

RECEIVED

Aug 29 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Marvin H. Dukes, III, Master in Equity & Special Circuit Court Judge

Appeal Case No. 2021-000434

Bluffton Park Community Owners' Association, Inc., Respondent,

v.

Joseph Chakyng Sun, as Trustee of The 2009 Sun's Family Trust in South Carolina, USA;
Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleysa Matyushevsky;
Christine Varg; and Citizens Opposed to Domestic Abuse, Defendants,

of whom Joseph Chakyng Sun, as Trustee of The 2009 Sun's Family Trust in South Carolina,
USA and Joseph Chakyng Sun, Individually is the Appellant.

RESPONDENT'S SUPPLEMENTAL RECORD ON APPEAL

Pleadings

Affidavit of Non-Service filed January 14, 2020 as to Appellant Trust 408-09

- a. Exh. A – December 30, 2019 service to PO Box returned “Refused” with envelope image 410-12
- b. Exh. B – December 30, 2019 service to Property via FedEx tracking signed by A. Sun 413-16
- c. Exh. C – December 30, 2019 service to Property via FedEx returned “Refused: DO NOT WANT PKG” with envelope image 417-18

Affidavit of Non-Service filed January 20, 2020 as to Appellant Sun 419-20

- a. Exh. C – December 30, 2019 service to Property via FedEx returned “Refused: DO NOT WANT PKG” with envelope image 421-22

Certificate of Mailing – Summons for Publication and Notice of Filing filed February 26, 2020 423-24

Affidavit of Default filed June 5, 2020 with exhibits (Sun)..... 425-37

Affidavit of Default filed June 5, 2020 with exhibits (Trust)..... 438-448

Certificate of Service – Verified Statement and Affidavit of Debt, Affidavit of Attorney Fees, etc. dated July 13, 2020 and filed July 14, 2020 449-450

Affidavit of Scott Wild filed July 15, 2020 451-71

Formal Objection to the Circuit Court on Sufficiency of Sureties and Partial Return on Motion for Consideration of Already filed Petition for Writ of Mandamus filed April 30, 2021 475-89

Transcripts

Hearing Transcript of August 4, 2020

a. Exh. 1 472-74

I certify that this designation contains no matter which has not previously been designated or which is irrelevant.

LAW OFFICE OF SCOTT M. WILD, LLC

s/Scott Wild

Scott M. Wild, Esq., S.C. Bar No. 76528

Law Office of Scott M. Wild, LLC

Post Office Box 6867

Hilton Head Island, SC 29938

Phone: (843) 785-9453

scott@wildlawfirm.com

Attorney for Respondent

This 29th day of August 2022,

Hilton Head Island, Beaufort County, South Carolina.

RECEIVED

Aug 29 2022

SC Court of Appeals

FURTHER AFFIANT SAYETH NAUGHT.

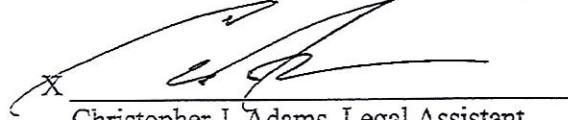
Sworn to and subscribed before me on this

13th day of January, 2020.

Marcy L. Skovton
Notary Public for South Carolina

My Commission Expires: 5-12-2024

LAW OFFICE OF SCOTT M. WILD, LLC

X 

Christopher J. Adams, Legal Assistant

P.O. Box 6867

Hilton Head Island, SC 29938

(843) 785-9453

chris@wildlawfirm.com

Attorney for the Plaintiff

EXHIBIT “A”

to the Affidavit of Non-Service upon The 2009 Sun’s Family Trust in South Carolina,
USA in

Bluffton Park Community Association, Inc.

v.

*Joseph Chakyng Sun as Trustee of The 2009 Sun’s Family Trust in South Carolina, USA,
et al.*

(2019-CP-07-02178)

411

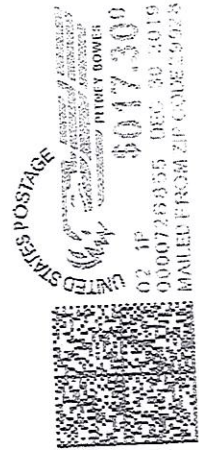


Law Office of Scott M. Wild, LLC
P.O. Box 6867 • Hilton Head Island, SC 29928

CERTIFIED MAIL



7017 1000 0000 2588 5091



22

The 2009 Sun's Family Trust in South Carolina, USA
c/o Joseph Chalking Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

Refused

ELECTRONICALLY FILED - 2020 Jan 14 9:32 AM - BEAUFORT - COMMON PLEAS - CASE#20190CF0702178

RECEIVED
JAN 14 2020
14 9 32 AM
BEAUFORT - COMMON PLEAS
CASE#20190CF0702178

RECEIVED

RECEIVED

RECEIVED

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RECEIVED

UNABLE TO FORWARD

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

The 2009 Duck Family Trust in South Carolina, USA
 c/o Joseph Cheekley Dun
 P.O. Box 2543
 Bluffton, SC 29910



9590 9402 2741 6351 7483 96

2. Article Number (transfer from service label)

0000 0000 2500 5091

PS Form 3811, July 2016 PSN 7530-02-000-9065

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Return Receipt for Merchandise
- Signature Confirmation™
- Signature Confirmation Restricted Delivery

Domestic Return Receipt

EXHIBIT “B”

to the Affidavit of Non-Service upon The 2009 Sun’s Family Trust in South Carolina,
USA in

Bluffton Park Community Association, Inc.

v.

*Joseph Chakyng Sun as Trustee of The 2009 Sun’s Family Trust in South Carolina, USA,
et al.*

(2019-CP-07-02178)



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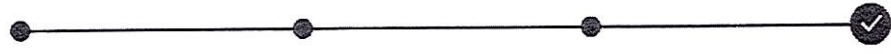


RONICALLY FILED - 2020 Jan 14 9:32 AM - BEAUFORT - COMMON PLEAS - CASE#2019CP0702178





Delivered
Thursday 1/02/2020 at 12:15 pm



DELIVERED

Signed for by: A.SUN



GET STATUS UPDATES
OBTAIN PROOF OF DELIVERY

FROM

Scott Wild
P.O. Box 6867
37 New Orleans Road, Ste. F
Hilton Head Island, SC US 29938
843 785-9453

TO

The 2009 Sun's Family Trust in SC
Joseph Chakyng Sun
BLUFFTON, SC US 29910
843 785-9453

Shipment Facts

TRACKING NUMBER
777356244337

SERVICE
FedEx 2Day

REFERENCE
Bluffton Park

WEIGHT
0.5 lbs / 0.23 kgs

SIGNATURE SERVICES
Direct signature required

DELIVERY ATTEMPTS
1

DELIVERED TO
Residence

TOTAL PIECES
1

TOTAL SHIPMENT WEIGHT
0.5 lbs / 0.23 kgs

TERMS
Shipper

SHIPPER REFERENCE
Bluffton Park

PACKAGING
FedEx Envelope

SPECIAL HANDLING SECTION
Deliver Weekday, Residential Delivery,
Direct Signature Required

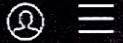
STANDARD TRANSIT
1/02/2020 by 8:00 pm

SHIP DATE
Mon 12/30/2019

ACTUAL DELIVERY
Thu 1/02/2020 12:15 pm

RONICALLY FILED - 2020 Jan 14 9:32 AM - BEAUFORT - COMMON PLEAS - CASE#2019CP0702178






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EXHIBIT “C”

to the Affidavit of Non-Service upon The 2009 Sun’s Family Trust in South Carolina,
USA in

Bluffton Park Community Association, Inc.

v.

*Joseph Chakyng Sun as Trustee of The 2009 Sun’s Family Trust in South Carolina, USA,
et al.*

(2019-CP-07-02178)

Insert shipping document here.

Urgent

ORIGIN ID:HHHA (843) 785-9453
SCOTT WILD

SHIP DATE: 30DEC19
ACTWGT: 0.25 LB
CAD: 107039455/INET4160

P.O. BOX 6867
37 NEW ORLEANS ROAD, STE. F
HILTON HEAD ISLAND, SC 29938
UNITED STATES US

BILL SENDER

TO JOSEPH CHAKYING SUN
THE 2009 SUN'S FAMILY TRUST IN SC
18 SIXTH AVENUE

BLUFFTON SC 29910

(843) 785-9453 REF. BLUFFTON PARK
INV. PO: DEPT.

567J218DD005A2

Ex. HAL

Select package type.

Address Express Ground

Expected day of the week and record date received/returned.

S M T W (T) F S Date received 1/2/20

Expires after 7 days. Return to FedEx on the 8th day.

S M T W T F S Date returned

Check reason for return and give package to FedEx driver.

Not delivered - recipient did not pick up FedEx requested return
Damaged Recipient refused package

Attention Driver / Courier
END TO QA/CARETAKER

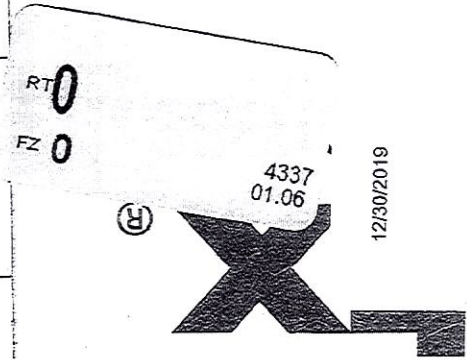
167075 REV 1.



