

91031

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Thomas E. Player, Jr., Special Referee
Case No. 2013-CP-43-153
Appellate Case No. 2018-001277

RECEIVED
OCT 08 2019
SC Court of Appeals

Donna Erickson,

Respondent,

v.

Felicia Ruff,

Appellant.

RESPONDENT'S RENEWED MOTION TO DISMISS APPEAL AND FOR
SANCTIONS

Respondent Donna Erickson respectfully renews her motion for an Order dismissing the appeal of Appellant Felicia Ruff, with prejudice, pursuant to Rule 260(a), SCACR. In addition, Respondent requests that sanctions be assessed against Appellant pursuant to Rule 269, SCACR. The grounds for this motion are set forth herein.¹

The litigation between the parties has been ongoing since 2013. This purported appeal was filed over one year ago, and Appellant has repeatedly failed to comply with the Rules of Appellate Practice. Rule 260(a), SCACR provides that “[w]henver it appears that an appellant or petitioner

¹ The subsequent events not covered in the original motion are contained on pages 3-6, *infra*.

has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court.” (emphasis added). In addition, Rule 269, SCACR, states:

Where an appeal, petition, motion or return is frivolous or taken solely for the purposes of delay, or *is not in compliance with these Rules*, the appellate court may upon its own motion or that of a party, after ten (10) days notice, impose upon offending attorneys *or parties* such sanctions as the circumstances of the case and discouragement of like conduct in the future may require.

Id. (emphasis added). This Court has noted that:

[T]he South Carolina Appellate Court Rules are not mere technicalities but provide the parties and this Court with an orderly mechanism through which to guide appeals in this State. It is incumbent upon counsel to provide material that complies with the Rules and facilitates appellate review.

Henning v. Kaye, 307 S.C. 436, 437, 415 S.E.2d 794, 794 (1992).²

From the initiation of this appeal, Appellant has failed to comply with the rules. The notice of Appeal, filed July 9, 2018, was deficient in that, as the Court noted in its first deficiency letter, Appellant failed to submit the \$100.00 filing fee, failed to include a proof of service, and failed to include proof that the notice had been filed with the lower court (Exhibit 1). On July 20, 2018, this Court sent a second deficiency notice to Appellant regarding her continued failure to pay the filing fee (Exhibit 2). Appellant also failed to notify the Court within the required ten days whether she had ordered the transcript or submit a certification that no transcript was needed, and only provided such letter after the Court issued a deficiency letter (Exhibit 3).

² While the Appellant here is appearing *pro se*, unlike the party in the Henning case, she has been afforded multiple opportunities to comply with the rules and has failed to do so. Also, it has been more than one year since Appellant filed the Notice of Appeal and she has had ample opportunity to secure counsel but has opted not to do so.

On July 30, 2018, Appellant filed a purported motion for extension of time in which to file her brief. However, again, the motion had multiple deficiencies, including failure to include proof of service, failure to provide grounds for the motion, and failure to sign the motion (Exhibit 4).

On September 19, 2018 – more than two months after the filing of the notice of appeal – Appellant had still not paid the filing fee, which had been requested by the Clerk’s office on at least three occasions (Exhibit 5). At one point, the appeal was dismissed and Appellant sought to reinstate her appeal, but failed to submit the required filing fee for the motion (Exhibit 6). On December 12, 2018 – five months after the purported appeal was filed – this Court issued an order reinstating the appeal and ordered Appellant to submit her brief and designations, in compliance with the South Carolina Appellate Court Rules, within thirty days (Exhibit 7).

Since that time, Appellant has attempted four different times to submit an initial brief and designation of record. None of the briefs submitted by Appellant have met the requirements of Rule 208, SCACR, and after the first three purported filings, the Court has issued deficiency letters (collectively, Exhibit 8). The Court last sent a deficiency letter (dated May 22, 2019) stating that the Appellant’s Initial Brief had not been signed and that if the deficiency was not been cured within ten days, the appeal would be dismissed. As of the date of Respondent’s initial Motion to Dismiss (June 12, 2019), Respondent had not received a corrected brief. However, it appears that on May 31, 2019, Appellant filed a signed Initial Brief (Exhibit 9). This Initial Brief still fails to meet the requirements of Rule 208, SCACR. In addition, Appellant did not serve the brief on Respondent and failed to include a certificate of service showing service (or attempted service) on Respondent.³ Thus, this appeal should be dismissed, with prejudice and without right to seek

³ Of course, service and proof thereof are required by Rule 208(a)(1), SCACR.

reinstatement. Appellant has had multiple opportunities to perfect her appeal and has been warned of the need to comply with the Rules of Appellate Court but has completely failed to do so.

