

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
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SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

G. D. Morgan, Jr., Circuit Court Judge

Appellant Case No. 2025-001843
Civil Action Case No.
2025-CP-46-01222

Brenda Burris

Respondent,

v.

Tonya R. Blake, Individually
and as Personal Representative for
The Estate of Reco D. Miller

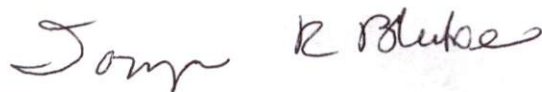
Appellant.

PROOF OF SERVICE

I certify that I have served the return to the motion to dismiss on the SC Court of Appeals by depositing a copy of it in the United States Mail, postage prepaid, on October 30, 2025, addressed to the SC Court of Appeals, 1220 Senate Street, Columbia, SC 29201. Appellant hereby moves the court to deny Respondent's motion to dismiss the appeal because appellant did everything this court asked her to do within the time frame allowed. See exhibits A, B, C, and D. Appellant sent notice of appeal and in forma pauperis documents to Murphy and Grantland, PA 4406B Forest Drive, Columbia, Sc 29206, in which Attorneys E. Raymond Moore III and Santino U. Ambrosini work and have forms in their possession, so they have been served. Documents were also mailed to the Court of Common Pleas, 1675 York Hwy, York, 29745. See Exhibit E. Appellant even sent proof of sending documents to this court by sending receipts, also see Exhibit F.

Respondent's statement about Appellant being represented by an attorney at the time of appeal is inconsistent with the facts. Lawyer Taylor Grooms withdrew from the case on August 14, 2025. See Exhibit G.. The appeal was filed on September 10, 2025. Almost a month after Lawyer Grooms sent a closing letter saying he would not be handling the appeal. I am just a single mother trying to take care of her 27-year-old autistic special needs son alone and do the best I can with this case. My husband, Reco Miller, burned to death in front of me, calling my name, and there was nothing I could do because there were no warning smoke detectors, and Brenda Burris definitely knew her home didn't have smoke alarms. While we were sleeping, the fire went too long without detection in Brenda Burris's home, and her insurance company, Foremost Insurance, only wanted to offer me 15,000 dollars total disrespect in itself. I have a whole dead husband here, no support with our special needs son. I did not ask for any of this to happen, but it did. I had to represent myself after Lawyer Grooms left me holding the bag. I didn't choose any of this.

These are the reasons the Pro se Appellant asks the Court of Appeals to deny the motion to dismiss brought by the Respondent.



October 30, 2025

Tonya R. Blake
201 Sidney Street
Rock Hill, South Carolina 29730
(803) 371-3324
Pro se Appellant



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
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1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

September 11, 2025

Mr. Taylor Lawrence Grooms, Esquire
1643B Savannah Highway
#335
Charleston SC 29407

Re: Tonya R. Blake v. Brenda Burris
Appellate Case No. 2025-001843

Dear Counsel:

Upon reviewing your client's motion to proceed in forma pauperis, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or the filing will not be considered:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script that reads "Jenny A. Kitchings".

CLERK

cc: Santino Umberto Ambrosini, Esquire
Edward Raymond Moore, III, Esquire
Tonya R. Blake

A



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

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September 11, 2025

Mr. Taylor Lawrence Grooms, Esquire
1643B Savannah Highway
#335
Charleston SC 29407

Re: Tonya R. Blake v. Brenda Burris
Appellate Case No. 2025-001843

Dear Counsel:

Upon reviewing your client's notice of appeal, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or this matter will be dismissed:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- You must provide proof of filing with the court of common pleas.

Very truly yours,

Handwritten signature of Jenny A. Kitchings in cursive.

CLERK

cc: Santino Umberto Ambrosini, Esquire
Edward Raymond Moore, III, Esquire
Tonya R. Blake

B

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Brenda Burris

Respondent,

v.

