

**FORM 1  
NOTICE OF AMENDED APPEAL IN A CIVIL CASE**

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

**APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas**

**Letitia H. Verdin, Circuit Court Judge**

**Case No. 2018-CP-23-02230**

**ROLLIE BRIAN ROBERTS,  
KIMBER FLYNN ROBERTS,**

**Appellants,**

**v.**

**R.T.G. FURNITURE  
CORPORATION, RTG  
FURNITURE CORPORATION OF  
GEORGIA, RTG  
FURNITURE CORPORATION OF  
TEXAS, RTG  
FURNITURE OF TEXAS, L.P.,  
ROOMSTOGO.COM, INC., SE  
INDEPENDENT  
DELIVERY SERVICES, INC.,**

**Respondents.**

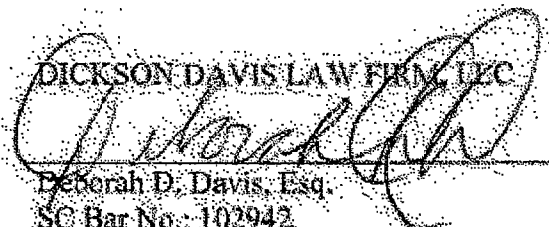
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FEB 06 2019  
SC Court of Appeals**

**NOTICE OF AMENDED APPEAL**

Appellants **ROLLIE BRIAN ROBERTS** and **KIMBER FLYNN ROBERTS** appeals the order of the Honorable Letitia H. Verdin dated January 15, 2019, with respect to the court's denial of Appellants' Motion to Amend or Alter Appellants' Complaint filed before the Greenville County Circuit Court on August 29, 2018. Respondents received written notice of entry of this order via electronically on January 17, 2019.

Respectfully submitted this 6 day of February, 2019

DICKSON DAVIS LAW FIRM, LLC



Deborah D. Davis, Esq.  
SC Bar No.: 102942  
439 Congaree Street, Mailbox 6  
Greenville, SC 29607  
(864) 729-5424  
(864) 752-1424  
d.davis@dicksondavislaw.com  
www.dicksondavislaw.com

ATTORNEY FOR APPELLANTS

Other Counsel of Record:  
Turner Padgett Graham and Lancy, P.A.  
Frank S. Stern, Esq.  
200 East Broad Street, Suite 250  
P.O. Box 1509  
Greenville, SC 29601  
(864) 552-4636

ATTORNEY FOR THE RESPONDENTS

**FORM 9  
LETTER TO CLERK OF LOWER COURT  
FILING NOTICE OF AMENDED APPEAL**

February 6, 2019

The Honorable Paul B. Wickensimer  
Clerk of Court for Greenville County  
Court of Common Pleas  
305 E. North St. # 318  
Greenville, SC 29601

RE: Roberts et al., Appellants, v. RTG Furniture Corporation et al.,  
Respondents, Case No. 2018-CP-23-02230

Dear Honorable Wickensimer:

Enclosed for filing is a notice of amended appeal in the above case. I received notice from the South Carolina Appellate Court on January 25, 2019, to file an amended notice of appeal prior to the appeal being dismissed on January 30, 2019. This filing is to remain in compliance with the South Carolina Appellate Court's directions prior to the dismissal of the appeal, which I can petition to reinstate the appeal.

Respectfully submitted this 6 day of February, 2019

DICKSON DAVIS LAW FIRM, LLC



Deborah D. Davis, Esq.  
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ATTORNEY FOR APPELLANTS

cc: Turner Padgett Graham and Laney, P.A.  
Frank S. Stern, Esq.  
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Greenville, SC 29601  
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ATTORNEY FOR THE RESPONDENTS.

ELECTRONICALLY FILED - 2019 Feb 06 11:36 AM - GREENVILLE - COMMON PLEAS - CASE#2018CP2302230

**FORM 7  
PROOF OF SERVICE OF A NOTICE OF AMENDED APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Case No. 2018-CP-23-02230

ROLLIE BRIAN ROBERTS,  
KIMBER FLYNN ROBERTS,

Appellants,

v.