In addition to failing to serve the signed Initial Brief on Respondent, the May 31, 2019 Initial Brief still completely fails to comply with the requirements of Rule 208, SCACR, as described below:

- Appellant’s Initial Brief fails to include a proper Table of Authorities (Rule 208(b)(1)(A)). Appellant has amended the prior version of the brief by listing several Restatements with the notation “The authorities cited are fictitious and intended to show the form of citation only.” These citations and the notation are copied directly from the sample brief in Appendix C, Form 13 to the South Carolina Rules of Appellate Procedure.
- The Standard of Review portion of Appellant’s Initial Brief fails to include “the applicable standard of review with citations to relevant case law establishing the standard.” (Rule 208(b)(1)(D));
- Appellant’s Initial Brief does not contain an Argument section, as described by Rule 208(b)(1)(E):

The brief shall be divided into as many parts as there are issues to be argued. At the head of each part, the particular issue to be addressed shall be set forth in distinctive type, followed by discussion and citations of authority. A party may also include a separate statement of facts relevant to the issues presented for review, with reference to the record on appeal, which may include contested matters and summarize the party's contentions.

Appellant’s Initial Brief included headings in the Argument section but those headings were repeated verbatim from the headings in the sample brief included as Form 13 in the South

Carolina Rules of Appellate Procedure.⁴ Those headings have absolutely no relation to this case. Appellant has failed to include an actual argument of any kind below those headings and she has failed to cite to any authority or to the record on appeal. In Lawson v. Mills, the court dismissed an appeal for similar deficiencies, stating:

Appellant's exceptions and brief were obviously prepared with virtually no regard for the rules of this Court. Not one of his exceptions clearly or fully complies with Supreme Court Rule 4, sec. 6. His brief does not fully comply with Supreme Court Rule 8, Sec. 2, and totally disregards Rule 8, Sec. 3. The appeal is, accordingly, dismissed for failure to comply with the rules of this Court.

Lawson v. Mills, 259 S.C. 308, 309, 191 S.E.2d 637, 637 (1972)(decided under a prior, but similar, set of rules before the creation of the South Carolina Court of Appeals).

Because Appellant has completely and repeatedly disregarded the South Carolina Rules of Appellate Procedure, this appeal should be dismissed with prejudice and without leave to petition for reinstatement. While Rule 260, SCACR, is silent on whether a case should be dismissed with or without prejudice, Rule 269 allows this Court to impose sanctions on a party for noncompliance with the rules. The sanctions may include those that the “circumstances of the case and discouragement of like conduct in the future may require.” Rule 269, SCACR. It has been over one year since Appellant attempted to appeal this matter and she has failed to comply with the Rules at almost every instance. There have been at least nine letters from this Court outlining the deficiencies of Appellant’s filings. Even in supposedly trying to correct the most recent deficiency, Appellant has failed in that she did not serve the May 31, 2019 Initial Brief on Respondent and the brief completely fails to meet the standards of Rule 208, SCACR. Appellant also failed to respond

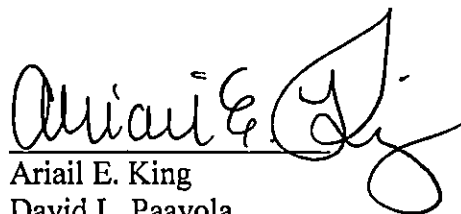
⁴ Similarly, the Statement of the Issues on Appeal are not the issue in this case but are repeated verbatim from the sample brief in the South Carolina Rules of Appellate Procedure.

to Respondent's original Motion to Dismiss Appeal and for Sanctions filed on June 12, 2019. Rule 240(e), SCACR states that "[a]ny party opposing a motion or petition shall have ten days from the date of service thereof to file an original and six (6) copies of his return with the clerk and serve on all parties a copy of the return...**Failure of a party to timely file a return may be deemed a consent by that party to the relief sought in the motion or petition.**" (emphasis added)

Respondent submits that these actions support sanctions of dismissal with prejudice and without leave for reinstatement. In addition, Respondent requests that Appellant be sanctioned \$550.00, to be paid to Respondent as reimbursement for the attorneys' fees and costs incurred in filing the June 12, 2019 motion and \$300.00 incurred in filing this renewed motion to dismiss.

