

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM 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

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OCT 22 2026

SC Court of Appeals

IN THE MATTER OF:
JUNE KEA MEEKS, Decedent
Patricia C. Meeks,
v.
Christina Wynn,

Appellant,

Respondent.

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

Appellant Patricia C. Meeks respectfully submits this Reply to Respondent's Response.

Respondent's Response misconstrues the relief requested in Appellant's Motion.

Appellant does not ask this Court to consider Exhibits B and C as additional evidence in deciding the merits of the pending appeal, nor does Appellant seek through this Motion to enlarge the Record on Appeal.

Rather, Appellant seeks the leave expressly required by Rule 60(b), SCRCP, to present a Rule 60(b) motion to the lower court while this appeal remains pending. Rule 60(b) provides that, during the pendency of an appeal, leave to make the motion must be obtained from the appellate court.

Respondent's contention that Exhibits B and C were not included in the record before the Circuit Court does not resolve the question presently before this Court. Those exhibits were submitted in support of Appellant's request for leave; they were not offered as additions to the appellate record for adjudication of the merits of this appeal.

Rule 240(c)(3), SCACR, specifically contemplates circumstances in which facts relied upon in support of an appellate motion are not contained in the Record on Appeal or Appendix. In that circumstance, the Rule provides for the filing of affidavits and other documents in support of the parties' positions.

Respondent's authorities concerning preservation of issues for appellate review therefore address a different question. Appellant does not seek to raise Exhibits B and C for the first time as grounds for reversal by this Court. Appellant seeks permission to present the Rule 60(b) issues to the lower court in the manner contemplated by Rule 60(b), SCRCRCP.

Rule 60(b), SCRCRCP, expressly authorizes relief from a final judgment, order, or proceeding on specified grounds and expressly recognizes that, while an appeal is pending, appellate leave is required before such a motion may be made below. The merits, timeliness, and evidentiary significance of Appellant's proposed Rule 60(b) grounds are matters for the Circuit Court to address in the first instance if leave is granted; they are not resolved by Respondent's appellate-record preservation argument.

WHEREFORE, Appellant respectfully requests that the Court reject Respondent's request to deny the Motion and grant Appellant leave to file her Rule 60(b) motion in the Circuit Court, together with the other relief requested in Appellant's Motion.

Respectfully submitted,
s/ Patricia C. Meeks
Patricia C. Meeks, Appellant, self-represented
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Telephone: 843-607-2175
Email: meekspatriciaac@gmail.com
October 19, 2026
Charleston, South Carolina

CERTIFICATE OF SERVICE

I certify that on October 19, 2026, I served a true and correct copy of the foregoing
Appellant's Reply to Respondent's Response to Appellant's Motion for Leave to File Rule 60(b)
Motion, SCRCF, by United States Mail, first-class postage prepaid, addressed as follows:

C. Mac Gibson, Jr., Esquire
Attorney for Respondent Christina Demos Wynn
P.O. Box 30242
Charleston, South Carolina 29417

s/ Patricia C. Meeks
Patricia C. Meeks

CERTIFICATE OF SERVICE

I certify that on October 19, 2026, I served a true and correct copy of the foregoing
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C. Mac Gibson, Jr., Esquire
Attorney for Respondent Christina Demos Wynn
P.O. Box 30242
Charleston, South Carolina 29417

s/ Patricia C. Meeks
Patricia C. Meeks

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The Honorable Jerry A. Kitchings - Clerk

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