SAV
ST-SC
0166Z
DSR
TUE - 07 JAN AM
*** 2DAY ***
30 HHA
TRK# 7773 5624 4337
FID 3222963 02JAN20 SAV 56K2/1800/1800/0450
11/09 BRD

FedEx RECP REFUS Pcs: 2 1 of 1
06JAN20 12:20 FID: 491723 Rtr#: 832

Refused: DO NOT WANT PKG
Recpt Addr: 18 6 TH AVE
Pkg Trk#*s: 777356244337
777356227757



FURTHER AFFIANT SAYETH NAUGHT.

Sworn to and subscribed before me on this
20th day of January, 2020.

Macy G. Thornton
Notary Public for South Carolina

My Commission Expires: 5.12.2024

LAW OFFICE OF SCOTT M. WILD, LLC

X 

Christopher J. Adams, Legal Assistant
P.O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

EXHIBIT “C”

to the Affidavit of Non-Service upon Joseph Chakyng Sun in

Bluffton Park Community Association, Inc.

v.

*Joseph Chakyng Sun as Trustee of The 2009 Sun’s Family Trust in South Carolina, USA,
et al.*

(2019-CP-07-02178)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Association, Inc.,)	
)	
Lienor,)	Certificate of Mailing
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,)	
)	
Defendants.)	
)	

I, Christopher J. Adams, hereby certify that on February 21, 2020 I mailed one (1) filed copy of the following:

1. Summons for Publication and Notice of Filing

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

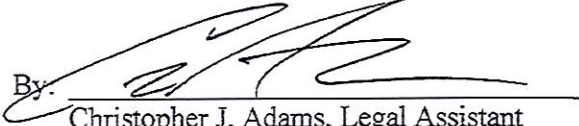
Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

A copy of the foregoing was also served by depositing the same with Federal Express to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910


Respectfully submitted this 26th day of February, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 

Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 26th day of February, 2020.



Notary Public for South Carolina

My Commission Expires: 5.12.2024

5. Pursuant to the Affidavit of Publication, the Summons for Publication and Notice of Filing ran on February 26, 2020, March 4, 2020 and March 11, 2020.

6. Copies of the Summons for Publication and Notice of filing were sent to Joseph Sun as follows:

- a. February 21, 2020: 1) via U.S. Mail to P.O. Box 2543, Bluffton, SC and 2) via Federal Express to 18 Sixth Avenue, Bluffton, SC, as evidenced the Certificate of Mailing, which is of record with this Court as of February 26, 2020, and which is also attached hereto as Exhibit "B";
- b. May 28, 2020 via U.S. Mail to 18 Sixth Avenue, Bluffton, SC, as evidenced the Certificate of Mailing, which is of record with this Court as of May 28, 2020, and which is also attached hereto as Exhibit "C".

7. In order to determine Joseph Sun's military status, if any, he has reviewed the business records of Plaintiff, and inquired about Plaintiff's knowledge of Joseph Sun's military status, all of which indicates that Joseph Sun is not in the Military Service of the U.S. Government;

8. He lacks information necessary to conduct a reliable military service check through government resources.

9. He has uncovered no evidence to indicate that Joseph Sun is in the Military Service of the United States as contemplated by the provisions of the Servicemembers Civil Relief Act, 50 U.S.C. § 501 *et seq.* (as amended);

10. Joseph Sun has failed to serve an Answer, Counterclaim, or other responsive pleading upon Bluffton Park as required by Rule 12 *SCRCP*;

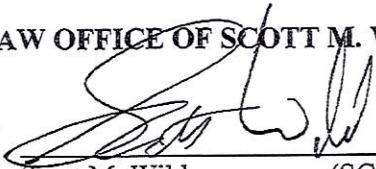
11. Bluffton Park has sent Joseph Sun all applicable and pertinent notices as required by law;

12. Joseph Sun is now in Default; and

13. He has read the contents of this affidavit and know them to be true.

I SO ATTEST.

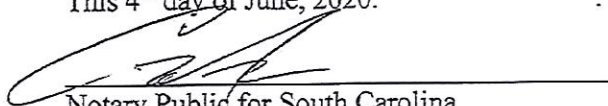
LAW OFFICE OF SCOTT M. WILD, LLC

X 

Scott M. Wild (SC Bar # 76528)
P.O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453 (888) 785-9438 (fax)
scott@wildlawfirm.com
Attorneys for Plaintiff

Sworn to and subscribed before me on

This 4th day of June, 2020.



Notary Public for South Carolina
My Commission Expires on: 08-4-2026

EXHIBIT “A”

to Affidavit of Default and Non-Military Service of Joseph Chakyng Sun in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun’s Family Trust in South Carolina, et al.

(2019-CP-07-02178)

THE ISLAND PACKET

AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
445953	0004573756	STATE OF SOUTH CAROLINA COUNTY OF BE	INS CIVIL ACTION #: 2019-CP-07	\$937.60	2	65

Attention:

LAW OFFICE OF SCOTT M. WILD, LLC
 PO BOX 6867
 HILTON HEAD ISLAND, SC 29938

STATE OF)
 SOUTH CAROLINA) AFFIDAVIT
 COUNTY OF BEAUFORT)

STATE OF SOUTH CAROLINA
 COUNTY OF BEAUFORT
 IN THE COURT OF COMMON PLEAS
 FOR THE 14TH JUDICIAL CIRCUIT
 CIVIL ACTION #: 2019-CP-07-02178
 Summons for Publication and
 Notice of Filing

Bluffton Park Community Association, Inc.,
 Lienor,
 vs.
 Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liang Sun n/a/a Liang Walsh; Oleyssa Matyushovsky; Christine Varg; and Citizens Opposed to Domestic Abuse,
 Defendant(s).

TO: JOSEPH CHAKYNG SUN AS TRUSTEE OF THE 2009 SUN'S FAMILY TRUST IN SOUTH CAROLINA, USA; and JOSEPH CHAKYNG SUN, INDIVIDUALLY:
 YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to said Complaint upon the subscriber, Scott M. Wild, Esquire, in his office at Law Office of Scott M. Wild, LLC, P.O. Box 6867, Hilton Head Island, South Carolina 29938 (mailing) or 37 New Orleans Road, Suite F, Hilton Head Island, South Carolina 29938 (physical) within thirty (30) days after the service hereof and sixty (60) days if you are the United States of America, exclusive of the day of such service, and if you fail to answer such Complaint within the time aforesaid, the Plaintiff herein, Bluffton Park Community Association, Inc. (hereinafter, "Plaintiff"), will apply to the Court for the relief demanded in the Complaint and judgment by default may be rendered against you.
 YOU WILL ALSO TAKE NOTICE that undersigned will move for an Order of Reference or that the Court may issue a general Order of Reference of this action to a Master or Special Referee pursuant to Rule 53 of the South Carolina Rules of Civil Procedure ("SCRPC").
 TO MINOR(S) OVER FOURTEEN YEARS OF AGE, AND/OR TO MINOR(S) UNDER FOURTEEN YEARS OF AGE AND THE PERSON WITH WHOM THE MINOR(S) RESIDE, AND/OR TO PERSONS UNDER SOME LEGAL DISABILITY: TO PERSONS IN THE SERVICE OF THE MILITARY OF THE UNITED STATES OF AMERICA AS CONTEMPLATED BY THE SERVICEMEMBERS CIVIL RELIEF ACT, 50 U.S.C. ANN. § 501, ET SEQ. (AS AMENDED);
 YOU ARE HEREBY FURTHER SUMMONED AND NOTIFIED to apply for the appointment of a guardian ad litem within thirty (30) days after the service of this Summons and Notice of Filing upon you. If you fail to do so, the undersigned shall make application for such appointment.

NOTICE OF FILING
 Take Notice that the Summons in the above-title action, together with the Complaint, was filed with the Office of the Clerk of Beaufort County on October 1, 2019.

LAW OFFICE OF SCOTT M. WILD, LLC
 By: s/Scott M. Wild
 SC Bar # 76528
 Attorney for the Plaintiff
 Post Office Box 6867
 Hilton Head Island, SC 29938
 (843) 785-9453
 scott@wilslawfirm.com
 Dated this 23rd day of December, 2019,
 Hilton Head Island, Beaufort County, South Carolina.

I, Michelle Long, makes oath that the advertisement, was published in The Island Packet and The Beaufort Gazette, a newspaper published in Beaufort County, State and County aforesaid, in the issue(s) of

3 Insertions


Published On:

February 26, 2020, March 04, 2020,
 March 11, 2020



Michelle Long
 Inside Classified Accounts
 Representative

Subscribed and sworn to before me
 this 13th day of March, 2020



Amy L. Robbins
 Notary Public for South Carolina
 My Commission Expires:
 November 27, 2022

ELECTRONICALLY FILED - 2/22/20 10:05 AM - HILTON HEAD ISLAND - COMMONS/PL/LEANS - CASH#201903170217/88

EXHIBIT “B”

to Affidavit of Default and Non-Military Service of Joseph Chakyng Sun in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun’s Family Trust in South Carolina, et al.

