

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
CIRCUIT COURT

Maite Murphy, Circuit Court Judge

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

100832
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JAN 18 2024
SC Court of Appeals

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

v.

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

APPELLANTS' MOTION TO AMEND DESIGNATION OF MATTER

Appellant hereby moves to amend their Designation of Matter to replace Appellant's Final Brief to Circuit Court #20; Respondent's Final to Circuit Court #21 and Appellant's Final Reply Brief to Circuit Court #22. The grounds for this motion are as follows:

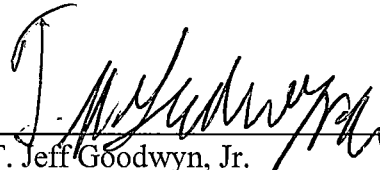
1. Appellant filed and served their Designation of Matter on October 10, 2023.
2. Appellant included the above-named exhibits in the Designation of Matter but mistakenly failed to notice that those exhibits were never filed with the Circuit Court.

3. Appellant would like to replace those exhibits with the following exhibits which have been filed with the Circuit Court: Initial Brief of Appellants, Brief of Respondent and Initial Reply Brief of Appellants.

For the reasons stated above, Appellants respectfully moves this Court for an order allowing them to amend their previously filed Designation of Matter.

Respectfully submitted,

GOODWYN LAW FIRM, LLC



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Attorney for Appellants

Columbia, South Carolina
January 18, 2024

Other Counsel of Record:

Joyce Farr Cheeks, J.D., M.B.A.
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Counsel for Respondent

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

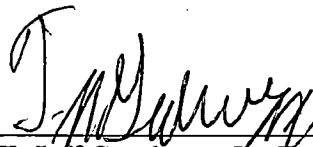
v.

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

PROOF OF SERVICE

I certify that I have served the **Motion to Amend Designation of Matter** on the following
Joyce Farr Cheeks, Esquire, counsel for the Respondent, via email and at the address listed below by
depositing a copy of same in the United States Mail, postage prepaid, on January 18, 2024.

Joyce Farr Cheeks, Esquire
Post Office Box 881
Columbia, SC 29202
joycecheeks@gmail.com



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January 18, 2024

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

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

January 18, 2024

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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

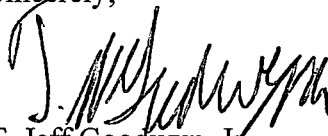
Dear Ms. Kitchings:

Enclosed please find an original and one copy of **Appellants' Motion to Amend the 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. Also, enclosed is a check in the amount of \$50.00 representing the fees for filing this Motion.

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