CONCLUSION

Respondent Donna Erickson respectfully renews her request for dismissal of the appeal of Appellant Felicia Ruff, with prejudice and without leave to petition for reinstatement. Respondent further requests that this Court assess sanctions against Appellant in the amount of \$850.00 for attorneys' fees and costs incurred in filing the June 1, 2019 motion to dismiss and the instant motion, to be paid to Respondent through her counsel.



Ariail E. King
David L. Paavola
LEWIS BABCOCK L.L.P.
P.O. Box 11208
Columbia, South Carolina 29211
(803)771-8000

Attorneys for Respondent Donna Erickson

October 1, 2019



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
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July 11, 2018

Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

Upon reviewing your notice of appeal, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your appeal will be dismissed:

- The required filing fee has not been submitted. The correct filing fee is \$100.00.
- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- You must provide proof that you have filed the notice of appeal with the lower court clerk of court, as required by Rule 203, SCACR.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Joseph King Coffey, Esquire





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

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July 20, 2018

Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

The Court is in receipt of your materials, filed July 18, 2018, which we construe as your attempt to correct the notice of appeal deficiencies outlined in the Court's letter of July 11, 2018. Please be advised that the deficiencies must be corrected in their entirety before this appeal can proceed. Within ten (10) days of the date of this letter, you must provide the \$100.00 notice of appeal filing fee, or your appeal will be dismissed.

Very truly yours,

A handwritten signature in cursive script that reads "Jenny A. Kitchings".

CLERK

cc: Joseph King Coffey, Esquire





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

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July 26, 2018

Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ruff:

Our records reflect that the time for ordering the transcript has expired. Within ten (10) days of the date of this letter, you must file a copy of the letter showing that you have ordered the transcript directly from the court reporter, along with a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules. Your appeal will be dismissed if no motion is made within ten (10) days of the date of this letter.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Joseph King Coffey, Esquire





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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July 31, 2018

Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

Upon reviewing your motion for an extension, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your motion will not be considered:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- The document has not been signed as required by Rule 267(b), SCACR.
- Your motion does not comply with Rule 240(c), SCACR. Specifically, you have not stated the grounds for the motion. You must file an amended motion that specifically states what you are seeking an extension of time for, within ten days.

Very truly yours,

V. Claire Allen, Deputy
CLERK

cc: Joseph King Coffey, Esquire





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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September 19, 2018

Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

The Court is in receipt of your correspondence filed September 17, 2018, which we construe as your response to the Court's order dated August 13, 2018. Please be advised that you must submit the notice of appeal filing fee of \$100.00 and serve and file your appellant's initial brief and designation of matter that comply with Rule 208 and 209, SCACR, for content, and Rule 267, SCACR, for form of papers, within ten (10) days or your appeal will be dismissed.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Joseph King Coffey, Esquire





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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October 30, 2018

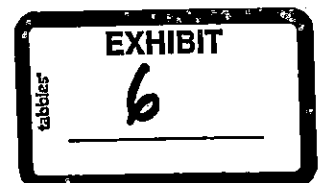
Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

Upon reviewing your correspondence received October 26, 2018, which the Court construes as a motion to reinstate the appeal, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and must be corrected in their entirety within ten (10) days of the date of this letter or the remittitur will be sent:

- The accompanying proof of service is not in compliance with the SCACR. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR. The proof of service you have provided states that you have served the "notice of appeal". You must provide proof of service for the motion you are filing.
- The required filing fee has not been submitted. The correct filing fee for a motion is \$50.00.



Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Joseph King Coffey, Esquire

The South Carolina Court of Appeals

Donna Erickson, Respondent,

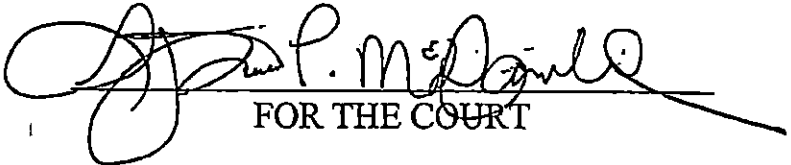
v.

Felicia Ruff, Appellant.

Appellate Case No. 2018-001277

ORDER

Appellant's petition to reinstate is granted. Within thirty days of the date of this order, Appellant shall serve and file an initial brief and designation of matter that comply with Rule 208 and Rule 209 of the South Carolina Appellate Court Rules.

