

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF RICHLAND )  
 )  
Roberta Moore, )  
 )  
Appellant (Plaintiff), )  
 )  
vs. )  
 )  
 )  
 )  
Rebecca Giesler, )  
 )  
Appellee (Defendant). )  
\_\_\_\_\_ )

IN THE COURT OF APPEALS  
JUDICIAL CIRCUIT

CASE No.: 2023-CP-29-00493

REQUEST FOR APPEAL

PLEASE TAKE NOTICE that Plaintiff and Appellant, Roberta Moore, hereby respectfully requests an appeal from the order granting Summary Judgment granted by Judge Brian Gibbons on March 5, 2024 with final paperwork being filed on March 26, 2024 by Defendant.

#### RATIONALE FOR REQUEST

1. Appeal requested based on the Defendant's failure to file Formal Order within the specified 10-day deadline ordered by Judge Brian Gibbons in notice granting summary judgment on March 5th, 2024.
2. Appeal requested based on Defendant's request for discovery was for items that were already a matter of public record on the public index (and/or) authored (and/or) signed by the Defendant. Defendant abused the discovery process by making unnecessary requests for materials that she already had in possession and by asking questions and for materials that had no relevance to the case. The Defendant's request for discovery was unreasonably cumulative and duplicative and placed more unwarranted burden on the Plaintiff and should not have been allowed. *Greyhound Corp. v. Sup Ct (Clay) 56 C2d at 384-385*. Answers and materials requested had already been given in previous responses in prior documents served upon Defendant.

*(According to CCP 2019.030, the court shall restrict the frequency of extent of use of a particular discovery method if it determines that*

- *the discovery sought is unreasonably cumulative or duplicative, or is obtainable from some other source that is more convenient, less burdensome or less expensive.*
- *the selected method of discovery is unduly burdensome or expensive, taking into account the needs of the case, the amount in controversy and the importance of the issues at stake in the litigation.*

3. Appeal requested based on Defendant's request for summary judgment omitted contract addendum that was in dispute which is already a part of the public record and a relevant part of the case as indicated previously by Judge Brian Gibbons issuing an order continuing that portion of the case previously.

4. Appeal requested based on Defendant's request for summary judgment should not have been granted based on the material evidence given to show that a criminal act of extortion was in question that is a part of public record and Judge Brian Gibbons issuing an order continuing that portion of the case previously.

Respectfully Submitted,



Roberta Moore  
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APPELLANT, PLAINTIFF, PRO SE

Indian Land, South Carolina

April 2nd, 2024

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF LANCASTER )

IN THE COURT OF APPEALS  
JUDICIAL CIRCUIT

Roberta Moore )

**CERTIFICATE OF SERVICE**

Appellant / Plaintiff, )

vs. )

Rebecca Geisler )

Case No: 2023CP2900493

Defendant. )

I certify that on this date, I served a copy of Request For Appeal to Defendant by mailing a copy to the Defendant's Attorney Of Record, Jennifer M. Cloud, Esq in this action, dated April 2, 2024, on April 2, 2024 by

- Delivering it to him/her personally;
- Mailing it to him/her, at his/her last known address, by depositing it in the U.S.

Mail, in an envelope with sufficient postage affixed, addressed as follows:

\_\_\_\_\_

- Delivering it by commercial delivery service in accordance with Rule 4(d)(9), SCRPC, addressed as follows:

\_\_\_\_\_

or,

- Other:

By depositing a copy of it in the United States Mail, postage prepaid, on April 2nd, 2024, by depositing the same in the custody of the United States Postal Service, overnight mail, with sufficient postage affixed to the following:

Rebecca Giesler  
c/o Jennifer M. Cloud, Esq  
Cloud Law Firm  
1467 Ebenezer Road

Rock Hill, SC 29732

(See Rule 5(b)(1), SCRCP)

4/2/24  
Date

Robert Lee Hoose  
Signature

SCCA 255 (05/2013)