(2019-CP-07-02178)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14 TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Association, Inc.,)	
)	
Lienor,)	Certificate of Mailing
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,)	
)	
Defendants.)	
)	

I, Christopher J. Adams, hereby certify that on February 21, 2020 I mailed one (1) filed copy of the following:

1. Summons for Publication and Notice of Filing

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

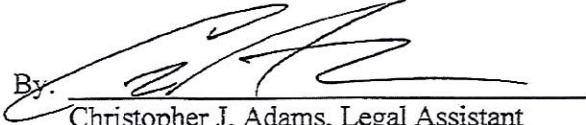
Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

A copy of the foregoing was also served by depositing the same with Federal Express to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910


Respectfully submitted this 26th day of February, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 

Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 26th day of February, 2020.


Notary Public for South Carolina

My Commission Expires: 5-12-2024

EXHIBIT “C”

to Affidavit of Default and Non-Military Service of Joseph Chakyng Sun in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun’s Family Trust in South Carolina, et al.

(2019-CP-07-02178)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14 TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Association, Inc.,)	
)	
Plaintiff,)	Certificate of Mailing
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,)	
)	
Defendants.)	

I, Christopher J. Adams, hereby certify that on May 28, 2020 I mailed one (1) filed copy of the following:

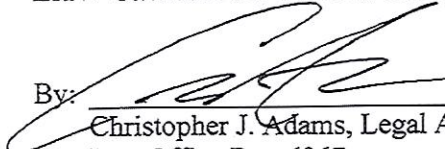
1. Summons for Publication and Notice of Filing

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910

Respectfully submitted this 28th day of May, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 
Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 28th day of May, 2020.



Notary Public for South Carolina

My Commission Expires: 5.12.2024

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14 TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL CASE NO.: 2019-CP-07-02178
)	
Bluffton Park Community Owners)	
Association, Inc.,)	
)	
Plaintiff,)	Certificate of Service
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The)	
2009 Sun's Family Trust in South)	
Carolina, USA; Joseph Chakyng Sun,)	
Individually; Liling Sun n/k/a Liling)	
Walsh; Olesya Matyushevsky; Christine)	
Varg; and Citizens Opposed to Domestic)	
Abuse,)	
)	
Defendant(s).)	
)	

I, Christopher J. Adams, hereby certify that on July 13, 2020 I served one (1) unfiled copy of the following documents:

1. Proposed Master's Decree of Foreclosure, Sale, and Judgment (\$21,115.47) with Form 4;
2. Affidavit of Attorney Fees, Costs and Expenses;
3. Proposed Record of Testimony;
4. Verified Statement, and Affidavit of Debt; and
5. Proposed Notice of Sale

by depositing the same for delivery at the United States Post Office, Hilton Head Island, South Carolina, respectively, with first class postage prepaid to:

Joseph Sun, Individually and
The 2009 Sun's Family Trust in South
Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910

Joseph Sun, Individually and
The 2009 Sun's Family Trust in South
Carolina, USA
c/o Joseph Chakyng Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

A copy of the foregoing documents were also served upon Joseph Chakyng Sun Individually and as Trustee of The 2009 Sun's Family Trust in South Carolina, USA via electronic attachment to: jossunn1095@yahoo.com.

Respectfully submitted this 13th day of July, 2020, in the Town of Hilton Head Island, Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, LLC

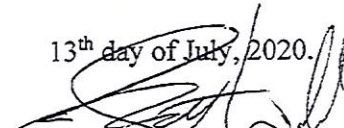
By: 

Christopher J. Adams, Legal Assistant
P.O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com

*Attorney for the Plaintiff, Bluffton Park
Community Owners Association, Inc.*

Sworn to and subscribed before me on this

13th day of July, 2020.



Notary Public for South Carolina

My Commission Expires: 2-8-28

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14 TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Owners)	
Association, Inc.,)	
)	
Plaintiff,)	Affidavit of Default and
)	Non-Military Service
vs.)	(The 2009 Sun's Family Trust in South
)	Carolina, USA)
)	
Joseph Chakyng Sun as Trustee of The)	
2009 Sun's Family Trust in South Carolina,)	
USA; Joseph Chakyng Sun, Individually;)	
Liling Sun n/k/a Liling Walsh; Olesya)	
Matyushevsky; Christine Varg; and)	
Citizens Opposed to Domestic Abuse,)	
)	
Defendant(s).)	
)	

Personally appeared before me, Scott M. Wild, Esq., who being duly sworn, under oath, and under penalty of perjury, states that:

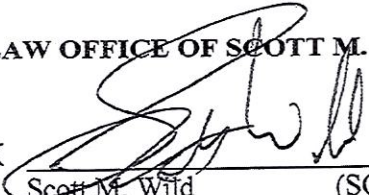
1. He is the attorney for the Plaintiff in this action, Bluffton Park Community Association, Inc. (hereinafter, "Bluffton Park");
2. Bluffton Park filed its Summons & Complaint, *Lis Pendens*, and Certificate of Exemption from South Carolina Supreme Court Administrative Order 2011-05-02-01 on October 1, 2019 (hereinafter, collectively referred to as the "Complaint").
3. More than thirty (30) days have elapsed since Bluffton Park served a copy of the Complaint upon Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA (hereinafter the "Sun's Family Trust"), by serving a copy upon the Sun's Family Trust, exclusive of the date of service;

4. Service was accomplished upon Sun's Family Trust through Publication, service being effected March 11, 2020, as evidenced by the Affidavit of Publication, which is of record with this Court as of March 18, 2020, and which is also attached hereto as Exhibit "A";
5. Pursuant to the Affidavit of Publication, the Summons for Publication and Notice of Filing ran on February 26, 2020, March 4, 2020 and March 11, 2020.
6. Copies of the Summons for Publication and Notice of filing were sent to Sun's Family Trust as follows:
 - a. February 21, 2020: 1) via U.S. Mail to P.O. Box 2543, Bluffton, SC and 2) via Federal Express to 18 Sixth Avenue, Bluffton, SC, as evidenced the Certificate of Mailing, which is of record with this Court as of February 26, 2020, and which is also attached hereto as Exhibit "B";
 - b. May 28, 2020 via U.S. Mail to 18 Sixth Avenue, Bluffton, SC, as evidenced the Certificate of Mailing, which is of record with this Court as of May 28, 2020, and which is also attached hereto as Exhibit "C".
7. Sun's Family Trust is not a natural person and therefore is not a member of the Armed Services of the United States of America;
8. Sun's Family Trust has failed to serve an Answer, Counterclaim, or other responsive pleading upon the Bluffton Park as required by Rule 12 *SCRCP*;
9. Bluffton Park has sent Sun's Family Trust all applicable and pertinent notices as required by law;
10. Sun's Family Trust is now in Default; and
11. He has read the contents of this affidavit and know them to be true.

[SIGNATURE AND NOTARIZATION PAGE FOLLOWS]

I SO ATTEST.

LAW OFFICE OF SCOTT M. WILD, LLC

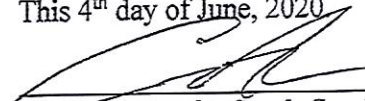
X 

Scott M. Wild (SC Bar # 76528)

P.O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453 (888) 785-9438 (fax)
scott@wildlawfirm.com
Attorneys for Plaintiff

Sworn to and subscribed before me on

This 4th day of June, 2020



Notary Public for South Carolina
My Commission Expires on: 08-24-2026

EXHIBIT "A"

to Affidavit of Default and Non-Military Service of The 2009 Sun's Family Trust in
South Carolina, USA in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun's Family Trust in South Carolina, et al.

(2019-CP-07-02178)

THE ISLAND PACKET

AFFIDAVIT OF PUBLICATION

Account #	Ad Number	Identification	PO	Amount	Cols	Lines
445953	0004573756	STATE OF SOUTH CAROLINA COUNTY OF BE	ns CIVIL ACTION #: 2019-CP-07	\$937.60	2	65

Attention:

LAW OFFICE OF SCOTT M. WILD, LLC
 PO BOX 6867
 HILTON HEAD ISLAND, SC 29938

STATE OF)
 SOUTH CAROLINA) AFFIDAVIT
 COUNTY OF BEAUFORT)

STATE OF SOUTH CAROLINA
 COUNTY OF BEAUFORT
 IN THE COURT OF COMMON PLEAS
 FOR THE 14TH JUDICIAL CIRCUIT
 CIVIL ACTION #: 2019-CP-07-02178
 Summons for Publication and
 Notice of Filing

Bluffton Park Community Association, Inc.,
 Lienor,
 vs.
 Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,
 Defendant(s).

