

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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FEB 29 2024  
SC Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Master and Equity

Shannon M. Phillips, Master and Equity Judge

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APPELLATE CASE NO.: 2022-001304

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Kesha Petty, Appellant

v.

Cathy Biggerstaff, individually and as owner of B&B Amusement, Inc., and B&B Amusement, Inc., Respondent.

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APPELLATE'S RESPONSE TO RESPONDENT'S MOTION TO DISMISS

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Kesha Petty  
553 Chastine Drive  
Spartanburg, SC 29301  
Appellant


February 25, 2024  
Spartanburg, South Carolina

COMES NOW Appellant in reply to Respondents' Motion to Dismiss. Appellant filed a final brief on or about July 05, 2023. Appellant does not believe that she "completely changed" her final brief as the grounds for her appeal did not change, however Respondents did not agree. According to Respondents' Motion, an Order dated November 20, 2023, was issued requiring Appellant to Amend her Final Brief within thirty (30) days. However, Appellant has not received a copy of this Order and therefore, was not aware of the requirement and time restraint to file her Amended Final Brief. Appellant would not have ignored any order and/or requirements had she been given notice.

In light of this fact, Appellant respectfully requests the Court deny Respondents' Motion to Dismiss and allow Appellant to submit an Amended Final Brief. Appellant submits that no prejudice will result to Respondent to allow Appellant to submit an Amended Final Brief.

Wherefore, the Appellant respectfully requests that the Respondents' Motion to Dismiss is denied and that Appellant be granted the opportunity to submit an Amended Final Brief.

Respectfully Submitted,

  
Keshia Petty Edwards  
553 Chastine Drive  
Spartanburg, SC 29301  
(864) 376-7780  
**Appellant**

February 25, 2024  
Spartanburg, South Carolina

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**CERTIFICATE OF SERVICE**

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The undersigned certifies that on February 25, 2024, the Reply of the Appellant were served upon all counsel of record in this matter by depositing a copy in first-class, postage -paid envelope, into a depository under the exclusive care and custody of the United States Postal Service and by electronic delivery on February 25, 2024, as addressed as follows:

R. Jay Anthony  
650 E. Washington Street  
Greenville, SC 29601  
[janthony@anthonylawsc.com](mailto:janthony@anthonylawsc.com)

Respectfully Submitted,

s/Kesha Petty-Edwards  
Kesha Petty Edwards  
553 Chastine Drive  
Spartanburg, SC 29301  
(864) 376-7780  
**Appellant**

Resha Edwards  
553 Chastine Drive  
Spartanburg, SC 29301



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SC Court of Appeals

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

