

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
OCT 14 2026
SC Court of Appeals

APPEAL FROM THE CHARLESTON COUNTY
COURT OF COMMON PLEAS

William W. Wheeler, III, Circuit Court Judge

Circuit Court Appellate No.: 2026-CP-10-00613
Appellate Case No.: 2026-001766

IN THE MATTER OF:
JUNE KEA MEEKS, Decedent

Patricia Meeks. Appellant,

vs.

Christina Demos Wynn. Respondent.

**RESPONDENT'S RESPONSE TO APPELLANT'S MOTION
FOR LEAVE TO FILE RULE 60(b) MOTION, SCRCP**

Respondent Christina Demos Wynn contends Appellant's Motion for Leave to File Rule 60(b) Motion, SCRCP, should summarily be dismissed on the basis that Appellant failed to submit a record on appeal in the circuit court as the appellate court per S.C. Code Ann. § 62-1-308(f). As a result, the Appellant did not present the documents identified as Exhibit B and Exhibit C in the Appellant's appeal to the circuit court in its capacity as the appellant court. In the absence of such a record on appeal, the issue as related to Exhibit B and Exhibit C cannot be considered on appeal. *Bonaparte v. Floyd*, 291 S.C. 427, 444, 354 S.E.2d 40 (Ct. App. 1987).

Moreover, the Appellant did not refer to such Exhibits or arguments in her initial brief, reply brief, or at the hearing before the circuit court judge sitting as the appellate judge. "It is axiomatic that an issue cannot be raised for the first time on appeal[...]." *Wilder Corporation v. Wilke*, 330 S.C. 71, 76, 497 S.E.2d 731 (1998).

For the foregoing reasons, Respondent Christina Demos Wynn respectfully requests this Honorable Court deny the Appellant Patricia Meeks' Motion for Leave.

s/ C. MAC GIBSON, JR.

C. Mac Gibson, Jr.

P.O. Box 30242

Charleston, SC 29417

(843) 852-4646

Attorney for Respondent

Christina Demos Wynn

Charleston, South Carolina
October 9, 2026

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PROOF OF SERVICE

I do hereby certify that on October 9, 2026, I served Patricia Meeks, *pro se*, with a copy of Respondent Christina Demos Wynn's Response to Appellant's Motion for Leave to File Rule 60(b) Motion, SCRCF, via US Mail First Class, postage prepaid, to the following address:

Patricia Meeks
2466 Swallow Drive
Charleston, SC 29414

Attorney for Respondent
Christina Demos Wynn

s/ C. MAC GIBSON, JR.
C. Mac Gibson, Jr.
P.O. Box 30242
Charleston, SC 29417
(843) 852-4646

Charleston, South Carolina
October 9, 2026

C. MAC GIBSON, JR.
Attorney at Law
P.O. Box 30242
Charleston, South Carolina 29417

Telephone: (843) 852-4646

Email: mac@cmacgibson.net

October 9, 2026

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
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SC Court of Appeals

Re: Patricia Meeks v. Christina Demos Wynn
Appeal from Charleston County Court of Common Pleas
Appellate Case No.: 2026-001766

Dear Mrs. Kitchings:

Enclosed for filing, please find an original and a copy of Respondent Christina Demos Wynn's Response to Appellant's Motion for Leave to File Rule 60(b) Motion, SCRCF and Proof of Service.

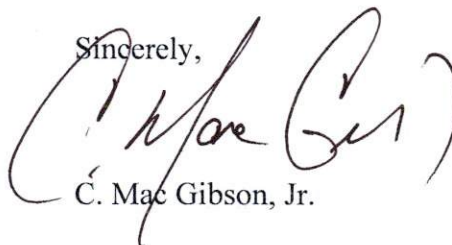
I would appreciate it if you would file the referenced documents and return a stamp filed copy of Respondent Christina Demos Wynn's Response to Appellant's Motion for Leave to File Rule 60(b) Motion, SCRCF and Proof of Service to me in the enclosed stamped self addressed envelope.

By a copy of this letter, I am sending a copy of the referenced documents to Appellant Patricia Meeks.

If you have any questions concerning this matter, then please call me.

With kind regards, I am

Sincerely,



C. Mac Gibson, Jr.

Enclosures (as stated)

cc: Christina Demos Wynn, Esquire (via email)

Ms. Patricia Meeks (w/ encls.)

C. Mac Gibson, Jr.
Attorney at Law
P.O. Box 30242
Charleston, SC 29417

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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