TO: JOSEPH CHAKYNG SUN AS TRUSTEE OF THE 2009 SUN'S FAMILY TRUST IN SOUTH CAROLINA, USA; and JOSEPH CHAKYNG SUN, INDIVIDUALLY:
 YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to said Complaint upon the subscriber, Scott M. Wild, Esquire, in his office at Law Office of Scott M. Wild, LLC, P.O. Box 6867, Hilton Head Island, South Carolina 29938 (mailing) or 37 New Orleans Road, Suite F, Hilton Head Island, South Carolina 29928 (physical) within thirty (30) days after the service hereof and sixty (60) days if you are the United States of America, exclusive of the day of such service, and if you fail to answer such Complaint within the time aforesaid, the Plaintiff herein, Bluffton Park Community Association, Inc. (hereinafter, "Plaintiff"), will apply to the Court for the relief demanded in the Complaint and judgment by default may be rendered against you.
 YOU WILL ALSO TAKE NOTICE that undersigned will move for an Order of Reference or that the Court may issue a general Order of Reference of this action to a Master or Special Referee pursuant to Rule 53 of the South Carolina Rules of Civil Procedure ("SCRCP").
 TO MINORS: OVER FOURTEEN YEARS OF AGE, AND/OR TO MINOR(S) UNDER FOURTEEN YEARS OF AGE AND THE PERSON WITH WHOM THE MINOR(S) RESIDE, AND/OR TO PERSONS UNDER SOME LEGAL DISABILITY: TO PERSONS IN THE SERVICE OF THE MILITARY OF THE UNITED STATES OF AMERICA AS CONTEMPLATED BY THE SERVICEMEMBERS CIVIL RELIEF ACT, 50 U.S.C. ANN. § 501, ET SEQ. (AS AMENDED):
 YOU ARE HEREBY FURTHER SUMMONED AND NOTIFIED to apply for the appointment of a guardian ad litem within thirty (30) days after the service of this Summons and Notice of Filing upon you. If you fail to do so, the undersigned shall make application for such appointment.

NOTICE OF FILING
 Take Notice that the Summons in the above-titled action, together with the Complaint, was filed with the Office of the Clerk of Beaufort County on October 1, 2019.

LAW OFFICE OF SCOTT M. WILD, LLC
 By: s/Scott M. Wild
 SC Bar # 76528
 Attorney for the Plaintiff
 Post Office Box 6867
 Hilton Head Island, SC 29938
 (843) 785-9453
 scott@wildlawfirm.com
 Dated this 23rd day of December, 2019,
 Hilton Head Island, Beaufort County, South Carolina.

I, Michelle Long, makes oath that the advertisement, was published in The Island Packet and The Beaufort Gazette, a newspaper published in Beaufort County, State and County aforesaid, in the issue(s) of

3 Insertions

Published On:

February 26, 2020, March 04, 2020,
 March 11, 2020



Michelle Long
 Inside Classified Accounts
 Representative

Subscribed and sworn to before me
 this 13th day of March, 2020



Amy L. Robbins
 Notary Public for South Carolina
 My Commission Expires:
 November 27, 2022

FILED IN COURT OF COMMON PLEAS FOR THE 14TH JUDICIAL CIRCUIT IN THE COUNTY OF BEAUFORT, SOUTH CAROLINA ON 03/13/2020 BY AMY L. ROBBINS, CLERK OF COURT.

EXHIBIT "B"

to Affidavit of Default and Non-Military Service of The 2009 Sun's Family Trust in
South Carolina, USA in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun's Family Trust in South Carolina, et al.

(2019-CP-07-02178)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14 TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Association, Inc.,)	
)	
Lienor,)	Certificate of Mailing
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,)	
)	
Defendants.)	
)	

I, Christopher J. Adams, hereby certify that on February 21, 2020 I mailed one (1) filed copy of the following:

1. Summons for Publication and Notice of Filing

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

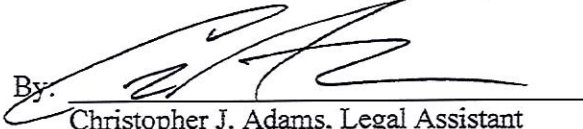
Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

A copy of the foregoing was also served by depositing the same with Federal Express to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910


Respectfully submitted this 26th day of February, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 

Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 26th day of February, 2020.


Notary Public for South Carolina

My Commission Expires: 5.12.2024

EXHIBIT “C”

to Affidavit of Default and Non-Military Service of The 2009 Sun’s Family Trust in
South Carolina in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun’s Family Trust in South Carolina, et al.

(2019-CP-07-02178)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14 TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Association, Inc.,)	
)	
Plaintiff,)	Certificate of Mailing
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,)	
)	
Defendants.)	

I, Christopher J. Adams, hereby certify that on May 28, 2020 I mailed one (1) filed copy of the following:

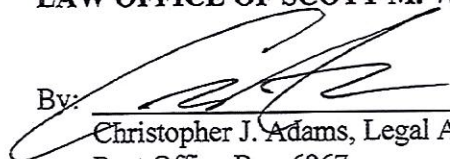
1. Summons for Publication and Notice of Filing

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910

Respectfully submitted this 28th day of May, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 
Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 28th day of May, 2020.



Notary Public for South Carolina

My Commission Expires: 5.12.2024

A copy of the foregoing documents were also served upon Joseph Chakyng Sun Individually and as Trustee of The 2009 Sun's Family Trust in South Carolina, USA via electronic attachment to: jossunn1095@yahoo.com.

Respectfully submitted this 13th day of July, 2020, in the Town of Hilton Head Island, Beaufort County, South Carolina.

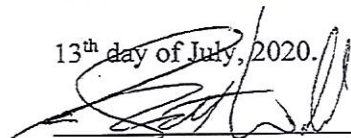
LAW OFFICE OF SCOTT M. WILD, LLC

By: 

Christopher J. Adams, Legal Assistant
P.O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
*Attorney for the Plaintiff, Bluffton Park
Community Owners Association, Inc.*

Sworn to and subscribed before me on this

13th day of July, 2020.



Notary Public for South Carolina

My Commission Expires: 2-8-28

5. The documents referenced herein and attached as Exhibits are part of his business records and are true and accurate copies of the same in his possession.

6. He has personal knowledge of the documents attached hereto and has reviewed the same in preparation of this Affidavit.

7. On December 30, 2020 the undersigned attempted service on the Sun Defendants via certified mail restricted delivery mail at P.O. Box 2543, Bluffton SC 29910. Copies of the returned certified mailing envelopes were included as exhibits in Plaintiff's Amended Affidavit in Support of Publication; however, attached hereto as Exhibit "1" is a copy of the letter and Certified Mail Receipt regarding said service attempt.

8. On January 27, 2020 a filed copy of the Amended Affidavit in Support of Publication was mailed to the Sun Defendants at the property address and to P.O. Box 2543, Bluffton SC 29910, via First Class US Mail. The mailing to the property address only was returned. A copy of the Certificate of Service documenting the mailing and the returned envelopes is attached hereto as Exhibit "2".

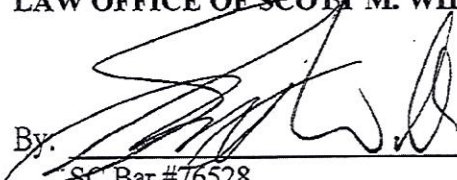
9. On February 11, 2020 a filed copy of the Order for Publication was sent to the Sun Defendants at the property address and to P.O. Box 2543, Bluffton SC 29910 via certified mail. The certified mailings were returned to his office as "unclaimed". A copy of the Letter with the Certified Mail Receipt and the Certificate of Service documenting the mailing and the returned certified envelopes is attached hereto as Exhibit "3".

10. On February 21, 2020 a filed copy of the Summons for Publication and Notice of Filing was sent to the Sun Defendants via First Class US Mail to P.O. Box 2543, Bluffton, SC 29910 and via Federal Express to the property address. The Federal Express mailing was returned

due to "no recipient" and the US Mail did not. A copy of the Certificate of Service documenting the mailing and the returned Federal Express envelope is attached hereto as Exhibit "4".

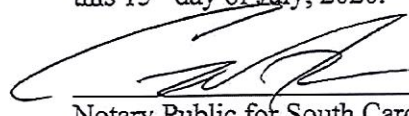
THE AFFIANT FURTHER SAYETH NAUGHT.

LAW OFFICE OF SCOTT M. WILD, LLC

By: 

SC Bar #76528
Attorney for the Plaintiff
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
scott@wildlawfirm.com

Sworn to and subscribed before me
this 15th day of July, 2020.



Notary Public for South Carolina

My Commission Expires: 08-24-2026

Exhibit 1



Law Office of Scott M. Wild, LLC

www.wildlawfirm.com
scott@wildlawfirm.com

p: 843.785.9453
f: 888.785.9438

37 New Orleans Rd, Suite F
Hilton Head Island, SC 29928

P.O. Box 6867
Hilton Head Island, SC 29938

December 30, 2019

Via First Class Certified Mail
Restricted Delivery, Return Receipt Requested and
Via Federal Express

Joseph Chakyng Sun
18 Sixth Avenue
Bluffton, SC 29910
(Via Federal Express)

Joseph Chakyng Sun
P.O. Box 2543
Bluffton, SC 29910
Article No. 7017 1000 0000 2588 5107

Re: Service of Summons, Complaint, Lis Pendens and Certificate of Exemption
Matter: Bluffton Park Community Association, Inc. v. Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, et al.
Case #: 2019-CP-07-02178
My Client(s): Bluffton Park Community Association, Inc.

Dear Joseph Chakyng Sun:

Relative to the above-captioned matter, enclosed herein you will find a copy of the Summons & Complaint, Lis Pendens and Certificate of Exemption, being served upon you individually.

