

**AMENDED MOTION FOR ADDITIONAL EXTENSION OF TIME TO CORRECT
DEFICIENCIES & FILE/SERVE BRIEF AND DESIGNATION OF MATTER**

THE STATE OF SOUTH CAROLINA
In the Court of Appeals
[In The Supreme Court]

RECEIVED

Feb 27 2024

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case # 2022-CP-100-3246

Anthony M. Chayban,

Respondent,

v.

Mary A. Griffith,

Appellant.

**MOTION FOR ADDITIONAL EXTENSION OF TIME TO CORRECT DEFICIENCIES
AND FILE/SERVE BRIEF AND DESIGNATION OF MATTER**

This motion is intended as a formal and additional request for this Honorable Court's grace to correct Appellate Case No. 2023-001649's deficiencies based on my previously and partially-discussed personal circumstances — and other circumstances that have arisen.

I understand that I owe you motion fees, including this motion fee, and that the Court may or may not waive my filing fees based on my indigency proofs. I've just recently gotten moved again. Getting stabilized in my life while still being a crime victim with unresolved issues surrounding these events has been very difficult.

My time-sensitive duty to document and report outstanding criminal matters surrounding the Defendant's and co-conspirators' behavior upon my family and its effects has significantly delayed my progress, along with ongoing incidents that I believe are related affecting my grown son, and affecting my peace and ability to concentrate on my civil documentation.

I've nearly completed a complex fundraiser in demonstrating for viewers the Shawshank Redemption-esque extraction from an ISIS smear campaign and other life effects which must arise for the functionality and safety of my family and me. I am praying this will yield the assistance and advice I need to continue with this kind of endeavor, as the lower court still hasn't heard my LKQ lawsuit, requiring amendment and probably re-filing.

As previously mentioned, I'm diagnosed with Post-Traumatic Stress Disorder and ADHD. In addition to those, and besides the multiple breakdowns/panic attacks I seem to have experienced while making mandatory reports about what was done to us, it came to my attention that my doctor had prescribed me medication for depression (I don't know if I'm diagnosed; I just know that I requested the prescription) that I never had the opportunity to fill because of this. I feel extremely depressed and sluggish with zero of my medications because of the burdens associated with my continual involvement in these conflicts with the Defendant, who could have just paid what he owed in the first place whose greed caused him to commit continual acts of terrorism, including but not limited to those committed upon my family and me in our courts. It's even more depressing when I have to continually review what was done to us, including violent incidents, defamation, egregious betrayals by those my family helped and never wronged, and other traumatic materials on account of the Defendant's refusal to stop lying about my family and me. It's pretty difficult to fight a smear campaign that was accomplished by people who I believe comprise a criminal gang, but who nonetheless are numerous and who have lied or intend to lie about us and/or our activities, while also trying to make reports and document the civil action.

Both my and my son's identities have been compromised, with my son's being verified as totally stolen by Chayban and/or associates back at 324 Howle Avenue. We haven't received the proper help or resolution for those circumstances, despite my grown son's many attempts to report the identity theft to various agencies. It's going to be more work for me to report them both to additional agencies. I also recently experienced fraud/theft of resources I held on a debit card, requiring police reports.

The criminal matters which surround the events described in this civil action remain unresolved. There was only one arrest back in 2021 which required the intercession of our local Spirit-filled minister to finally enact, and justice wasn't done in that action. We still don't have proper protection.

I would love the opportunity to plead the civil matter alongside those efforts, but I'm asking you to please continue to consider the extra burdens to me.

My son isn't doing well, in my opinion, following several terrorist incidents. There was a recent incident wherein my son kept me up all night because he heard activity in the backyard. Police came and said there was nobody there. Thereafter, it turned out that my son's neighbor's home was broken

into instead. That incident/break-in was a few weeks ago and doesn't account for the incidents over this past week and weekend.

While not wishing to overburden the court, I believe some religious material (and not the self-righteous type) is relevant to this action and want to include it along with other information I believe will be helpful to the government and the public.

I'm asking that the Honorable Court would please continue to consider the vast discrepancy in material resources between the Defendant, at least a multi-millionaire, and me.

