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Dec 06 2021

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM CHEROKEE COUNTY
Master-in-Equity, Gordon G. Cooper

Case No.: 2020-CP-11-00040
Appellate Case No: 2021-000017

**Donray Curtis Jones, Cynthia
Denise Jones, Emma Kelly
Washington, and Troy Eliazer
Washington,**

Appellants,

vs.

Yvonne J. Robinson

Respondent.

**RESPONDENT'S MOTION FOR APPELLANTS TO AMEND RECORD ON
APPEAL**

Respondent, Yvonne J. Robinson, by and through its undersigned counsel, hereby moves this Court for an Order requiring Appellants to Amend the Record on Appeal filed with this Court on June 21, 2021. Said motion is not intended to delay this matter, but is based on the fact that the Record on Appeal is missing pages 10, 11, 13, 18, 22, 23, and 38 of the transcripts that were to be included based on Respondent's Designation of Matter that was filed on April 19, 2021. Respondent would ask that the Record on Appeal be amended to reflect the aforementioned page numbers in order to file its Final Brief in this matter. Further, Respondent requests attorney's fees

associated with the filing of this motion to correct errors on the Record on Appeal filed by the Appellants.

December 6, 2021

s/ Scott F. Talley

Scott F. Talley, Esquire

TALLEY LAW FIRM, P.A.

134 Oakland Ave.

Spartanburg, South Carolina 29302

Attorney for Respondent

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Respondent's Motion for Appellants to Amend Record on Appeal has been served via U.S. Mail this 6th day of December, 2021 upon: **Donray Curtis Jones, 125 Hudnut Dr., Pacolet, SC 29372, Cynthia Denise Jones, 125 Hudnut Dr., Pacolet, SC 29372, Emma Kelly Washington, 118 Hudnut Dr., Pacolet, SC 29372, and Troy Eliazer Washington, 118 Hudnut Dr., Pacolet, SC 29372.**

/s/ Hannah L. Hinson
Hannah L. Hinson, Paralegal



Scott F. Talley
Wendy N. Griffith
Roger L. Couch*
* Of Counsel
Ginny L. Merck-Dupont

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VIA U.S. MAIL AND E:MAIL: ctappfilings@sccourts.org

Jenny A. Kitchings, Clerk
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Donray Curtis Jones, Cynthia Denise Jones, Emma Kelly Washington and Troy
Eliazer Washington v. Yvonne J. Robinson
Case No.: 2020-CP-11-00040
Appellate Case No: 2021-000017

Dear Clerk:

Please find enclosed the Respondent's Motion for Appellants to Amend Record on Appeal and a Certificate of Service for Same. By copy of this letter to Appellants, I am serving them with a copy of same.

Sincerely,
TALLEY LAW FIRM, P.A.

Scott F. Talley, Esq.

Scott F. Talley

/hh

Copy to: Donray Curtis Jones (U.S. Mail)
Cynthia Denise Jones (U.S. Mail)
Emma Kelly Washington (U.S. Mail)
Troy Eliazer Washington (U.S. Mail)