If you have any questions or comments, or if you need any additional information, please do not hesitate to contact me. I truly appreciate your assistance with this matter.

With kindest regards, I am,

Sincerely,
Law Office of Scott M. Wild, LLC

Joseph J. Adams
Legal Assistant

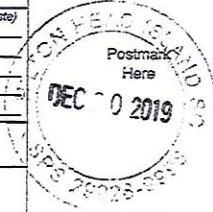
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Certified Mail Fee	\$ 3.50
Extra Services & Fees (check box, add fee as appropriate)	
<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$ 2.80
<input type="checkbox"/> Return Receipt (electronic)	\$
<input checked="" type="checkbox"/> Certified Mail Restricted Delivery	\$ 9.80
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$ 2.20
Total Postage and Fees	\$ 17.30
Sent To	Joseph Chakyng Sun Street and Apt. No., or P.O. Box No. P.O. Box 2543 City, State, ZIP+4® Bluffton, SC 29910

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



ELECTRONICALLY FILED - 2020 Jul 15 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2019CP0702178



Law Office of Scott M. Wild, LLC

www.wildlawfirm.com | p: 843.785.9453 | 37 New Orleans Rd, Suite F | P.O. Box 6867
 scott@wildlawfirm.com | f: 888.785.9438 | Hilton Head Island, SC 29928 | Hilton Head Island, SC 29938

December 30, 2019

Via First Class Certified Mail
Restricted Delivery. Return Receipt Requested and
Via Federal Express

The 2009 Sun's Family Trust in South Carolina,
 USA
 c/o Joseph Chakyng Sun, Trustee
 18 Sixth Avenue
 Bluffton, SC 29910
 (Via Federal Express)

The 2009 Sun's Family Trust in South Carolina,
 USA
 c/o Joseph Chakyng Sun, Trustee
 P.O. Box 2543
 Bluffton, SC 29910
 Article No. 7017 1000 0000 2588 5091

Re: Service of Summons, Complaint, Lis Pendens and Certificate of Exemption
Matter: Bluffton Park Community Association, Inc. v. Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, et al.
Case #: 2019-CP-07-02178
My Client(s): Bluffton Park Community Association, Inc.

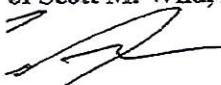
Dear Joseph Chakyng Sun:

Relative to the above-captioned matter, enclosed herein you will find a copy of the Summons & Complaint, Lis Pendens and Certificate of Exemption, being served upon you as the Trustee for The 2009 Sun's Family Trust in South Carolina, USA.

If you have any questions or comments, or if you need any additional information, please do not hesitate to contact me. I truly appreciate your assistance with this matter.

With kindest regards, I am,

Sincerely,
 of Scott M. Wild, LLC


 Christopher J. Adams
 Legal Assistant

1605 9952 0000 0007 2102

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
Certified Mail Fee	\$ 3.50
Extra Services & Fees (check box, and fee as appropriate)	
<input checked="" type="checkbox"/> Return Receipt (hardcopy)	\$ 2.10
<input type="checkbox"/> Return Receipt (electronic)	\$
<input checked="" type="checkbox"/> Certified Mail Restricted Delivery	\$ 3.80
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$ 2.20
Total Postage and Fees	\$ 17.30
Sent To	The 2009 Sun's Family Trust in South Carolina, USA Street and Apt. No., or PO Box No. P.O. Box 2543 City, State, ZIP+4® Bluffton, SC 29910
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	



Exhibit 2

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
) FOR THE 14TH JUDICIAL CIRCUIT
 COUNTY OF BEAUFORT) CIVIL ACTION #: 2019-CP-07-02178
)
 Bluffton Park Community Association,)
 Inc.,)
)
 Lienor,) **Certificate of Service**
)
 vs.)
)
 Joseph Chakyng Sun as Trustee of The)
 2009 Sun's Family Trust in South)
 Carolina, USA; Joseph Chakyng Sun,)
 Individually; Liling Sun n/k/a Liling)
 Walsh; Oleyssa Matyushevsky; Christine)
 Varg; and Citizens Opposed to Domestic)
 Abuse,)
)
 Defendants.)

I, Christopher J. Adams, hereby certify that I have, this date, served one (1) filed copy of the following:

- 1. Amended Affidavit in Support of Publication

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

The 2009 Sun's Family Trust in South Carolina, USA c/o Joseph Chakyng Sun, Trustee 18 Sixth Avenue Bluffton, SC 29910	Joseph Chakyng Sun 18 Sixth Avenue Bluffton, SC 29910
--	---

The 2009 Sun's Family Trust in South Carolina, USA c/o Joseph Chakyng Sun, Trustee P.O. Box 2543 Bluffton, SC 29910	Joseph Chakyng Sun P.O. Box 2543 Bluffton, SC 29910
--	---

[CERTIFICATION PAGE FOLLOWS]

CERTIFICATION PAGE
2019-CP-07-02178


Respectfully submitted this 27th day of January, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 

Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 27th day of January, 2020.


Notary Public for South Carolina

My Commission Expires: 5.12.2024

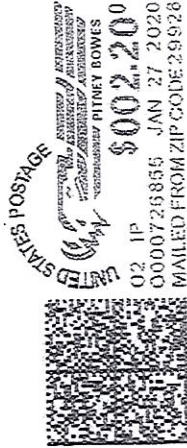
BC: 29938686767 2040N104190-01086
NOTICE 274 7E 1 0204/13/20
RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD



Law Office of Scott M. Wild, LLC
P.O. Box 6867 • Hilton Head Island, SC 29938

RETURN

Joseph Chakyng Sun
18 Sixth Avenue
Bluffton, SC 29910



BC: 29938686767 2040N1051A3
NEXIE 274 AC 1 0204
RETURN TO SENDER
UNDELIVERABLE AS ADDRESSEE
UNABLE TO FORWARD



Law Office of Scott M. Wild, LLC
P.O. Box 6807 • Hilton Head Island, SC 29928

RETURN



The 2009 Sun's Family Trust in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910

Exhibit 3



Law Office of Scott M. Wild, LLC

www.wildlawfirm.com
scott@wildlawfirm.com

p: 843.785.9453
f: 888.785.9438

37 New Orleans Rd, Suite F
Hilton Head Island, SC 29928

P.O. Box 6867
Hilton Head Island, SC 29938

February 11, 2020

Via First Class Certified Mail

Joseph Chakyng Sun and
The 2009 Sun's Family Trust in South
Carolina, USA c/o Joseph Chakyng Sun,
Trustee
18 Sixth Avenue
Bluffton, SC 29910
Article No.: 7019 1120 0001 2422 2958

Joseph Chakyng Sun and
The 2009 Sun's Family Trust in South
Carolina, USA c/o Joseph Chakyng Sun,
Trustee
P.O. Box 2543
Bluffton, SC 29910
Article No.: 7019 1120 0001 2422 2965

Re: Order for Publication
Matter: Bluffton Park Community Association, Inc. v. Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, et al.
Case #: 2019-CP-07-02178
My Client(s): Bluffton Park Community Association, Inc.

Dear Joseph Chakyng Sun:

Relative to the above-captioned matter, enclosed herein you will find a filed copy of the Order for Publication regarding the above referenced matter, being served upon you individually and as the Trustee for The 2009 Sun's Family Trust in South Carolina, USA.

If you have any questions or comments, or if you need any additional information, please do not hesitate to contact me. I truly appreciate your assistance with this matter.

With kindest regards, I am,

Sincerely,
Law Office of Scott M. Wild, LLC

Christopher J. Adam
Legal Assistant

5942 2242 T000 021T 6T0L

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
Certified Mail Fee \$ 3.50	
Extra Services & Fees (check box, add fee as appropriate)	
<input checked="" type="checkbox"/> Return Receipt (hardcopy) \$ 2.50	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$ 0.65	
Total Postage and Fees \$ 6.95	
Sent To Joseph Sun & Sun's Family Trust Street and Apt. No., or PO Box No. P.O. Box 2543 City, State, ZIP+4® Bluffton, SC 29910	

463

9542 2242 T000 021T 6T0L

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT <i>Domestic Mail Only</i>	
For delivery information, visit our website at www.usps.com ®	
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Certified Mail Fee \$ 3.50	
Extra Services & Fees (check box, add fee as appropriate)	
<input checked="" type="checkbox"/> Return Receipt (hardcopy) \$ 2.50	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$ 0.65	
Total Postage and Fees \$ 6.95	
Sent To Joseph Sun & Sun's Family Trust Street and Apt. No., or PO Box No. 18 Sixth Ave. City, State, ZIP+4® Bluffton, SC 29910	

ELECTRONICALLY FILED - 2020 Jul 15 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2019CP0702178

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

) IN THE COURT OF COMMON PLEAS
) FOR THE 14TH JUDICIAL CIRCUIT
) CIVIL ACTION #: 2019-CP-07-02178

Bluffton Park Community Association,
Inc.,

Lienor,

vs.

Joseph Chakyng Sun as Trustee of The
2009 Sun's Family Trust in South
Carolina, USA; Joseph Chakyng Sun,
Individually; Liling Sun n/k/a Liling
Walsh; Oleyssa Matyushevsky; Christine
Varg; and Citizens Opposed to Domestic
Abuse,

Defendants.

