

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Appellate Case No.: 2026-000958

Josetta Singleton, Jayla Singleton and Tinarris Williams

Appellants,

v.

Ah4R Management-SC, LLC, as agent for AMH Development, LLC,

Respondents.

**RESPONDENT’S MOTION TO SUPPLEMENT AND CORRECT THE RECORD ON
APPEAL**

Respondent Ah4R Management-SC, LLC, as agent for AMH Development, LLC, (“Respondent”), by and through its undersigned counsel, pursuant to Rules 210 and 240 of the South Carolina Appellate Court Rules (“SCACR”), respectfully moves this Court for an Order directing that the Record on Appeal filed by Appellants on October 1, 2026, be supplemented and corrected to include the materials identified below. In support of this Motion, Respondent shows the Court as follows:

BACKGROUND

1. This appeal arises originally from an action for ejectment brought by Respondent against Appellants in the Berkeley County Magistrate Court, which resulted in the issuance of a Warrant of Ejectment dated January 26, 2026.

2. Appellants then appealed the Magistrate Court's Warrant of Ejectment to the Circuit Court in Berkeley County. The Circuit Court issued an Order Affirming the Magistrate's Court's Warrant of Ejectment. Appellant then initiated this appeal.

3. On October 1, 2026, Appellants filed the Record on Appeal with this Court. The Record includes Respondent's Application for Ejectment, but omits the exhibits attached to and filed with that Application, as well as several other filings, orders, and communications that are part of the proceedings below and of this appeal.

4. Each of the omitted materials were included in Respondent's Designation of Matter to be included in Record on Appeal filed August 26, 2026, and further provided to Appellants via email prior to the filing of the Record on Appeal, yet Appellants did not include them.

MATERIALS OMITTED FROM THE RECORD ON APPEAL

Respondent requests that the Record on Appeal be supplemented and corrected to include the following:

- (a) The exhibits to the Application for Ejectment, including: (i) the applicable lease agreement between Respondent and Appellants; (ii) the delinquency letter provided to Appellants; and (iii) the resident ledger submitted with the Application;
- (b) The Request for a Show Cause Hearing dated January 15, 2026;
- (c) The Warrant of Ejectment dated January 26, 2026;
- (d) The email correspondence confirming delivery of the transcript to this Court; and
- (e) This Court's Order dated May 1, 2026.

True and correct copies of the foregoing materials can be provided to the Court upon request.

ARGUMENT

The Record on Appeal should contain the materials necessary for this Court to fairly and fully review the issues presented. See Rule 210, SCACR. The Application for Ejectment, standing

alone without its exhibits, is incomplete. The lease, delinquency letter, and ledger are the very documents upon which the ejectment was sought and granted, and they establish the tenancy, the obligation to pay rent, the default, and the notice provided to Appellants. Without them, the Court cannot evaluate whether the underlying ejectment was proper.

Similarly, the Request for a Show Cause Hearing and the Warrant of Ejectment are core procedural documents reflecting the course of the proceedings below and the very judgment from which Appellants appeal. The transcript delivery email and this Court's May 1, 2026 Order are part of the appellate history of this matter and bear on the procedural posture of the appeal.

Because these materials were part of the proceedings below or of this appeal, were furnished to Appellants, and are necessary to a complete and accurate record, Respondent respectfully submits that supplementation and correction of the Record on Appeal is appropriate.

Respondent seeks only to complete the record with materials directly bearing on the ejectment under review and does not seek to enlarge the record with extraneous matters.^{1 2}

¹The Court's Orders filed August 21, 2026, and October 2, 2026, denied Appellants' motions dated June 30, 2026, and July 7, 2026, to supplement the record with materials relating to the June 4, 2026 Bond Orders. Notwithstanding those rulings, the Record on Appeal filed October 1, 2026, includes, among other things, a Motion to Clarify Balance, an Emergency Motion to Determine Compliance and supporting Affidavit, various ledgers and payment records, and a Resident Ledger through September 1, 2026. Respondent does not seek relief as to these materials by this Motion, as they do not bear on the propriety of the underlying ejectment, but notes their inclusion because they are contrary to the Court's prior Orders and unnecessarily enlarge the record. Respondent reserves the right to address these materials as appropriate.

²Respondent further notes that several of Appellants' filings with this Court bear certificates of service representing that the filings were mailed to undersigned counsel. Undersigned counsel has not received those filings by mail or otherwise. Respondent does not concede that proper service has been made and reserves all rights with respect to any filing not properly served. Respondent requests that future filings be properly served on Respondent's Counsel.

CONCLUSION

WHEREFORE, Respondent respectfully requests that this Court grant this Motion and issue an Order (1) supplementing and correcting the Record on Appeal to include the materials identified in Paragraph 4 above and attached hereto; (2) directing Appellants to file an amended or supplemental Record on Appeal including those materials, or, alternatively, accepting the attached materials as a supplemental record; and (3) granting such other and further relief as the Court deems just and proper.

Respondent further respectfully requests that the Court stay the deadline for the filing and service of the Respondent's Final Brief until the Court has issued an Order in response to this motion. Respondent cannot properly prepare that Final Brief until the Court determines the proper contents of the Record on Appeal and instructs Appellants accordingly.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

By: /s/ Mark B. Goddard

Mark B. Goddard, SC Bar No. 73965

R. Hawthorne Barrett, SC Bar No. 16973

P.O. Box 1473

Columbia, SC 29202

(803) 227-4334

mgoddard@turnerpadget.com

tbarrett@turnerpadget.com

Attorneys for Respondent

Date: October 8, 2026

RECEIVED

Oct 08 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Appellate Case No.: 2026-000958

Josetta Singleton, Jayla Singleton and Tinarris Williams

Appellants,

v.

Ah4R Management-SC, LLC, as agent for AMH Development, LLC,

Respondents.

Proof of Service of Respondents' Motion to Supplement/Correct the Record on Appeal

I, the undersigned as counsel for Respondent, do hereby certify that on October 8, 2026, I caused a true and correct copy of the foregoing Respondent's Motion to Supplement and Correct the Record on Appeal, together with its exhibits, to be served upon Appellants by email and by personally depositing in a United States Mail, postage prepaid addressed as indicated below:

Josetta Singleton
129 Anthurium Drive
Summerville, SC 29486
Singletonjosetta02@gmail.com
Pro Se Appellant

Jayla Singleton
129 Anthurium Drive
Summerville, SC 29486
jalyasingleton69@gmail.com
Pro Se Appellant

Tinarris Williams
129 Anthurium Drive
Summerville, SC 29486
Emonw32@gmail.com
Pro Se Appellant

SIGNATURE PAGE TO FOLLOW

TURNER PADGET GRAHAM & LANEY, P.A.

By: /s/ Mark B. Goddard

Mark B. Goddard, SC Bar No. 73965

R. Hawthorne Barrett, SC Bar No. 16973

P.O. Box 1473

Columbia, SC 29202

(803) 227-4334

mgoddard@turnerpadget.com

tbarrett@turnerpadget.com

Attorneys for Respondent