Despite your previous and much-appreciated extension of time to pay the \$250.00 appellate filing fee, if not waived, and all of my outstanding motion fees. I need a little more time for my brief and designation of matter, please.

I understand that I previously mentioned that I would re-file if the prior extension wasn't enough, and I'll do that if I have to, but I want to make every effort to resolve the issues at this level because I believe we can easily do so with a little more grace. I need a little more time to correct my deficiencies, please. I will amend this motion to include more evidence if my case isn't closed.

Thank you for your previous grace, and for your consideration of the extenuating circumstances.

February 27, 2024

A handwritten signature in black ink, appearing to read 'Mary A. Griffith', written over a horizontal line.

Mary A. Griffith
Post Office Box 50
East Freetown, MA 02717
(678) 922-5840

John Dodds

From: tony chayban <tonychayban@yahoo.com>
Sent: Wednesday, June 19, 2019 3:19 PM
To: John Dodds
Subject: Re: Water's Edge Homeowners Association, Inc.

Hello Mr.Dodd

This is to respond back to your letter.

I need to set up an appointment with the board to explain my situation. I have a room for me and a room for my daughter, I live between California, NY and South Carolina. I rent the rooms to my friends and sometimes I rent my room on Airbnb if I'm away.

I have over \$3000 in cost between mortgage, taxes, insurance, solar, electric bill, water, maintenance...etc. I need the help with some renters income. I can not rent it to a family because the kids will ruin the house and the neighborhood. My friends all go to work from morning, they come back to sleep. I'm paying double the taxes, the insurance and all the dues. I need to explain to someone. We do not cause any harm to anyone, those 2 ladies who are complaining tell them wait until I put bunch of kids running around making all kind of noise and see if they like it. I don't want families there because they will ruin the area. If that's what HOA want, I will but it is going to take me at least 6 months to accomplish that. Is there anyway I won't be part of HOA, because they don't do anything for us, I just spent over \$2000 cleaning the water behind.

Why don't they worry about those people who are alcoholics, druggies and criminals. I'm barely making it to keep my head above water. I would sell the house and leave, but it costed me thousands of dollars in closing cost and fees, I will loose a lot of money if I sell now.

We are good working people, we are not harming anyone. What does it make a difference? A dad, a daughter and couple friends live together. We consider ourselves family too.

Please let me know

Thank you for your time

Tony Chayban

Sent from Yahoo Mail for iPhone

On Thursday, June 13, 2019, 1:02 PM, John Dodds <john@cisadodds.com> wrote:

Mr. Chayban: Attached is my letter this date on behalf of Water's Edge Homeowners Association, Inc., the original of which has been mailed to Michael Nelms as Registered Agent for MSCT, LLC which owns the residence at 2170 Country Manor Drive. Should you or your legal counsel wish to discuss this matter further, please do not hesitate to contact me. Sincerely, John Dodds.

1

EXHIBIT
A

This is a screenshot of Exhibit A from case #2019CP1003948 wherein, I believe, Chayban was also operating an illegal AirBnb in Mt. Pleasant, aside from his continual violations of Waters' Edge HOA covenants. This is being used to demonstrate that Chayban lies in many contexts, besides other evidence I have of other contexts. It is not better evidence than we have, but instead what I could quickly access, as I was recording it for other purposes.

EXHIBIT 1

Overview · **Reviews** · The Host · Location · Policies

1 night minimum stay

Clear dates

September 2019							October 2019						
Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7			1	2	3	4	5
8	9	10	11	12	13	14	6	7	8	9	10	11	12
15	16	17	18	19	20	21	13	14	15	16	17	18	19
22	23	24	25	26	27	28	20	21	22	23	24	25	26
29	30						27	28	29	30	31		

33 Reviews

Search reviews

- Accuracy
- Location
- Communication
- Check-in
- Cleanliness
- Value



Mary Katherine
August 2018

Michael was extremely welcoming and hospitable. **One of the most comfortable beds I've slept in.** Check in was a little hectic—the room wasn't ready until about 7:00 and check in was at 3:00. Otherwise very nice stay and delightful people



Tim
March 2019

... up my bag and move it back in forth when I was going and coming. I wish I would've read the reviews more closely as to I have seen many others have had these same issues. **I can't see myself staying at this property again.** It came across more as like a hostel type environment. Read more



Caroline
July 2018

I wouldn't recommend staying here. There are about 5 people living in the house and none of them are related in any way. It's like a circus there at all times. Everything was late getting ready and the house is just creepy. The only thing about the house that was clean were the bed sheets.