Certificate of Mailing

I, Christopher J. Adams, hereby certify that I have, this date, mailed one (1) filed copy of the following:

- 1. Order for Publication

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class certified mail postage prepaid to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910


Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

[CERTIFICATION PAGE FOLLOWS]

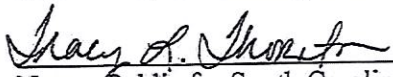
CERTIFICATION PAGE
2019-CP-07-02178

Respectfully submitted this 11th day of February, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By: 
Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 11th day of February, 2020.


Notary Public for South Carolina

My Commission Expires: 5-12-2024

ELECTRONICALLY FILED - 2020 Feb 11 02:12:08 PM - BEAUFORT - COMMON PLEAS - CASE#2019CP0702178

ELECTRONICALLY FILED 2009 Jul 15 12:05 PM



Low Office of Scott M. Wild, LLC
PO, Box 6867 • Hilton Head Island, SC 29928

BEAUFORT COUNTY, SOUTH CAROLINA CASE # 2019CP0702178



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*2009
2-13-12*

Joseph Chakyng Sun and
The 2009 Sun's Family Trust in South Carolina,
USA c/o Joseph Chakyng Sun, Trustee
18 Six
Bluff

29938-6867
29938-6867

UNC

FC 29938686757

115A-6995-1-4

SETTER TO BORDER
UNCLAIRED
UNABLE TO FORWARD

CERTIFIED MAIL



Low Office of Scott M. Wild, LLC
PO, Box 6867 • Hilton Head Island, SC 29928

2/13



7019 1120 0001 2422 2958



Joseph Chakyng Sun and
The 2009 Sun's Family Trust in South Carolina,
USA c/o Joseph Chakyng Sun, Trustee
P.O.
Bluff

FC 29938686757

115A-6995-1-4

SETTER TO BORDER
UNCLAIRED
UNABLE TO FORWARD

29938-6867
29938-6867

UNC

FC 29938686757

115A-6995-1-4

Exhibit 4

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE 14TH JUDICIAL CIRCUIT
COUNTY OF BEAUFORT)	CIVIL ACTION #: 2019-CP-07-02178
)	
Bluffton Park Community Association, Inc.,)	
)	
Lienor,)	Certificate of Mailing
)	
vs.)	
)	
Joseph Chakyng Sun as Trustee of The 2009 Sun's Family Trust in South Carolina, USA; Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleyssa Matyushevsky; Christine Varg; and Citizens Opposed to Domestic Abuse,)	
)	
Defendants.)	
)	

I, Christopher J. Adams, hereby certify that on February 21, 2020 I mailed one (1) filed copy of the following:

- 1. Summons for Publication and Notice of Filing

A copy of the foregoing was served by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

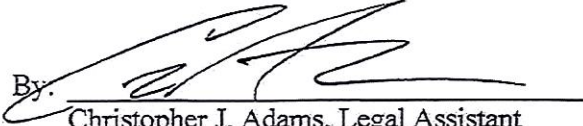
Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
P.O. Box 2543
Bluffton, SC 29910

A copy of the foregoing was also served by depositing the same with Federal Express to:

Joseph Chakyng Sun and
The 2009 Sun's Family Trust
in South Carolina, USA
c/o Joseph Chakyng Sun, Trustee
18 Sixth Avenue
Bluffton, SC 29910


Respectfully submitted this 26th day of February, 2020, in the Town of Hilton Head Island,
Beaufort County, South Carolina.

LAW OFFICE OF SCOTT M. WILD, L.L.C.

By. 

Christopher J. Adams, Legal Assistant
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
chris@wildlawfirm.com
Attorney for the Plaintiff

Sworn to and subscribed before me on
this 26th day of February, 2020.


Notary Public for South Carolina

My Commission Expires: 5-12-2024

ELECTRONICALLY FILED - 2020 Jul 15 12:05 PM - BEAUFORT - COMMON PLEAS - CASE#2019CP0702178

Insert shipping document here.

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Page 1 r

ORIGIN ID:HHHA (800) 463-3339
FEDEX HHHA
20 HUNTER RD
HILTON HEAD, SC 29926
UNITED STATES US

SHIP DATE: 02MAR20
ACTWGT: 0.25 LB
CAD: 250574935/INET4220

BILL RECIPIENT

TO SCOTT WILD

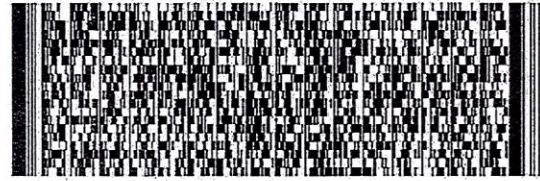
37 NEW ORLEANS ROAD, STE. F

HILTON HEAD ISLAND SC 29938

(843) 785-9453
INV.
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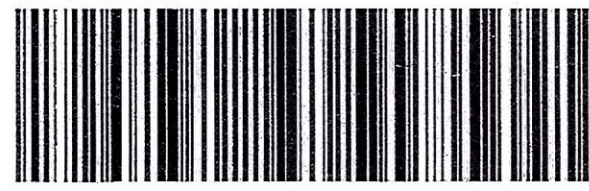


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T F S Date returned

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not pick up FedEx requested return

Recipient refused package

house. Not recipient

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OOA/CARETAKER

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Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 2 Corpus Christi, Suite #302
 Hilton Head Island, SC 29928

Phone: 843-785-4775

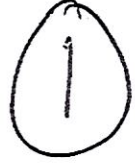
Account Number	Statement Date
46904	7/9/2020
Due Date	Amount Due
	17,961.28

Make checks payable to your association

Family Trust Sun
 18 Sixth Avenue
 Bluffton, SC 29910

Send payment To:

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 P.O. Box 95187
 Las Vegas, NV 89193-5187



DATE	TRANSACTION	AMOUNT	BALANCE	Check #
	Balance Forward:		0.00	
11/30/2018	Start Up Balance - Prior Manag	11,877.11	11,877.11	
1/1/2019	Regime Fee	159.00	12,036.11	
2/13/2019	Owner Fines	50.00	12,086.11	
4/1/2019	Regime Fee	159.00	12,245.11	
4/22/2019	Owner Fines	75.00	12,320.11	
4/22/2019	Owner Fines	75.00	12,395.11	
7/1/2019	Late Fee	123.95	12,519.06	
7/1/2019	Regime Fee	159.00	12,678.06	
7/29/2019	Owner Fines	50.00	12,728.06	
8/9/2019	Atty Admin Fee	25.00	12,753.06	
9/12/2019	Legal Owner	172.05	12,925.11	
9/20/2019	Atty Admin Fee	25.00	12,950.11	
9/23/2019	Atty Admin Fee	45.00	12,995.11	
10/1/2019	Regime Fee	159.00	13,154.11	
10/10/2019	Legal Owner	1,101.00	14,255.11	
11/1/2019	Atty Admin Fee	25.00	14,280.11	
11/5/2019	Owner Fines	50.00	14,330.11	
11/11/2019	Legal Owner	518.12	14,848.23	
11/19/2019	Atty Admin Fee	25.00	14,873.23	
11/19/2019	Owner Fines	75.00	14,948.23	
11/19/2019	Owner Fines	50.00	14,998.23	
11/29/2019	Owner Fines	100.00	15,098.23	

FOLD ON PERFORATIONS, DETACH COUPON, AND RETURN IT WITH YOUR PAYMENT

Date Paid: _____
 Check #: _____

Family Trust Sun
 18 Sixth Avenue
 Bluffton, SC 29910

Account Number	Payment Due By
46904	
Amount Due	Amount Enclosed
17,961.28	

Make checks payable to your association
 Detach and return this portion with your remittance

Property: 18 Sixth Avenue
 Bluffton, SC 29910

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 P.O. Box 95187
 Las Vegas, NV 89193-5187

In accordance with the rules of the National Automated Clearing House, information from the check sent with this payment may be used to create an electronic debit to your account. The electronic debit on your statement is valid as proof of payment.