R.T.G. FURNITURE  
CORPORATION, RTG  
FURNITURE CORPORATION OF  
GEORGIA, RTG  
FURNITURE CORPORATION OF  
TEXAS, RTG  
FURNITURE OF TEXAS, L.P.,  
ROOMSTOGO.COM, INC., SE  
INDEPENDENT  
DELIVERY SERVICES, INC.,

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SC Court of Appeals

Respondents.

**PROOF OF SERVICE**

I certify that I have served the Notice of Amended Appeal on Respondents **R.T.G. FURNITURE CORPORATION ET AL.** electronically and by depositing a copy of it in the United States Mail, postage prepaid, on February 6, 2019, addressed to the attorney of record, to the following address(es):

R.T.G Furniture Corp. et al.

c/o Frank S. Stern, Esq.  
Turner Padgett Graham and Laney P.A.  
200 East Broad Street, Suite 250  
P.O. Box 1509  
Greenville, SC 29602

Respectfully submitted this 6 day of February, 2019.

DICKSON DAVIS LAW FIRM, LLC

/s/ Deborah D. Davis, Esq.  
 Deborah D. Davis, Esq.  
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 439 Congaree Street, Mailbox 6  
 Greenville, SC 29607  
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 d.davis@dicksondavislaw.com  
 www.dicksondavislaw.com

ATTORNEY FOR APPELLANTS



DICKSON DAVIS LAW FIRM

**NOTICE OF AMENDED APPEAL COVER LETTER**

February 6, 2019

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FEB 06 2019

SC Court of Appeals

Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
P.O. Box 11629  
Columbia, SC 29211

**VIA E-FILE**

Re : *Roberts et al. v. RTG Furniture Corporation et al.*  
Case No. : 2018-CP-23-02230  
File Id. : 2017-01-122

Dear Clerk of Court:

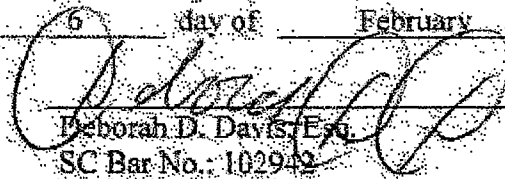
As you know, I represent Appellants in this matter. Included is the Notice of Amended Appeal pertaining to the court order issued by the Honorable Letitia H. Verdin on January 15, 2019, denying Appellants' Motion to Amend or Alter Appellants' Complaint filed before the Greenville Circuit Court on August 29, 2018. I received notice from the South Carolina Appellate Court on January 25, 2019, to file an amended notice of appeal prior to the appeal being dismissed on January 30, 2019. This filing is to remain in compliance with the South Carolina Appellate Court's directions prior to the dismissal of the appeal, which I can petition to reinstate the appeal. Included is the following:

- (1) Notice of Amended Appeal;
- (2) Proof of Service of Notice of Amended Appeal;
- (3) Letter to Clerk of Lower Court for Notice of Amended Appeal in Greenville County Circuit Court;
- (4) Previously filed Letter Ordering Transcript from Court Reporter Teresa B. Johnson;
- (5) Order Denying Plaintiffs' Motion to Amend Plaintiff's Complaint; and,
- (6) Order Denying Plaintiffs' Motion to Alter or Amend Judgment.

A separate filing for a Motion to Reinstate the Appeal to the South Carolina Appellate Court for an Order issued by South Carolina Appellate Court on January 30, 2019, is forthcoming.

Respectfully submitted this

6 day of February, 2019

  
Deborah D. Davis, Esq.  
SC Bar No.: 102942  
Attorney for Appellants

cc: Frank S. Stern, Greenville County Clerk of Court  
/ddd

# FAX COVER SHEET

<b>TO</b>	Amelia
<b>COMPANY</b>	S.C. Appellate Clerk of Court
<b>FAX NUMBER</b>	18037341839
<b>FROM</b>	Deborah Davis
<b>DATE</b>	2019-02-06 19:02:36 GMT
<b>RE</b>	Appellate Case No. 2019-000104

## COVER MESSAGE

Amelia,

Please see the required amended notice of appeal to comply with timely filing. The motion to reinstate the appeal is forthcoming.

Best Regards,

Deborah D. Davis, Esq.  
Attorney at Law

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439 Congaree Road  
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Greenville, SC 29607  
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864.752.1424 fax  
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