Fares
June 2019

<https://www.airbnb.com/rooms/26338702?location=Mt%20Pleasant%2C%20SC%20...> 7/23/2019

This is a screenshot of a single page of Exhibit B from case #2019CP1003948 wherein the Defendant herein was sued by Waters' Edge HOA in Mt. Pleasant, South Carolina, for violating their private covenants in operation of what I believe was another illegal AirBnb. As you can see, aside from the fact that Chayban was lying about his AirBnb participation in that case, the reviewer named Carolina specifically mentioned that Chayban's Exhibit A statement above was untrue. Chayban and cronies thought they could bully us because we didn't have a lot of resources (largely because of them) or an attorney how the Mt. Pleasant HOA had in 2019.

EXHIBIT 2



Regardless of whether we can immediately, or ever, prove any collusion with Chayban, this is, in my opinion, far too many terrorist and/or violent incidents against my son during a short, recent time. I do not believe there should be this many incidents upon anyone anywhere in our country. This was one of many contacts made by my son surrounding incidents this past weekend.

EXHIBIT 3

CHARLESTON COUNTY SHERIFF'S OFFICE
STATEMENT

OCA # 2021-007042

DATE 06/05/21

STATEMENT OF Tristen Nesbitt
ADDRESS 324 Houck Ave, Charleston SC PHONE # 843 925 5353
EMPLOYER: [REDACTED] PHONE # _____
RACE: White SEX: Male DATE OF BIRTH: 12-21-97

When I was in the down the hallway from my room to the kitchen, Tony quickly followed me to ^{walking} kitchen ^{is attempting} in an attempt to scare me. I ignored him altogether. Tony then ^{he} grabs a kitchen chair in a very gregarious manner and walks to the thermostat in the hallway. Shortly thereafter, I finished cooking and began my walk to my room, I then went back to the kitchen to retrieve my water. On my way to the kitchen, I noticed the thermostat was set at 75° on the heat setting. ~~I promptly~~ This has been an ongoing harassment technique by Tony since he has been here. I promptly went to change the thermostat to cool/AC at room temp. As I had my hand on the thermostat, he came down the hall and slapped my right forearm ~~before~~ saying a word. Then, he proceeded to "box me out" from the thermostat and yelling derogatory terms to myself. I told him I was calling the police and ran down to my room. Once I called the emergency number, the operator asked me to separate from Tony at all costs. I walked to the street in front of ~~324~~ 24 Houck Ave and began facing to and fro the front door. When I got off the phone with the operator, and was standing on the front porch, Tony began threatening me again with 200 Arab people that would wipe out my family even after being told vehemently to walk ^{down} towards me and talking to me ^{together} altogether. He would not stop even ^{stop} after multiple pleas. Very soon after that, local law enforcement arrive on scene

I HAVE READ (HAD READ TO ME) THE FOREGOING STATEMENT WHICH HAS BEEN FREELY AND VOLUNTARILY MADE BY ME AND IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

WITNESSES: [Signature]