0788 000413 0000000000046904 SUN000000000 796128 0

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 2 Corpus Christi, Suite #302
 Hilton Head Island, SC 29928

Phone: 843-785-4775

Account Number	Statement Date
46904	7/9/2020
Due Date	Amount Due
	17,961.28

Make checks payable to your association

Send payment To:

Family Trust Sun
 18 Sixth Avenue
 Bluffton, SC 29910

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 P.O. Box 95187
 Las Vegas, NV 89193-5187

DATE	TRANSACTION	AMOUNT	BALANCE	Check #
12/11/2019	Legal Owner	77.50	15,175.73	
1/1/2020	Regime Fee	159.00	15,334.73	
1/17/2020	Legal Owner	656.70	15,991.43	
3/2/2020	Payment	-636.00	15,355.43	1626
3/2/2020	Payment	-636.00	14,719.43	52
3/17/2020	Atty Admin Fee	25.00	14,744.43	
3/18/2020	Legal Owner	1,420.48	16,164.91	
3/18/2020	Legal Owner	370.55	16,535.46	
4/1/2020	Association Fee	159.00	16,694.46	
4/7/2020	Legal Owner	17.00	16,711.46	
5/14/2020	Legal Owner	104.00	16,815.46	
5/30/2020	Late Fee	166.92	16,982.38	
6/11/2020	Owner Fines	50.00	17,032.38	
6/12/2020	Legal Owner	338.10	17,370.48	
6/26/2020	Owner Fines	50.00	17,420.48	
6/26/2020	Owner Fines	50.00	17,470.48	
6/30/2020	Late Fee	171.80	17,642.28	
7/1/2020	Association Fee	159.00	17,801.28	
7/9/2020	Bluffton Hearing Fee	160.00	17,961.28	

FOLD ON PERFORATIONS, DETACH COUPON, AND RETURN IT WITH YOUR PAYMENT

Date Paid: _____
 Check #: _____

Family Trust Sun
 18 Sixth Avenue
 Bluffton, SC 29910

Make checks payable to your association
 Detach and return this portion with your remittance

Account Number	Payment Due By
46904	
Amount Due	Amount Paid To Settle
17,961.28	

Property: 18 Sixth Avenue
 Bluffton, SC 29910

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 P.O. Box 95187
 Las Vegas, NV 89193-5187

In accordance with the rules of the National Automated Clearing House, information from the check sent with this payment may be used to create an electronic debit to your account. The electronic debit on your statement is valid as proof of payment.

0788 000413 0000000000046904 SUN000000000 796128 0

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 2 Corpus Christi, Suite #302
 Hilton Head Island, SC 29928

Phone: 843-785-4775

Account Number	Statement Date
46904	7/9/2020
Due Date	Amount Due
	17,961.28

Make checks payable to your association

Send payment To:

Family Trust Sun
 18 Sixth Avenue
 Bluffton, SC 29910

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 P.O. Box 95187
 Las Vegas, NV 89193-5187

DATE	TRANSACTION	AMOUNT	BALANCE	Check #
------	-------------	--------	---------	---------

Pay This Amount: \$17,961.28

Please send all correspondence or any inquiries on your invoice to:
 IMC Resort Services, Inc
 2 Corpus Christi, Suite #302
 Hilton Head Island, SC 29928

FOLD ON PERFORATIONS, DETACH COUPON, AND RETURN IT WITH YOUR PAYMENT

Date Paid: _____
 Check #: _____

Family Trust Sun
 18 Sixth Avenue
 Bluffton, SC 29910

Account Number	Payment Due By
46904	
Amount Due	Amount Enclosed
17,961.28	

Make checks payable to your association
 Detach and return this portion with your remittance

Property: 18 Sixth Avenue
 Bluffton, SC 29910

Bluffton Park, HOA
 c/o IMC Resort Services, Inc
 P.O. Box 95187
 Las Vegas, NV 89193-5187

In accordance with the rules of the National Automated Clearing House, information from the check sent with this payment may be used to create an electronic debit to your account. The electronic debit on your statement is valid as proof of payment.

0788 000413 0000000000046904 SUN000000000 796128 0

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III Master in Equity
and Special Circuit Judge

CASE NO. 2019-CP-07-02178

JOSEPH CHAKYING SUN as Trustee
of The 2009 Suns Family Trust, and
JOSEPH CHAKYING SUN, Individually Appellants

v.

BLUFFTON PARK COMMUNITY
ASSOCIATION, INC. Respondent

I. FORMAL OBJECTION TO THE CIRCUIT COURT ON SUFFICIENCY OF
SURETIES; and
II. PARTIAL RETURN ON MOTION FOR CONSIDERATION ON ALREADY FILED
PETITION FOR WRIT OF MANDAMUS

COMES NOW, Respondent Bluffton Park Community Association, Inc. (hereinafter, "Plaintiff/Respondent") and files its 1) Formal Objection to the Circuit Court on Sufficiency of Sureties; and 2) Partial Return on Motion for Consideration on Already Filed Petition for Writ of Mandamus, and would respectfully show the following unto this Honorable Court.

I.

On April 18, 2021, Plaintiff/Respondent received First Notice of Appeal via e-mail. See e-mail and Notice of Appeal, and the corresponding Certificate of Service purporting to serve via e-mail on April 16, 2021 attached hereto as Exhibit "A". Thereafter, on April 27, 2021, nine days after receipt of the Notice of Appeal, Plaintiff/Respondent notified Mr. Sun and the Honorable Marvin H. Dukes, III, Master in Equity for Beaufort County, South Carolina via e-mail that it was objecting to the sufficiency Defendant/Appellants' sureties. A formal objection was not filed with the Court at that time because undersigned counsel had not received notice that Appellants had filed their appeal with the Court of Common Pleas, the result of which is that the Court of Common

Pleas did not have jurisdiction over the appeal or this matter, and because no sureties were actually named. A copy of the April 27, 2021 e-mail is attached hereto as Exhibit "B". On the date hereof, Plaintiff/Respondent learned of the filing of said Notice of Appeal on April 20, 2021 thereby giving this Court jurisdiction over the matter.

Defendants/Appellants JOSEPH CHAKYING SUN as Trustee of The 2009 Suns Family Trust, and JOSEPH CHAKYING SUN, Individually (hereinafter, collectively "Defendants/Appellants") in filing their appeal failed to comply with the provisions of S.C. Code Ann. § 18-9-10 et seq. Specifically, Defendants/Appellants have failed to comply with the following requirements:

1. Execution of a written undertaking, with two sureties, that during possession of such property by the appellants they will not commit or suffer to be committed any waste thereon and that they will pay rental value of the property if the appeal is unsuccessful. S.C. Code Ann. § 18-9-170;
2. Service of the written undertaking with the Notice of Appeal. S.C. Code Ann. § 18-9-200; and
3. Failure to provide affidavits of two sureties with a written undertaking that they are each worth double the amount specified therein. S.C. Code Ann. § 18-9-210.

For these reasons, Plaintiff/Respondent files its Formal Objection to the Circuit Court on Sufficiency of Sureties pursuant to S.C. Code Ann. § 18-9-210.

II.

On April 30, 2021 Plaintiff/Respondent received a copy of Defendants/Appellants' Motion for Consideration on Already Filed Petition for Writ of Mandamus, a copy of which is attached hereto as Exhibit "C" along with the corresponding email transmitting it.¹ Among the relief requested in said motion is for a stay of execution of the Order granting foreclosure. Plaintiff/Respondent would respectfully show that Defendants/Appellants are not entitled to such relief and in fact should have the Appeal as to the foreclosure dismissed.

As grounds therefor Plaintiff/Respondent points to SCACR Rule 241. While stays are normally automatic under SCACR 241(a), in cases of foreclosure there are exceptions thereto listed in SCACR 241(b). One such exception as listed in SCACR 241(b)(4) which pertains to foreclosures and sales of land. Said section specifically cites S.C. Code Ann. § 18-9-170. Under SCACR 241(b) all exceptions and prerequisites must be strictly complied with.

Defendants/Appellants specifically failed to comply with S.C. Code Ann. § 18-9-170 by failing to make an undertaking and offer sureties, among other things. Furthermore, pursuant to S.C. Code Ann. § 18-9-200, any undertaking or surety offering under S.C. Code Ann. § 18-9-170 "must be served on the adverse party with the notice of appeal".

¹ Note the Certificate of Service purporting to have e-mailed it to the undersigned on April 27, 2021.

Defendants/Appellants' Notice of Appeal did not contain any undertaking or promise, nor offer any surety as served upon the undersigned or filed with the Clerk of Court for Beaufort County, South Carolina. Accordingly, there can be no stay of the foreclosure sale.

LAW OFFICE OF SCOTT M. WILD, LLC

By: s/Scott M. Wild
SC Bar # 76528
Attorney for the Respondent
Post Office Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
scott@wildlawfirm.com

This 30th day of April, 2021,

Hilton Head Island, Beaufort County, South Carolina.

EXHIBIT “A”

to the Formal Objection to the Circuit Court on Sufficiency of Sureties and Partial Return
on Motion for Consideration on Already filed Petition for Writ of Mandamus in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun’s Family Trust in South Carolina, et al.

(2019-CP-07-02178)

Scott Wild

From: jossunn1095@yahoo.com
Sent: Sunday, April 18, 2021 1:30 AM
To: hmcleod@bcgov.net; Scott Wild; Marvin Dukes
Subject: Beaufort County Court of Common Pleas Case No. 2019CP0702178
Attachments: Notice Appeal.pdf

Please accept this service copy by email.
Joe Sun

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes III, Master in Equity
and Special Circuit Court Judge

CASE NO. 2019-CP-07-02178

JOSEPH CHAKYING SUN as Trustee
of The 2009 Suns Family Trust, and
JOSEPH CHAKYING SUN, Individually Appellants

v.

BLUFFTON PARK COMMUNITY
ASSOCIATION, Inc. Respondent

NOTICE OF APPEAL

Joseph Chakyng Sun, individually and Joseph Chakyng Sun as Trustee of The 2009 Suns Family Trust, hereby appeal the Order of the Honorable Marvin H. Dukes, III, Denying their Motion to Reconsider, entered on April 7, 2021, a copy of which Appellant Sun received on about April 9, 2021, and the Master’s Decree of Foreclosure, Sale, and Judgement (\$21,115.47) entered on January 13, 2021, a copy of which Appellant received on January 16, 2021, to the Supreme Court of South Carolina.

