

FORM 14
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
2025-001843

APPEAL FROM YORK COUNTY
Court of Common Pleas

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

Case No. 2025-CP-46-01222

Brenda Burris, Respondent,

v.

Tonya R.Blake

Personal Representative of the Estate of Reco Miller, Appellant.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

Pursuant to rule 209, SCACR, the Appellant, Tonya R. Blake, Personal Representative of the Estate of Reco Miller, designates the following matter for review:

The Appellant appeals from the order or judgment of the York County Court of Common Pleas entered on [August 14, 2025], in which the Respondent was granted a motion to dismiss the wrongful death lawsuit. The issues to be raised on appeal include:

1. Whether the circuit court erred in determining that the Respondent didn't know she didn't have smoke detectors because Appellant's counsel then, Attorney Grooms, failed to tell the lower court about the text message in which the Respondent, Brenda Burris, tells Appellant she is going to get the smoke detector and didn't install them. Grooms mentions he is aware that there were texts in the transcript but never got the Subpoena for text messages from T-Mobile, where the record reflects that the Appellant occupied the property beginning October 1, 2019, and whether that determination was erroneous

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under the applicable provisions of South Carolina law, including any applicable landlord-tenant, premises-liability, or negligence principles identified in the appealed order.

2. Whether the circuit court erred as a matter of law by failing to consider, or by assigning no legally sufficient weight to, the Appellant's written request dated August 30, 2020, and the related text messages requesting smoke detectors and fire alarms, and whether the court's treatment of evidence was contrary to the applicable South Carolina law governing notice, duty breach, causation, and the sufficiency of evidence supporting the appealed ruling.

3. Whether the circuit court's challenged findings of fact are supported by the testimony and exhibits admitted or proffered at the hearing or trial, and whether its conclusions of law correctly applied the governing South Carolina authorities to the evidence concerning the Appellants' occupancy beginning October 1, 2019, the August 30, 2020 written request, the related text messages, and the request for smoke detectors and fire alarms

The Appellant designates the following portions of the record pursuant to Rule 209(b), SCACR

1. The pleadings and other papers filed in the circuit court that are relevant to the issues on appeal

2. The order of judgment from which the appeal is taken and any order or ruling incorporated therein.

3. Any motions, responses, memoranda, objections, and rulings relevant to the issues on appeal

4. The evidence and documentation concerning the Appellant's occupancy of the property beginning October 1, 2019.

5. The written request made on August 30, 2020, and related text messages concerning requests for smoke detectors and fire alarms.

6. The Transcript of the hearing or trial at which the challenged rulings were made, including. All testimony, exhibits, objections, and rulings relevant to the issues on appeal.

7. Any exhibits admitted or proffered at the hearing or trial that are relevant to the issues on appeal

8. Any other portions of the record necessary for a complete and fair presentation of the issues on appeal.

The Appellant will serve this designation on all parties and file with the clerk of court within ten days after service of notice of appeal as required by Rule 209(a) SCACR. The Appellant will make satisfactory arrangements with the court reporter for preparation of the transcript and will serve and file any required transcript designation and statements of issues within the time prescribed by Rule 209, SCACR. The Appellant understands that the record on appeal will be prepared and transmitted in accordance with the South Carolina Appellate Court Rules and that the Appellant bears responsibility for designating the portions of transcript and record necessary for appellate review.

I certify that this designation contains no matter which is irrelevant to this appeal.

October 20, 2026/s/ Tonya R. Blake

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

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The 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

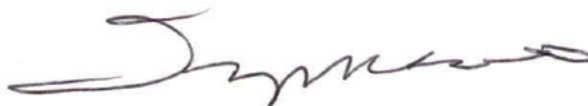
Appellant.

PROOF OF SERVICE

In response to the court order dated October 14, 2026, I certify that I have served the designation of matter and my initial brief by depositing a copy of it in the United States Mail, postage prepaid, on October 20, 2026, addressed to the South Carolina Court of Appeals, 1220 Senate Street, Columbia, S.C. 29201.

