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**Sep 07 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

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

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Appeal Case No. 2021-000434

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BLUFFTON PARK COMMUNITY OWNERS' ASSOCIATION, INC.

v.

JOSEPH CHAKYING 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,

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

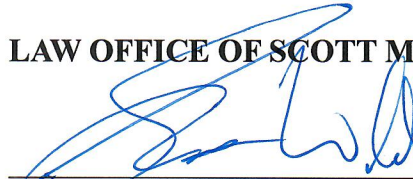
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RETURN ON APPELLANT'S MOTION TO IMPOSE SANCTIONS AGAINST  
RESPONDENT'S FRAUD IN VIOLATION OF SOUTH CAROLINA APPELLATE COURT  
RULE 211(b)

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COMES NOW Respondent, Bluffton Park Community Owners' Association, Inc., who hereby objects and responds to the Motion to Impose Sanctions Against Respondent's Fraud in Violation of South Carolina Appellate Court Rule 211(b) (the "Motion"). By way of a return, every allegation is categorically denied and Respondent would request that this Motion be dismissed with costs as against Appellant. In lieu of this, Respondent would request that Appellant provide with more specificity all examples to which he cites in subparagraph 1 for a more complete response.

**LAW OFFICE OF SCOTT M. WILD, LLC**



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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

***Attorney for Respondent***

This 7<sup>th</sup> day of September, 2022,

Hilton Head Island, Beaufort County, South Carolina.

**RECEIVED**

**Sep 07 2022**

**SC Court of Appeals**

**STATE OF SOUTH CAROLINA  
In The Supreme Court**

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**APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas**

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

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**CASE NO. 2021-000434**

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**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.**

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**CERTIFICATE OF MAILING**

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I, Tracy L. Thornton, hereby certify that on this day I mailed one (1) un-filed copy of the Return on Appellant's Motion to Impose Sanctions Against Respondent's Fraud in Violation of South Carolina Appellate Court Rule 211(b) 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

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

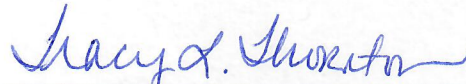
Joseph Chakyng Sun and  
The 2009 Sun's Family Trust  
in South Carolina, USA  
c/o Joseph Chakyng Sun, Trustee  
43 Broadview Drive  
Ridgeland, SC 29936

Additionally, a copy of the same was served by scanned electronic attachment on September 7, 2022 to Joseph Sun and The 2009 Sun's Family Trust in South Carolina, USA to [josunn1095@yahoo.com](mailto:josunn1095@yahoo.com).

Further, a copy of the same was submitted for filing with the South Carolina Court of Appeals via scanned electronic attachment to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted this 7<sup>th</sup> day of September, 2022, in the Town of Hilton Head Island, Beaufort County, South Carolina.

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

By: 

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Tracy L. Thornton, Legal Assistant  
Post Office Box 6867  
Hilton Head Island, SC 29938  
(843) 785-9453  
[tracy@wildlawfirm.com](mailto:tracy@wildlawfirm.com)  
*Attorney for the Respondent*

Sworn to and subscribed before me on  
this 7<sup>th</sup> day of September, 2022.

  
\_\_\_\_\_  
Notary Public for South Carolina

My Commission Expires: 02/08/2028