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May 15 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Complete Heat & Air, LLC,
Respondent,

v.

Michelle Lindsay and Shaun Lindsay,
Appellants.

Appellate Case No. 2026-001025
Lower Court Case No. 2024-CP-39-00404

**MOTION TO AMEND NOTICE OF APPEAL TO REFLECT ADDITIONAL
APPELLANT**

Appellant Shaun Lindsay respectfully moves pursuant to Rule 240, SCACR, to amend the previously filed Notice of Appeal to reflect Michelle Lindsay as an additional Appellant in the above-captioned matter.

In support of this Motion, Appellant respectfully shows the Court as follows:

1. The underlying matter in Pickens County Case No. 2024-CP-39-00404 involved both Michelle Lindsay and Shaun Lindsay as Defendants.
2. The Notice of Appeal filed on April 22, 2026 identified Shaun Lindsay as the appealing party.
3. Subsequent appellate filings, including the Emergency Motion for Stay and related filings associated with Appellate Case No. 2026-001025, referenced Michelle Lindsay and Shaun Lindsay collectively as “Appellants” due to the overlapping jurisdictional, enforcement, property, accounting, service, and due process issues affecting both parties.
4. Michelle Lindsay’s interests are directly implicated by the proceedings presently under appellate review, including matters affecting the subject property, enforcement proceedings, accounting disputes, service issues, and related orders arising from the underlying matter.

4A. Appellant respectfully submits that the use of the collective term “Appellants” throughout subsequent filings was intended in good faith to reflect the overlapping interests and issues affecting both Defendants throughout the underlying proceedings and related appellate matters.

5. Appellant respectfully submits that amendment of the Notice of Appeal will promote clarity of the appellate record and avoid procedural confusion concerning the parties participating in the appeal.
6. Appellant respectfully submits that Respondent will not be prejudiced by clarification of the appellate caption and participating appellants, as Michelle Lindsay has been a named Defendant throughout the underlying proceedings and referenced throughout the related appellate filings.

WHEREFORE, Appellant respectfully requests that the Court permit amendment of the Notice of Appeal to reflect Michelle Lindsay as an additional Appellant and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Shaun Lindsay

Shaun Lindsay
Pro Se Appellant
Service-Connected Disabled Veteran
101 Rainbow Drive #14938
Livingston, Texas 77399
shaun@shaunlindsay.com

Date: May 14, 2026



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The South Carolina Court of Appeals

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May 14, 2026

Shaun Lindsay
101 Rainbow Drive #14938
Livingston TX 77399

Re: Complete Heat and Air, LLC v. Shaun Lindsay
Appellate Case No. 2026-001025

Dear Mr. Lindsay:

We received your email correspondence dated April 29, 2026, regarding the participants in this appeal. The notice of appeal indicates only one appellant challenging the orders on appeal. If you wish to amend the notice of appeal to reflect additional appellants, you must serve and file a motion pursuant to Rule 240 of the South Carolina Appellate Court Rules (SCACR). No further action will be taken on your email correspondence dated April 29, 2026.

Very truly yours,

Jasmine D. Smith, Deputy

CLERK

cc: David S. Wyatt, Esquire

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Amend Notice of Appeal to Reflect Additional Appellant was served upon Respondent's counsel on this 14th day of May, 2026, by United States Mail and/or electronic mail addressed as follows:

David S. Wyatt
Wyatt Law Firm, LLC
1 Whitsett Street
Greenville, South Carolina 29601

Shaun Lindsay

Shaun Lindsay
Pro Se Appellant
Service-Connected Disabled Veteran
101 Rainbow Drive #14938
Livingston, TX 77399