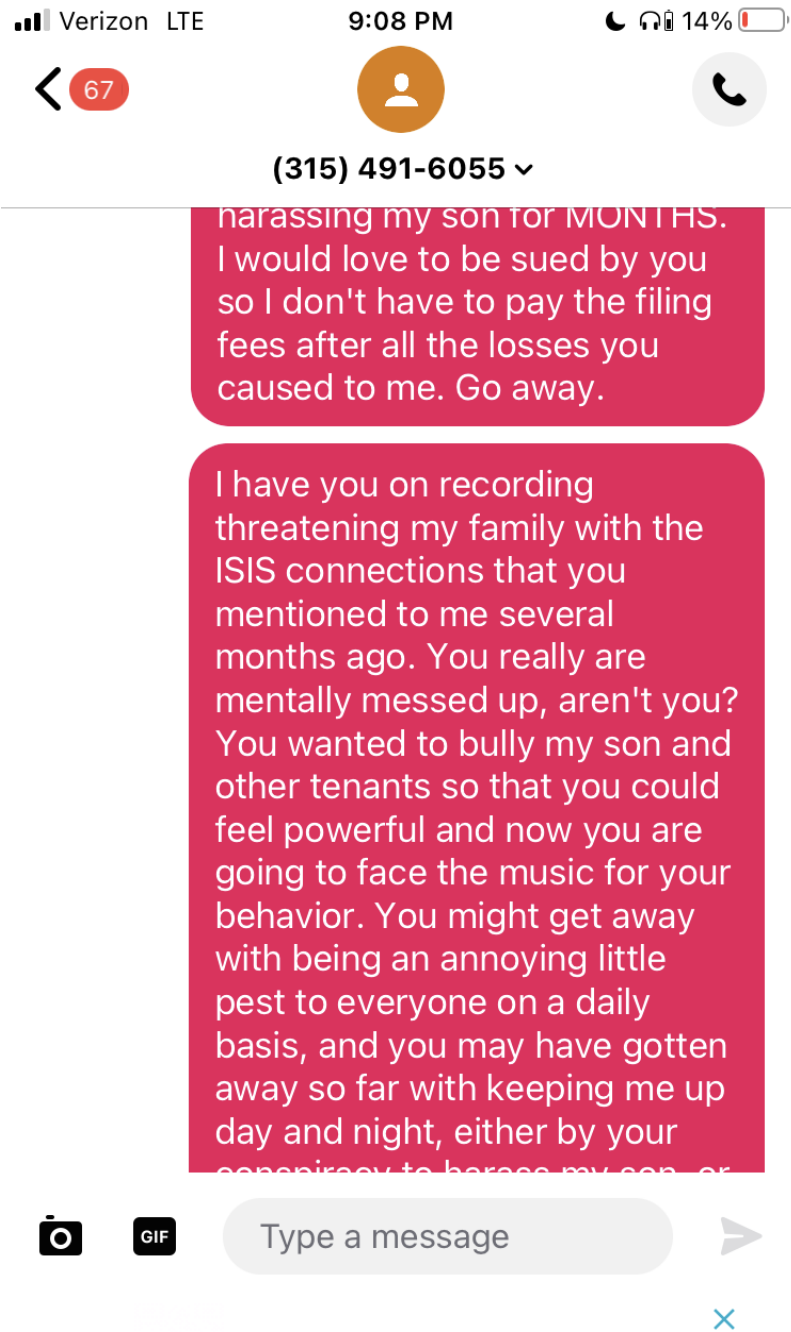
[Signature]
Signature

I HAVE RECEIVED A COPY OF THE ABOVE STATEMENT

[Signature] 11176

This is a partial statement by my son surrounding the only 2021 arrest amid at least dozens of violations, including violent incidents which are still being reported. I've clarified with my son that he incorrectly used the word "gregarious" which he did not know had any positive connotation. He meant "aggressive."

EXHIBIT 4



This is my 2021 response to part of Chayban's 2021 harassment. He was repeatedly also told not to contact me besides this outburst surrounding his trying to terrorize me back to remediate tenant issues he himself caused, but continued to do so in the following years nonetheless, and regardless of the "no contact" order.

EXHIBIT 5

Not Classified By Court

SOPHIA J VAN DOREN

Other

TONY CHAYBAN

Court Documents

Court documents are not available for this case.

Docket Entries

07/16/2020

Hearing

Type: Hearing re: Request for Civil Harassment Restraining Orders .;
Location/Courtroom: Department S101;...

[Read More](#)

07/16/2020

Someone else evidently needing/requesting protection from Chayban in 2020 in Riverside County, CA

EXHIBIT 6



This is one of several images of the squeaky-clean condition of the back house at 324 Howle Avenue, and one of several more of the entire property in clean condition following my efforts as described in this lawsuit. I don't believe I even charged for supervising the new floor installation or transporting the laborer for free daily for a number of 2020 weeks, morning and afternoon, to complete a number of tasks.

