

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY
CIRCUIT COURT

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SEP 05 2024

Maite Murphy, Circuit Court Judge

SC Court of Appeals

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 ALLOW CONSIDERATION OF
APPELLANT'S FINAL BRIEF AND FINAL REPLY BRIEF**

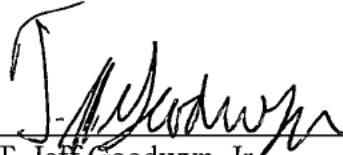
Appellant hereby moves pursuant to Rule 240 of the S.C.A.C.R to allow the court to consider her Final Brief and Final Reply Brief that were filed August 28, 2024. The grounds for this motion are as follows:

Appellant filed its Initial Brief and Designation of Matter October 10, 2023 and its Initial Reply Brief December 12, 2023. After the Record on Appeal was prepared and filed, Respondent's Counsel pointed out a mistake in the numbering and the documents included. Appellant filed a motion to amend the Designation of Matter and the Record on Appeal which was granted and the Record on Appeal was corrected. These corrections did not alter the previously filed initial brief and it was understood that another initial brief would not be required to be filed.

Once the Record on Appeal was corrected and filed, Appellant filed its Final Brief and Final Reply Brief on August 28, 2024. Appellant respectfully asks the court to consider these final briefs in light of the unusual procedural history of this appeal.

Respectfully submitted,

GOODWYN LAW FIRM, LLC



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Columbia, South Carolina
September 5, 2024

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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 Allow Consideration of Appellant's Final Brief and Final Reply Brief** on the following, counsel for the Respondent, at the address listed below by depositing a copy of same in the United States Mail, postage prepaid, and via Email on September 5, 2024.

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Law Office of Joyce Farr Cheeks, P.C.
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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

September 5, 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
P.O. Box 11629
Columbia, SC 29211

RE: *Alisha Baity, et al. v Geraldine Vaenssa Myers-Moore*
Appellate Case No.: 2023-001423
Our File No.: 3000-0626

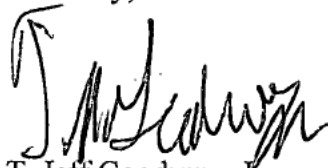
Dear Ms. Kitchings:

Enclosed for filing, please find the **Appellants' Motion to Allow Consideration of Appellant's Final Brief and Final Reply Brief**, along with a check in the amount of \$50.00 and Proof of Service in regards to the above referenced matter. Please return a filed copy of the Proof of Service in the self-addressed stamped envelope.

As evidenced in the Proof of Service, I have served all interested parties with a copy.

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:cnc

Enclosures

cc: Joyce Farr Cheeks, J.D., M.B.A. (via email and mail)