLINA 29601
MAIN 864.240.3200
FAX 864.240.3300
www.hsblawfirm.com

SARAH P. SPRUILL
DIRECT 864.240.3220
sspruill@hsblawfirm.com

November 2, 2023

VIA EMAIL & U.S. MAIL

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

Re: *Beverly Flemon v. Skye Knight-Halman*
Appellate Case No. 2023-001654

Dear Ms. Kitchings:

This firm represents the Respondent in the above-captioned matter. Enclosed for filing, please find the Notice of Appearance and Motion to Dismiss, or, in the Alternative, to Remove Skye Knight-Halman as a Respondent together with our Proof of Service for the same. Also enclosed is our firm's check to cover the cost of the filing fee (w/ mailed copy).

Please note service on counsel of record by copy of this letter. If you have any questions, please give me a call. Thank you for your assistance in this matter.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac

Enclosure

cc: Tyler Desmond Bailey (tyler@baileylawfirm.com)
Beverly Flemon