EXHIBIT 7



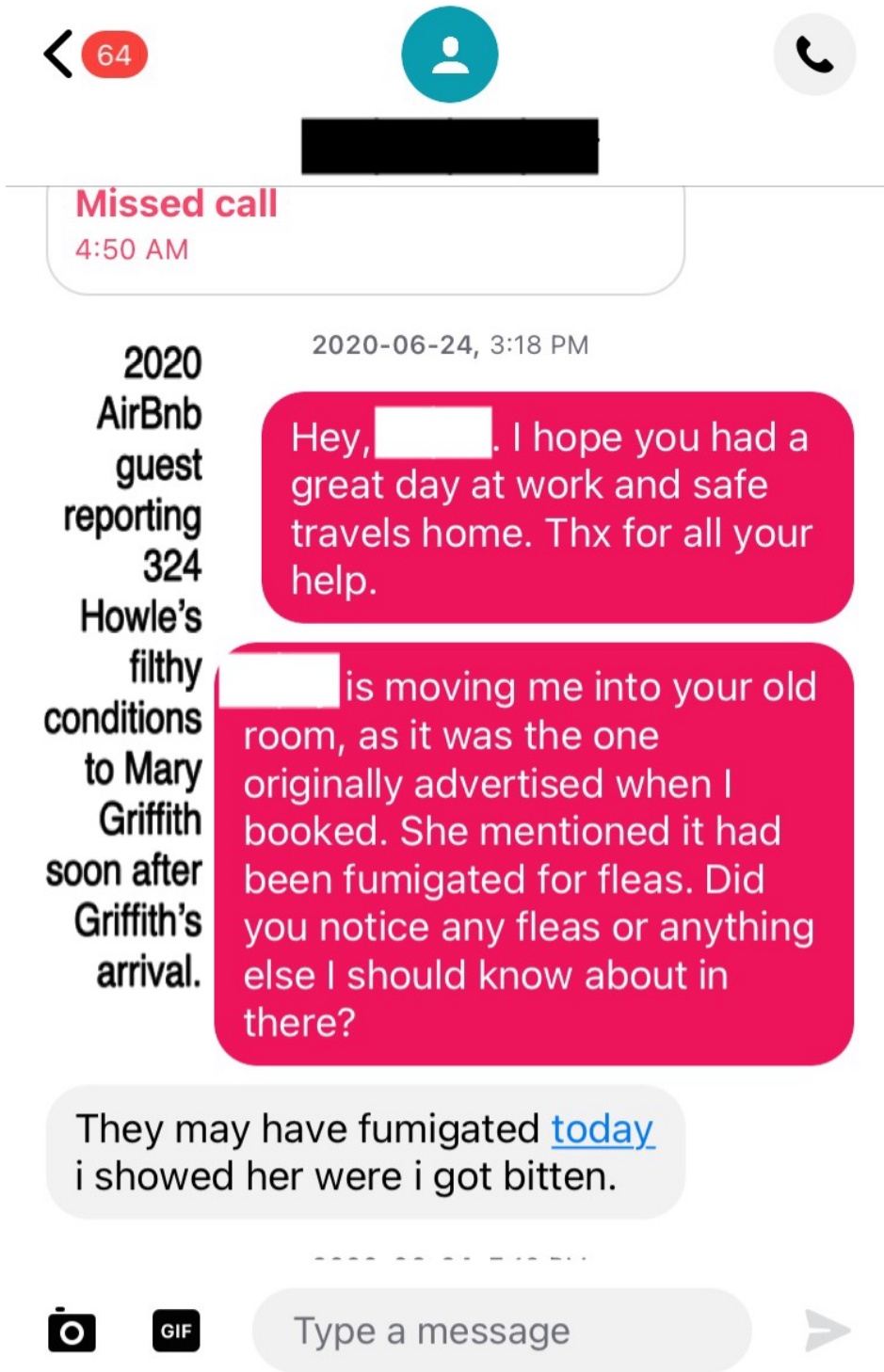
324 Howle Avenue's back house in 2020 following my efforts as described in the lawsuit

EXHIBIT 8



Chayban repeatedly pretended to agree to convert 324 Howle Avenue into a recovery ministry after my weeks of nagging in the fall of 2020, but refused to stop being greedy and cease illegal AirBnb operations, aligning with Michael Beavers instead and trying to unfairly profit from my hard work.

