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Nov 14 2024

SC Court of Appeals

**NOTICE OF APPEAL IN A CIVIL CASE**  
THE STATE OF SOUTH CAROLINA  
In The Court of Appeals [In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas Alex Kinlaw, Common Pleas

Appellate Case No. 2024-001914

J. Mereinda Fisher, individually, and as Respondent,  
Member of Fisher and Reid, LLC,

v.  
Cynthia J. Glenn, individually, and as  
Member of Fisher and Reid, LLC, and  
Carolina Birth Center, LLC d/b/a  
Carolina Water Birth, Defendants,

Of which Cynthia J. Glenn, individually,  
and as Member of Fisher and Reid,  
LLC is the Appellant.

**Petition to Correct Title,**  
**or else to Adjoin Appellants**

Cynthia-J: Glenn <sup>TM</sup> has previously appealed the orders of Alex Kinlaw and received notice from the court on November 13, 2024 that only Cynthia J Glenn, individually and as a Member of Fisher and Reid, LLC are currently considered appellants. As testified in the notarized and undisputed Notice of Appearance that was prefiled with Greenville County Common Pleas as well as served on opposing counsel, Cynthia-J: Glenn is the agent for CYNTHIA GLENN, the registered agent for the dissolved CYNTHIA GLENN LLC who was the registered agent for the dissolved Carolina Birth Center LLC. I notified the lower court that I have full power to act in the same manner as the principle and gave notice as Agent/Attorney in-fact or next friend, for Lawful Counsel, acting on behalf of the Principles.

This appeal stems from a challenge of jurisdiction on behalf of Carolina Birth Center LLC as well as on behalf of the listed parties Cynthia J Glenn <sup>TM</sup> , Individually and as a potential

member of Fisher and Reid LLC.

As the challenges of jurisdiction equally affect Carolina Birth Center LLC and adding them as a separate appellant would be confusing as well as an inefficient expenditure of time and resources, I now petition the court to correct the title or if not then to join Carolina Birth Center LLC to the appeal under the same statements on appeal:

"under Rule 12(b)(1),(2),(3),(4),(5) and (7) and Jurisdictional bars "may be raised at any time", courts have a duty to consider them, (WILKINS v. UNITED STATES 13 F. 4th 791), can never be forfeited or waived." (United States v. Cotton, 535 U. S. 625, 630 (2002)) and the challenge involves the merits of the actions pursuant to section 14-3-330(1); this appellant now appeals the order of dismissal."

Cynthia-J: Glenn 1 11/14/24  
Cynthia-J: Glenn <sup>TM</sup>, Sui Juris  
411 West Main Street, ICO Unit 87 Gray Court,  
South Carolina 29645  
864.350.2830  
Appealing

Other Counsel of Record:

Duggan and Hughes

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and

Brice Garrett

305 E. North Street

Greenville County Courthouse

Greenville, SC 29601

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals [In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas Alex Kinlaw, Common Pleas  
Case No. 2024LP2300640 (associated case 2022CP2301799)

J. Mereinda Fisher, individually, and  
as Member of Fisher and Reid, LLC

Respondent,

v.

Cynthia J. Glenn <sup>TM</sup>, individually, and as  
Member of Fisher and Reid, LLC, and  
Carolina Birth Center, LLC d/b/a  
Carolina Water Birth  
Defendants

Appellant.

PROOF OF SERVICE

Petition to Correct Title, or else to Adjoin Appellants on 11/14/24: Duggan  
and Hughes 457 Pennsylvania Ave # B, Greer, SC 29650 Email: [info@dugganhughes.com](mailto:info@dugganhughes.com)  
Phone: 864.334.2500.

Cynthia-J: Glenn 1 11/14/24  
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411 West Main Street, ICO Unit 87 Gray Court,  
South Carolina 29645  
864.350.2830  
Appealing

cc: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)