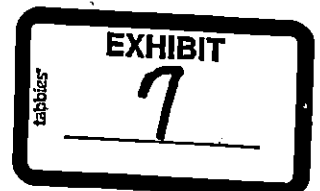

FOR THE COURT

Columbia, South Carolina

cc:
Felicia Ruff
Joseph King Coffey, Esquire

FILED

December 13, 2018





The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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February 28, 2019

Felicia Ruff
1455 Hidden Oaks Drive
Wedgefield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

Upon reviewing your appellant's initial brief, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and each deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed:

- The caption must be identical to the caption given below:

Donna Erickson, Respondent,

v.

Felicia Ruff, Appellant.

- The reference to Rule 267 at the bottom of the title page should not be part of the title page.
- Our records indicate that the judge for the order being challenged on appeal is Thomas E. Player Jr., not George E. Brown.



- Only the Court of Appeals should be listed on the top of the title page, as this case is not before the Supreme Court.
- The brief must be double spaced as required by Rule 267(c), SCACR.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Joseph King Coffey, Esquire



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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April 15, 2019

Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

We are in receipt of your appellant's initial brief, filed on March 12, 2019, which is presumed to be a response to this Court's letter dated February 28, 2019. Please be advised that the deficiencies outlined in this Court's letter of February 28 must be corrected in their entirety before this appeal can proceed. Specifically, the brief must be double spaced as required by Rule 267(c) of the South Carolina Appellate Court Rules (SCACR). Please be advised that proof of service must also be provided for the amended appellant's initial brief. You must serve and file an amended appellant's initial brief within ten (10) days from the date of this letter. This is the Court's second request for these corrections. Failure to comply with the Court's request within ten (10) days of the date of this letter will result in the dismissal of this appeal.

Very truly yours,


CLERK

cc: Joseph King Coffey, Esquire



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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May 22, 2019

Felicia Ruff
1455 Hidden Oaks Drive
Wedgefield SC 29168

Re: Donna Erickson v. Felicia Ruff
Appellate Case No. 2018-001277

Dear Ms. Ruff:

Upon reviewing your amended appellant's initial brief, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and this deficiency must be corrected within ten (10) days of the date of this letter or this appeal will be dismissed:

- The document has not been signed as required by Rule 267(b), SCACR.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Joseph King Coffey, Esquire

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Thomas E. Player, Jr., Special Referee
Case No. 2013-CP-43-153
Appellate Case No. 2018-001277

RECEIVED

JUN 12 2019

SC Court of Appeals

Donna Erickson,

Respondent,

v.

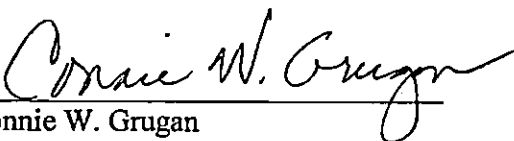
Felicia Ruff,

Appellant.

PROOF OF SERVICE

I, Connie W. Grugan, legal assistant to the law firm of Lewis Babcock L.L.P., hereby certify that I have served Respondent's Motion to Dismiss Appeal and for Sanctions upon Appellant Felicia Ruff, *pro se*, by mailing a copy of same, postage prepaid and return address clearly indicated, to the following address:

Ms. Felicia Ruff
1455 Hidden Oaks Drive
Wedgfield, South Carolina 29168



Connie W. Grugan

This 12th day of June, 2019

FORM 13

BRIEF OF APPELLANT*

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM SUMTER COUNTY

Court of Common Pleas

RECEIVED
MAY 31 2019
SC Court of Appeals

THE HONORABLE THOMAS E. PLAYER Jr.

Case No. 2018-001277

Donna Erickson

Respondent,

v.

Felicia Ruff

Appellant.



[INITIAL] BRIEF OF APPELLANT

Felicia Ruff

1455 Hidden Oaks Drive

Wedgfield, South Carolina 29168

(803) 468-5364

Appellant

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2. BECAUSE FRAUD MUST BE PROVED BY CLEAR AND CONVINCING EVIDENCE, THE COURT ERRED WHEN IT CHARGED THE JURY THAT THE RESPONDENT MUST PROVE FRAUD BY A PREPONDERANCE OF THE EVIDENCE.....2

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*The authorities cited are fictitious and intended to show the form of citation only.

