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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

APR 09 2021

SC Court of Appeals

Mikell Scarborough
Master-in-Equity

Appellate Case No. 2019-001838

SRP 2011-6, LLC..... Respondent,

v.

Alluette K. Jones, South Carolina Federal Credit Union,
Synovus Bank, and Historic Charleston Foundation.....Defendants,

Of whom Alluette K. Jones is the.....Appellant.

RESPONDENT’S MOTION TO DISMISS APPELLANT’S APPEAL FOR FILING A FINAL BRIEF THAT IS NOT THE SAME AS HER INTIAL BRIEF AS REQUIRED BY THE APPELLATE COURT RULES OR IN THE ALTERNATIVE TO REQUIRE HER TO COMPLY WITH THE APPELLATE COURT RULES FOR FINAL BRIEFS.

Appellant’s “Final Brief” dated March 22, 2021 is not a proper final brief because it does not mirror the Appellant’s Initial Brief in violation of Rule 211 SCACR. Respondent recently filed a motion to dismiss the appeal on the ground the Appellant has not follow the South Carolina Appellate Court Rules with respect to filing a timely record, having ignored various deadlines about that record, and then submitting an alleged Record that does not contain most of the materials designated by Respondent. Now, Appellant adds to her non-compliance by submitting what purports to be a Final Brief of Appellant which does not mirror the Initial Brief of the Appellant. The changes to the brief are not trivial. While there are some passages which appear to be the same, much of the brief is simply new. The Appellant is well-within her rights to represent herself and has demonstrated she is intelligent and capable person. But she appears to have no interest in following the Rules of this Court, forcing the Respondent to file repeated motions to address these problems.

CLAWSON and STAUBES, LLC

s/Timothy A. Domin

Timothy A. Domin

Bar No.: 65264

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Charleston, South Carolina 29492-8144

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Attorney for Respondent

April 7, 2021

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PROOF OF SERVICE

I certify that I have served RESPONDENT'S MOTION TO DISMISS APPEAL BASED ON LACK OF COMPLIANCE WITH APPELLATE RULES REGARDING RECORD ON APPEAL OR IN THE ALTERNATIVE, TO REQUIRE APPELLANT TO SERVE A CORRECT RECORD ON APPEAL AND TO STAY THE RESPONDENT'S TIME TO FILE A FINAL BRIEF PENDING A DISMISSAL OR RECEIPT OF A CORRECT RECORD ON APPEAL by depositing a copy of it in the United States Mail, postage prepaid, on April 7, 2021, addressed to:

Alluette Jones
142 Coming St.
Charleston, South Carolina 29403

Respectfully submitted,

s/Timothy A. Domin

Timothy A. Domin
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126 Seven Farms Drive, Suite 200
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Attorney for Respondent

**CLAWSON
AND
STAUBES**
LLC

Timothy A. Domin
Licensed in SC
tdomin@clawsonandstaubes.com

April 7, 2021

File No.: 20140012.007

VIA US MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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APR 09 2021

SC Court of Appeals

Re: SRP 2011-6, LLC v. Alluette K. Jones, et al
Case No.: 2018-CP-10-02344

Dear Ms. Kitchings:

Enclosed please find for filing, an original and one copy of the Respondent's Motion To Dismiss Appellant's Appeal For Filing A Final Brief That Is Not The Same As Her Initial Brief As Required By The Appellate Court Rules Or In The Alternative To Require Her To Comply With The Appellate Court Rules For Final Briefs.

Thank you very much for your attention to this matter.

Very truly yours,

CLAWSON and STAUBES, LLC

s/Timothy A. Domin
Timothy A. Domin

TAD/crk
Enclosures

cc: Alluette Jones (via US Mail)

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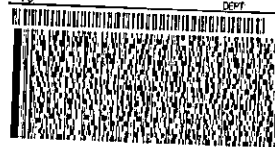
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