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APR 02 2024

SC Court of Appeals

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

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

v.

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

**APPELLANTS' MOTION TO FILE AN AMEND RECORD ON APPEAL**

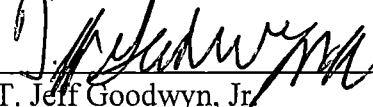
Appellant hereby moves to amend the Record on Appeal due to pages being indexed and numbered incorrectly. The grounds for this motion are as follows:

1. Appellant's counsel filed and served their Record on Appeal on or about March 11, 2024.
2. Respondent's counsel brought the incorrect page number in the record error to Appellant counsels' attention via email on March 28, 2024.
3. The parties need a properly paginated record on appeal in order to make proper cites to the record and the court needs it corrected to be able to reference the proper cites.

For the reasons stated above, Appellants respectfully moves this Court for an order allowing them to amend their previously filed Record on Appeal to correct the page numbers and index.

Respectfully submitted,

**GOODWYN LAW FIRM, LLC**



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Attorney for Appellants

Columbia, South Carolina  
April 2, 2024

Other Counsel of Record:

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

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APPEAL FROM RICHLAND COUNTY  
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Case No.: 2022-CP-40-05570

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

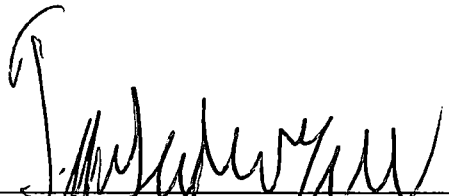
v.

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

**PROOF OF SERVICE**

I certify that I have served the **Appellants' Motion to Amend the Record on Appeal and Appellants' Motion for Extension for both Parties' Counsel to file their Final Brief(s)** on the following, Joyce Farr Cheeks, Esquire, counsel for the Respondent, at the address listed below by depositing a copy of same in the United States Mail, postage prepaid, on April 2, 2024.

Joyce Farr Cheeks, Esquire  
Post Office Box 881  
Columbia, SC 29202



T. Jeff Goodwyn, Jr., Esquire  
Goodwyn Law Firm, LLC  
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April 2, 2024

T. Jeff Goodwyn, Jr.\*†  
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† Certified Circuit Court Mediator  
\*\* Of Counsel

April 2, 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 Record on Appeal**

Also, enclosed please find an original and one of **Appellants' Motion for Extension for Both Parties' Counsel to file their Final Brief(s)**, along with a Proof of Service, for filing in regards to the above referenced matter.

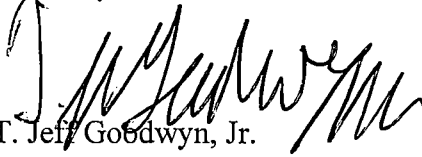
Please have your office file the originals and return a stamped copy to my office in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$100.00 representing the fees for filing both these Motions.

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

# GOODWYN LAW FIRM, LLC

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

Sincerely,

A handwritten signature in black ink, appearing to read "T. Jeff Goddwyn, Jr.", written in a cursive style.

T. Jeff Goddwyn, Jr.

TJG/msb

Enclosures

cc: Joyce F. Cheeks, Esquire