Conclusion2

STATEMENT OF ISSUES ON APPEAL

1. DID THE TRIAL COURT ERR IN FAILING TO FIND THIS ACTION IS BARRED BY RES JUDICATA?
2. DID THE TRIAL COURT ERR IN CHARGING THE JURY THAT FRAUD MUST BE PROVED BY A PREPONDERANCE OF THE EVIDENCE?

STATEMENT OF THE CASE

On May 22, 2018, Donna Erickson, via legal representative, Joseph K. Coffey, brought this action of foreclosure against me, Felicia D. Ruff. The case was heard and a decision was made in favor of Donna Erickson. I was not present at the hearing. I had no knowledge of the hearing. There were alleged attempts to contact me. Yet, I was never notified. The decision resulted in the property at 1455 Hidden Oaks Drive, be foreclosed on. I am filing an appeal because, the property in question, has been paid for. The agreed upon \$18,000.00 asking price has been

met. So, I ask; How can a property that has been paid for, be foreclosed on? Fraud?

Prior to Donna Erickson bringing this hearing of Foreclosure against me, I had made attempts of my own to communicate with Donna, in hopes of arranging a closing. To no avail. I received no correspondence from Donna Erickson. Not able to do any more than that, for lack of contact information (with the exception of her mailing address), I was left in limbo. Fast forward to a couple of years later, and there's this hearing held in my absence, granting paid for property, to someone who, technically, doesn't own the property anymore. Donna Erickson's refusal to correspond with me in order to arrange a closing. In 2013, I had to file bankruptcy to save my home. In doing so, I have been led to strongly believe, Donna Erickson, has been left with the impression that my filing for Bankruptcy, voided the equity already paid in to the property. I recall having a conversation with her own (Donna Erickson) legal representation about this exact instance. He, Joseph K. Coffey, agreed (equity paid into the home still stands). With this all of this, still a case of Foreclosure was brought against me. My strong faith in the Justice system, has prompted to me to file this appeal. For I am convinced that had The Honorable Thomas E. Player, had known that this property was already paid for, and there had been disregarded attempts made (by the buyer of said property 1455 Hidden Oaks Dr.) to arrange a closing, He, The Honorable Thomas E. Player, would not have

decided in the way He did. I believe the lack of information that should have been provided to Him (Thomas E. Player) by Donna Erickson and/or her legal representation, regarding the property agreed upon buying/selling price being met, resulted in a wrong decision.

STANDARD OF REVIEW

I, Felicia Ruff, am no lawyer. I lack the legal jargon and conversation required and or expected in such legal documents. However, what I do know is, there are no citations, codes, or statutes, to confirm or validate, words from the heart. I, Felicia Ruff, am fighting for a home that I have paid for. My requests to Donna Erickson for correspondence to arrange a closing, have been disregarded. I have been robbed of my right to home ownership. I am at the mercy of The South Carolina Court of Appeals, to remand this case back to the lower courts.

FACTS

The facts are as follows;

A contract, for the purchase of 1455 Hidden Oaks Dr., was entered into on November of 2010, between Donna Erickson, and, Felicia Ruff. The buying/selling price of \$18,000.00 was agreed upon. The \$18,000.00 has been met. The legal and required need for a closing has not been conducted. This is the result of the seller, Donna Erickson, disregarding the buyer's (Felicia Ruff) attempt to communicate this fact. Rights are being violated. My right to be heard, my right to own what I have worked so hard to pay for, has been stripped of me. I believe, facts, not heard by The Honorable Thomas E. Player, evidence not presented to The Honorable Thomas E. Player, would change the outcome of this case.

1

ARGUMENTS

- I. BECAUSE RESPONDENT COULD HAVE RAISED FRAUD IN HIS PRIOR BREACH OF CONTRACT SUIT AGAINST APPELLANT, HE IS BARRED BY RES JUDICATA FROM BRINGING THIS SUIT.

[I, Felicia Ruff, do not possess the knowledge of citations of authority.]

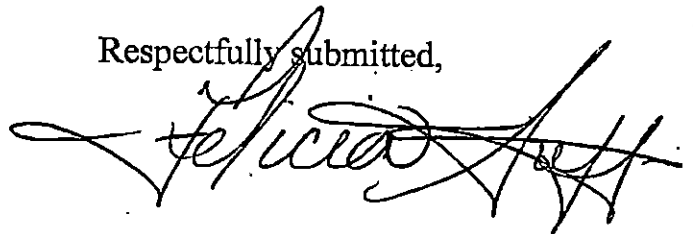
II. BECAUSE FRAUD MUST BE PROVED BY CLEAR AND CONVINCING EVIDENCE, THE TRIAL COURT ERRED WHEN IT CHARGED THE JURY THAT THE RESPONDENT MUST PROVE FRAUD BY A PREPONDERANCE OF THE EVIDENCE.