Tonya R. Blake, Individually
and as Personal Representative for
The Estate of Reco D. Miller

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Brenda Burris by depositing a copy of it in the United States Mail, postage prepaid, on September 18, 2025, addressed to her attorney of record, Santino Umberto Ambrosini, Esquire, and Edward Raymond Moore, Esquire, at Murphy and Grantland, P.A., 4406-B Forest Drive, Columbia, S.C. 29206.

September 18, 2025

Tonya R. Blake
201 Sidney Street
Rock Hill, South Carolina 29730
(803) 371-3324
Appellant

C

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APPEAL FROM YORK COUNTY
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G. D. Morgan, Jr., Circuit Court Judge

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Brenda Burris

Respondent,

v.

Tonya R. Blake, Individually
and as Personal Representative for
The Estate of Reco D. Miller

Appellant.

PROOF OF SERVICE

I certify that I have informed Brenda Burris that I have motioned the court to proceed in forma pauperis by depositing a copy of it in the United States Mail, postage prepaid, on September 18, 2025 to her attorneys Santino Umberto Ambrosini and Edward Raymond Moore to 4406 B Forest Dr. Columbia, SC 29206.

September 18, 2025

Tonya R. Blake
201 Sidney Street
Rock Hill, South Carolina 29730
(803) 371-3324
Appellant

D

G

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YORK SC 29745-8833



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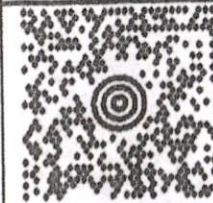
TONYA BLAKE
8033713324
TONYA BLAKE
201 SIDNEY STREET
ROCK HILL SC 29730

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DWT: 12,10,1

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MURPHY AND GRANTLAND PA
4406B FOREST DRIVE
COLUMBIA SC 29206-3104

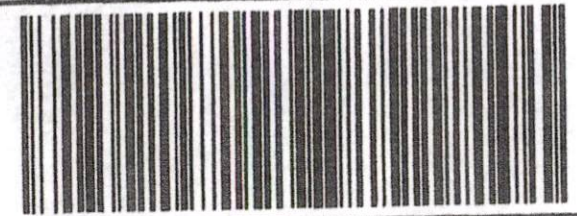


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Price

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GROOMS
LAW FIRM

4 Carriage Lane, Suite 301, Charleston, SC 29407 | Telephone: (843) 375-6505 | Fax: (843) 278-2083 | www.groomsfirm.com

August 14, 2025

SENT ONLY VIA EMAIL

Tonya Blake

torreco@comporium.net

Tonya,

I regret to inform you the judge has granted defense counsel's Motion to Dismiss; which ends your case. Per our agreement, I will bear the responsibility of the case costs/expenses and my time spent on the case, and you do not owe us or Steinberg Law Firm any money.

We received the judge's Order late yesterday afternoon, so you have thirty (30) days from yesterday to file your appeal. I cannot advise you on appellate matters as (a) that is not my specialty and (b) I am not going to be handling any appeal in this case.

Please know that if you do not file certain things within particular timeframes, that your rights to an appeal can be waived. I would encourage you to consult with an appellate lawyer and seek their advice on matters pertaining to a potential appeal.

As I previously indicated, there was a settlement offer on the table that you declined as you wanted at least \$350,000.00 to settle the case. However, if your stance has changed since yesterday, I would still be happy to call defense counsel and see if there may still be a settlement offer on the table. Should you wish for me to do this, please reply in the affirmative within one business day of your receipt of this letter authorizing me to perform such action.

If I do not hear from you or you indicate you do not wish for me to perform this action, then I will consider your case closed and the attorney-client relationship terminated by virtue of the lawsuit being dismissed. Please let us know the mailing address to which we can mail you a copy of your file. Thank you again.

{Signature block to follow}

6

Subject: Lawsuit Dismissed

Tonya,

Good afternoon. See attached correspondence. Feel free to call with any questions. Thank you for the opportunity to serve you in this matter.

Taylor L. Grooms

Attorney

Grooms Law Firm, LLC

4 Carriage Lane, Suite 301

Charleston, SC 29407

(843) 375-6505 (Telephone)

(843) 278-2083 (Fax)




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LAW FIRM

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