This Notice of Appeal is being filed at the South Carolina Supreme Court because during the pendency of the case at the Court of Common Pleas, a Petition of Writ of Mandamus and its amendment were filed and served at the Supreme Court, Case No. 2021-000138 addressing the same issues now on appeal in this case. There are several areas in the aforesaid two orders issued at the court of common pleas which Appellant will show to be a deprivation of his constitutional rights to due process of the law and the violation of the South Carolina Rules of Civil Procedure. These matters may be addressed by this court pursuant to SCACR, Rule 203(d)(1)(A)(ii).

Respectfully submitted,

April 16, 2021
Bluffton, SC 29910

JOSEPH C. SUN, pro se
P. O. Box 2543
Bluffton, SC 29910
843-226-8788

Scott M. Wild, Esq.
Attorney for Respondent
P. O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
scott@wildlawfirm.com

CERTIFICATE OF SERVICE

This is to certify that I have this date served the Respondent a copy of this Notice of Appeal, by depositing a copy of same in the U.S. Mail to:

Scott M. Wild, Esq.
P. O. Box 6867
Hilton Head Island, SC 29938

and by email to: scott@wildlawfirm.com

This 16th day of April, 2021.

JOSEPH C. SUN
P. O. Box 2543
Bluffton, SC 29910
843-226-8788

EXHIBIT “B”

to the Formal Objection to the Circuit Court on Sufficiency of Sureties and Partial Return
on Motion for Consideration on Already filed Petition for Writ of Mandamus in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun’s Family Trust in South Carolina, et al.

(2019-CP-07-02178)

Scott Wild

From: Scott Wild
Sent: Tuesday, April 27, 2021 9:57 AM
To: jossunn1095@yahoo.com; hmcleod@bcgov.net; Marvin Dukes
Subject: RE: Beaufort County Court of Common Pleas Case No. 2019CP0702178

Mr. Sun:

Please note that I object to the sufficiency of your appellate undertaking. In particular, it does not exist. My client reserves all other defenses to your appeal, including seeking dismissal, and the right to further object if you actually provide the undertaking.

Sincerely,



Scott M. Wild,
Law Office of Scott M. Wild, LLC
P.O. Box 6867
Hilton Head Island, SC 29938
37 New Orleans Rd. Ste. F (29928)
(843) 785-9453
www.wildlawfirm.com

This firm collects debts for mortgage lenders and other creditors. Any information obtained will be used for that purpose. If you have previously received a discharge in bankruptcy, this message is not and should not be construed as an attempt to collect any pre-petition debt, but only as an attempt to enforce a lien or send you required notices. If you are presently seeking relief in bankruptcy and such matter is pending, please notify this firm immediately using the contact information above.

CONFIDENTIALITY NOTE: THE INFORMATION CONTAINED IN THIS ELECTRONIC MAIL TRANSMISSION MAY BE LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING THIS ELECTRONIC MAIL MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS ELECTRONIC MAIL IN ERROR, PLEASE ACCEPT THIS FIRM'S APOLOGIES, IMMEDIATELY DELETE IT, AND NOTIFY THIS FIRM OF THE ERROR USING THE CONTACT INFORMATION ABOVE.

TAX DISCLOSURE: This office does not give tax advice.

From: jossunn1095@yahoo.com <jossunn1095@yahoo.com>
Sent: Sunday, April 18, 2021 1:30 AM
To: hmcleod@bcgov.net; Scott Wild <scott@wildlawfirm.com>; Marvin Dukes <mdukes@bcgov.net>
Subject: Beaufort County Court of Common Pleas Case No. 2019CP0702178

Please accept this service copy by email.
Joe Sun

EXHIBIT "C"

to the Formal Objection to the Circuit Court on Sufficiency of Sureties and Partial Return
on Motion for Consideration on Already filed Petition for Writ of Mandamus in

Bluffton Park Community Association, Inc.

v.

The 2009 Sun's Family Trust in South Carolina, et al.

(2019-CP-07-02178)

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes III, Master in Equity
and Special Circuit Court Judge

CASE NO. 2019-CP-07-02178

JOSEPH CHAKYING SUN as Trustee
of The 2009 Suns Family Trust, and
JOSEPH CHAKYING SUN, Individually Appellants

v.

BLUFFTON PARK COMMUNITY
ASSOCIATION, Inc. Respondent

MOTION FOR CONSIDERATION ON ALREADY FILED
PETITION FOR WRIT OF MANDAMUS

Appellant Joseph Sun during the pendency of the within case at the Court of Common Pleas filed and served on the respondent, a Petition for Writ of Mandamus addressing the numerous denial of his Constitutional rights to due process of the law. The respondent had not responded to the aforesaid petition. Similarly, it had not responded to all other motions filed by the Appellant at the circuit court. Without a hearing, Special Circuit Judge Marvin Dukes allowed the respondent to include the denial of the motions in its proposed order of Master’s Decree of Foreclosure, Sale, and Judgment (\$21,115.47), a copy of which was attached within Appellant’s Notice of Appeal sent in for filing.

Because there was no hearing held to determine the merits of Appellant's motions, Appellants complained that it was equivalent to the circuit court allowing the respondent to rule on Appellants' motions and enter an order of denial.

According to circuit court's Form 4 order of denial of Appellant's motion for reconsideration, (a copy is attached with the notice of appeal,) no sale of Appellants' property shall occur sooner than 60 days from date of denial on April 7, 2021, or on June 7, 2021.

As it is unlikely that the appeal of this case can be determined prior to June 7, 2021, Appellant Sun is without any other legal remedy to save his home because he has no funds to pay the respondent the sum that it claims or any bonds on appeal. Appellant can show that he does not owe the respondent any money and the judgment was obtained by the respondent using clearly false testimony in its affidavit for publication and several other denial of due process against the Appellants as alleged in the petition with citation of records.

Wherefore, Appellant prays the court that a writ of mandamus issue requiring the respondent and the circuit court to give any reason that Appellant is not entitled to the writ and/or that Appellants' petition should be denied. In the alternative, Appellants pray the court to stay the execution of the Circuit Court orders until the appeal of this case is decided by the court.

Appellant asks this court to accept jurisdiction and determine the merits of his petition and the appeal as all records are already on the record at the Beaufort County Public Index. The determination by this court would save court time and resources. Appellants request to be directed by the court and be allowed to proceed in filing and serving his Appellant's Brief and the records of appeal if deemed necessary by the court.

Respectfully submitted,

This 27th day of April, 2021.

JOSEPH C. SUN, pro se
P. O. Box 2543
Bluffton, SC. 29910
843-226-8788

Scott M. Wild, Esq.
Attorney for Respondent
P. O. Box 6867
Hilton Head Island, SC 29938
(843) 785-9453
scott@wildlawfirm.com

CERTIFICATE OF SERVICE

This is to certify that I have this date served the Respondent a copy of this Motion for Consideration on Already Filed Petition for Writ of Mandamus, by depositing a copy of same in the U.S. Mail to:

Scott M. Wild, Esq.
P. O. Box 6867
Hilton Head Island, SC 29938

and by email to: scott@wildlawfirm.com

This 27th day of April, 2021.

JOSEPH C. SUN
P. O. Box 2543
Bluffton, SC 29910
843-226-8788

Scott Wild

From: jossunn1095@yahoo.com
Sent: Friday, April 30, 2021 12:59 AM
To: Scott Wild
Subject: Re: Beaufort County Court of Common Pleas Case No. 2019CP0702178
Attachments: Motion Consider Petition Mandamus.pdf

This is the second service copy by email. The first copy had to be quarantined

On Tuesday, April 27, 2021, 09:56:58 AM EDT, Scott Wild <scott@wildlawfirm.com> wrote:

Mr. Sun:

Please note that I object to the sufficiency of your appellate undertaking. In particular, it does not exist. My client reserves all other defenses to your appeal, including seeking dismissal, and the right to further object if you actually provide the undertaking.

Sincerely,



Scott M. Wild,
Law Office of Scott M. Wild, LLC
P.O. Box 6867
Hilton Head Island, SC 29938
37 New Orleans Rd. Ste. F (29928)
(843) 785-9453
www.wildlawfirm.com

This firm collects debts for mortgage lenders and other creditors. Any information obtained will be used for that purpose. If you have previously received a discharge in bankruptcy, this message is not and should not be construed as an attempt to collect any pre-petition debt, but only as an attempt to enforce a lien or send you required notices. If you are presently seeking relief in bankruptcy and such matter is pending, please notify this firm immediately using the contact information above.

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TAX DISCLOSURE: This office does not give tax advice.

From: jossunn1095@yahoo.com <jossunn1095@yahoo.com>
Sent: Sunday, April 18, 2021 1:30 AM
To: hmcleod@bcgov.net; Scott Wild <scott@wildlawfirm.com>; Marvin Dukes <mdukes@bcgov.net>
Subject: Beaufort County Court of Common Pleas Case No. 2019CP0702178

Please accept this service copy by email.

Joe Sun