[I, Felicia Ruff, do not possess the knowledge of citations of authority.]

CONCLUSION

For the reasons stated, this Court should reverse the judgment of the circuit court.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Felicia D. Ruff", written in a cursive style.

April 25, 2019

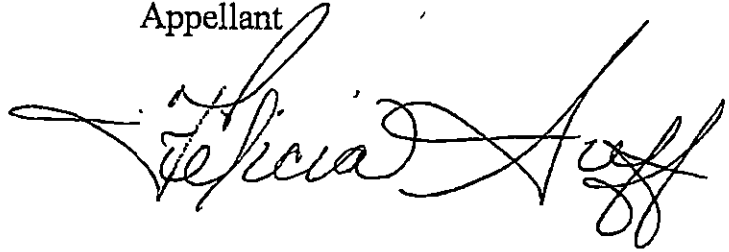
Felicia D. Ruff

A second handwritten signature in black ink, identical to the one above, appearing to read "Felicia D. Ruff".

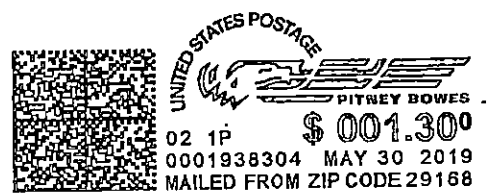
Wedgefield, South Carolina 29168

(803) 468-5364

Appellant

A handwritten signature in black ink, appearing to read "Felicia Huff". The signature is written in a cursive style with a large, sweeping initial "F" and a long, trailing flourish at the end.

1111 Can Drive
Dodgefield, SC 29168



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MAY 31 2019
SC Court of Appeals

South Carolina Court Of Appeals
Jenny Abbott Kitchings, Clerk
Post Office Box 11629
Columbia, South Carolina 29211

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Thomas E. Player, Jr., Special Referee
Case No. 2013-CP-43-153
Appellate Case No. 2018-001277

Donna Erickson,

Respondent,

v.

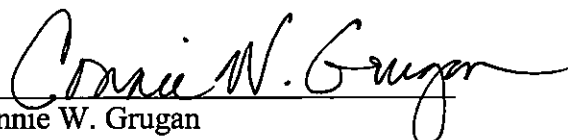
Felicia Ruff,

Appellant.

PROOF OF SERVICE

I, Connie W. Grugan, legal assistant to the law firm of Lewis Babcock L.L.P., hereby certify that I have served Respondent's Renewed Motion to Dismiss Appeal and for Sanctions upon Appellant Felicia Ruff, *pro se*, by mailing a copy of same, postage prepaid and return address clearly indicated, to the following address:

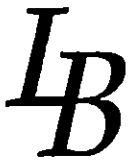
Ms. Felicia Ruff
1455 Hidden Oaks Drive
Wedgefield, South Carolina 29168



Connie W. Grugan

This 3rd day of October, 2019

RECEIVED
OCT 03 2019
SC Court of Appeals



LAW OFFICES OF
**LEWIS
BABCOCK**
L.L.P.

ARIAIL E. KING
ATTORNEY AT LAW

Post Office Box 11208
Columbia, South Carolina 29211
o. 803-771.8000 f. 803-733-3534
AEK@lewisbabcock.com

October 3, 2019

RECEIVED

OCT 03 2019

SC Court of Appeals

HAND DELIVERED
Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Donna Erickson v. Felicia Ruff, Appellate Case No. 2018-001277
Our File No. 19-116

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's Renewed Motion to Dismiss Appeal and for Sanctions in regard to the above-referenced matter for filing with your office, along with a filing fee in the amount of \$50.00. Please return a clocked copy via our courier.

Sincerely yours,

Ariail E. King

AEK:cg
Enclosure
cc: Ms. Felicia Ruff, *pro se*



Lewis Babcock L.L.P.
P.O. Box 11208
Columbia, SC 29211

RECEIVED

OCT 03 2019

SC Court of Appeals

HAND DELIVERED
Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201