October 20, 2026

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



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Untitled page

FORM 1

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY

Court of Common Pleas

G.D. Morgan Jr., Circuit Court Judge

Case No. 2025-CP-46-01222

Brenda Burris, Landlord of 821 Blackmon Street

Respondent,

V.

Tonya R. Blake, Individually and as Personal Representative.

Appellant

of the Estate of Reco Miller

NOTICE OF APPEAL

Tonya R. Blake appeals the order of the Honorable G.D. Morgan Jr. dated August 12, 2025. Appellant received written notice of this order on August 13, 2025.

September 9, 2025

I, Tonya R. Blake, appeal this action, see exhibit (A), because of ineffective counsel, and it is not factual. I stayed at 821 Blackmon Street for 2 1/2 years, not several years. See exhibit (B). Check paid to Brenda Burris. The smoke alarms were not present at the home when I moved in in October 2019. I asked Brenda repeatedly over and over to install detectors because my husband and I couldn't climb high due to health problems. On August 30, 2020 I gave Brenda Burris a letter asking her for smoke detectors at Jim & Nick's at a dinner see exhibit (C). Exhibit (D) picture of Brenda Burris, her sister Judy Minter, and me at Jim & Nick's. Brenda always said she would install the smoke detectors, but never did. Brenda texted my phone stating she was going to bring fire alarms, but she told the courts she never knew she didn't have the fire alarms at 821 Blackmon Street. This is why I am asking for the text messages from T-Mobile see exhibit (E) the subpoena and (F) letter from T-Mobile. The text messages will prove Brenda did know 821 Blackmon did not have smoke detectors, along with the letter written to Brenda on August 30, 2020, exhibit (C). Who moved the smoke detectors out? Brenda was the only one who had access to her property. I wasn't a Section 8 Recipient, so

there was no one to check behind Brenda, who allowed my disabled husband ,son, and me to move into a home with dangerous levels of black mold and rats. See exhibit(G), black mold report, and (H), Brenda admits to knowing about rats in a text message and has done nothing . Exhibit (I) items purchased by me for rat problems. She never installed smoke alarms. This is why I wasn't able to save my husband during the fire at 821 Blackmon Street on April 26,2022. When I woke up the bed was on fire . The only thing I could see was the bottom of the bed . The fire had gone on for too long. There was nothing to alert me that the fire was occurring. All the above violate the Landlord-Tenant Act.

I hired Lawyer Taylor Grooms in 2023. I told him all the above in the first paragraph, which I just explained to you all. He said okay, and he would represent me.Lawyer Grooms stated he was going to tell the judge that I repeatedly asked Brenda for smoke detectors at the Motion to Dismiss hearing, but he said nothing about none of that. Lawyer Grooms did not defend me at all, telling me my letter to Brenda, see exhibit (D), had to be an email the day before the hearing, and told me I was'nt allowed to speak at the hearing. I asked Lawyer Grooms to get a subpoena for T-Mobile for phone records before the hearing, see responses in exhibits (J) and (K). Lawyer Grooms went into the courtroom at the Motion to Dismiss hearing, calling himself a dead horse, see meaning exhibit(L) to Honorable Judge Morgan when he approached the judge. I was there, saw and heard everything. See court transcript on Motion to Dismiss Hearing August 12,2025 . I asked for a transcript copy on August 28,2025, and sent another email to the courts asking for it again, but I haven't received a copy of the transcript yet. See exhibits (M)and (N). Lawyer Grooms drops the case after the hearing, see exhibit (O) and comes back and ask me for 250 dollars to write my appeal. See exhibit (P). Knowing he didn't represent me like he should have, and admitted he was a dead horse. Why would I pay him anything to write an appeal after leaving me holding the bag? All the above facts and documentation I just stated and presented are reasons why I am asking this court to grant an appeal due to the fact that counsel was ineffective.

S/Tonya R. Blake

Tonya Blake

201 Sidney Street

Rock Hill, South Carolina 29730

(803)371-3324

Pro-se Litigant

Other Counsel of Record

Santino U.Ambrosini

P.O. Box 6648

Columbia,South Carolina 29260

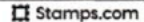
Attorney for Respondent

(803)-782-4100



Proof of tracking
to Brenda Burr Attorney

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