

COURT OF APPEALS OF GEORGIA
DOCUMENT RETURN NOTICE FOR BRIEFS OR MOTIONS

January 21, 2015

To: Ms. Deborah D. Drayton, 206 Stafford Avenue, Brunswick, Georgia 31525

Docket Number: A15A0803 **Style:** Deborah Denise Drayton v. Ja'Leah Denise Sands, et al.

Your document(s) is (are) being returned for the following reason(s).

1. Your Appellant's Brief, was not accompanied by the statutory filing fee (\$300.00 civil; \$80.00 criminal *Effective July 1, 2009) or a sufficient pauper's affidavit. OCGA§5-6-4 and Rule 5 **Please be advised that your pauper's affidavit should be notarized by a notary public.**
2. A Request for Oral Argument must be filed as a separate document. Rule 28 (a) (3)
3. Your document(s) was (were) not signed by counsel (No signatures with expressed permission are permitted). Rule 1 (a)
4. **No Certificate of Service accompanied your document(s). Rule 6**
5. Your Certificate of Service did not include the complete name and mailing address of each opposing party. Rules 1(a) and 6. You should provide a copy of your filing to the District Attorney and include his/her name and address on your Certificate of Service.
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10. Your request for court action must be submitted in motion form. Rule 41 (a)
11. Your motions were submitted in an improper form (joint, compound or alternative motions in one document). Rule 41 (b)
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13. The pages were not sequentially numbered with arabic numerals. Rule 24 (e)
14. Case and/or record citations were not made in the proper form. Rules 24 (d) and 25 (c) (2)
15. Margins were too small or paper size incorrect. Rules 1(c), 24(c), 37 (a) and 41(b)
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17. The Motion to Supplement has not been granted.
18. Other: _____

IN THE APPEAL COURT OF GEORGIA
STATE OF GEORGIA

FILED IN OFFICE
JAN 14 2015
COURT CLERK
CLERK COURT OF APPEALS OF GA

DEBORAH DENISE DRAYTON

Appeal A15A0803

APPELLANT

CASE NO. JUV 140240

Vs.

JA'Leah Denise Sands

Lia Latwain Sands

Kathy Denise Sands

APPELLEE

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COURT OF APPEALS OF GA

BRIEF

COME now Deborah Denise Drayton, APPELLANT in the above- captioned cause,
Moves the Court of Appeal on the matter that the Juvenile did in error of disallowing the family to
Testify on her behalf MS. ELIZABETH Sands was told not to say nothing during her TPR HEARING
Ms. ELIZABETH SANDS who is the mother of the of the above Appellee had her Parental Rights
Terminated, Before the Terminating the Rights Mrs. Deborah Denise Drayton who name was
Deborah Denise Kirksey before marriage wasn't giving the proper opportunity along with her twin
Sister Lisa Kirksey Teddy Maxwell and the grandmother of the father Ms. Diane Stroud the, Department
Of Family Children Service has error in finding placement for the kids has also place the kids with
unknown Family and refuse to allow the Elizabeth Sands family to have their nieces nephew the
Department of Human Service/ Department of Family Children Service has also put the above Appellee
in (Harms Way

As to allowing Eli Sands who was severely bitten by an oversize doge while in the custody of the
Department of Family Children Service. As the case manager who was on the case has mislead the
The Juvenile Court as well the Department of Human Service in thinking that she couldn't find any family
Members that would take the kids in their home. Ms. Brittany Turner who no longer a DFC for the
Department of Human Services has enter a falsified document to show that she was unable as Georgia
Law required her in O.C.G.A. § 15-11-211 to do (a) A diligent search shall be initiated at the outset of a
case under this article and shall be conducted throughout the duration of a case, when appropriate.