EXHIBIT 9



Missed call

4:50 AM

2020-06-24, 3:18 PM

2020
AirBnb
guest
reporting
324
Howle's
filthy
conditions
to Mary
Griffith
soon after
Griffith's
arrival.

Hey, [redacted]. I hope you had a great day at work and safe travels home. Thx for all your help.

[redacted] is moving me into your old room, as it was the one originally advertised when I booked. She mentioned it had been fumigated for fleas. Did you notice any fleas or anything else I should know about in there?

They may have fumigated today i showed her were i got bitten.

Sorry about my notes. I have the originals.

EXHIBIT 10

(315) 491-6055 v

@ Xd @ think they are old and not alive, but let's check anyway.
Remember if the rooms are not filled, it will take away from your profit.
Is Sally still at th

@ Xd @e small house?
As soon as you get 2 men around, have them put the big fridge inside.
They also complained about having a table to eat, if you can put th

@ Xd@ e dining table there for them now .
Leah eventually is going to take her furniture, God knows when she would give up...I need a prayer from you for a sol

Filthy slumlord Tony Chayban still trying to coerce Griffith to return a cockroach-infested refrigerator to tenant area inside.

Tony's poor discernment caused 9/8/20 security incident w/ Leah + put bull.

EXHIBIT 11

< 54



(315) 491-6055 v



Tony made prior statement about this, indicating his negligence having caused the ruckus.

2020-09-08, 10:24 AM

Pit bull

*I was later forced to relocate to Room 3 because Tony never changed the locks after this — a move I don't even recall whether I charged for.

Leah arrived drunk and belligerent this morning saying she was getting her things but having no way to do so and locking herself into room 3 with her dog. I am texting shamus about changing the locks on 3 when she goes out w the dog again. She is claiming she and the dog live here. ← false statements, police standoff

Someone checking out anyway

She claimed she needed to inspect the cabin until she found out there were guests in there. I took the key from them since they aren't out yet and am going to my storage unit to breathe. She is bothering my PTSD. She is toxic. If she came to get her stuff she would have a car or truck and let us know



GIF

Type a message



EXHIBIT 12

< 54



(315) 491-6055 ✓

Tony Chayban is so greedy and cheap that he harassed Mary Griffith for AT LEAST a month & a half trying to force or manipulate Griffith into returning a roach-infested 'fridge to tenant area. Griffith replaced it w/ a small 'fridge which was NOT sold to Tony by "Mike" as Tony claimed.

2020-07-16, 12:59 AM

I am finishing up cleaning the cabin. The inside of the refrigerator is infested with bugs. Luckily, it doesn't look like anyone used it. Tons start running when it's opened. I am putting tape and an out of order sign until we can resolve. Orkin can re-service since they claimed they did a full service on the back house also. I saw a bug run by [redacted] room and 1 in mine earlier. Maybe they need to re-service the entire house ASAP. Sorry to bother you. I can call them if needed. I worry these people will need the fridge.

2020-07-16, 11:29 AM



Type a message



One of dozens of text messages documenting my arrangement for and supervision of various pest control resources in remediating Defendant's pre-existing issues

EXHIBIT 13



(315) 491-6055 ▾

2020-08-27, 12:34 PM

Griffith to Chayban: trying to obey Charleston County short-term stay laws she isn't yet aware of. Griffith didn't smoke or allow smoking inside, and Chayban, a pathological liar, knows it.

Did you read the review for [redacted]? You have got to start being more discerning. We can rent that room to many people. Someone is coming to look this afternoon.

It says he smoked in a non-smoking space. I do not want ANY DRAMA at all from choosing the wrong people. I wanted to ask him a few questions first.

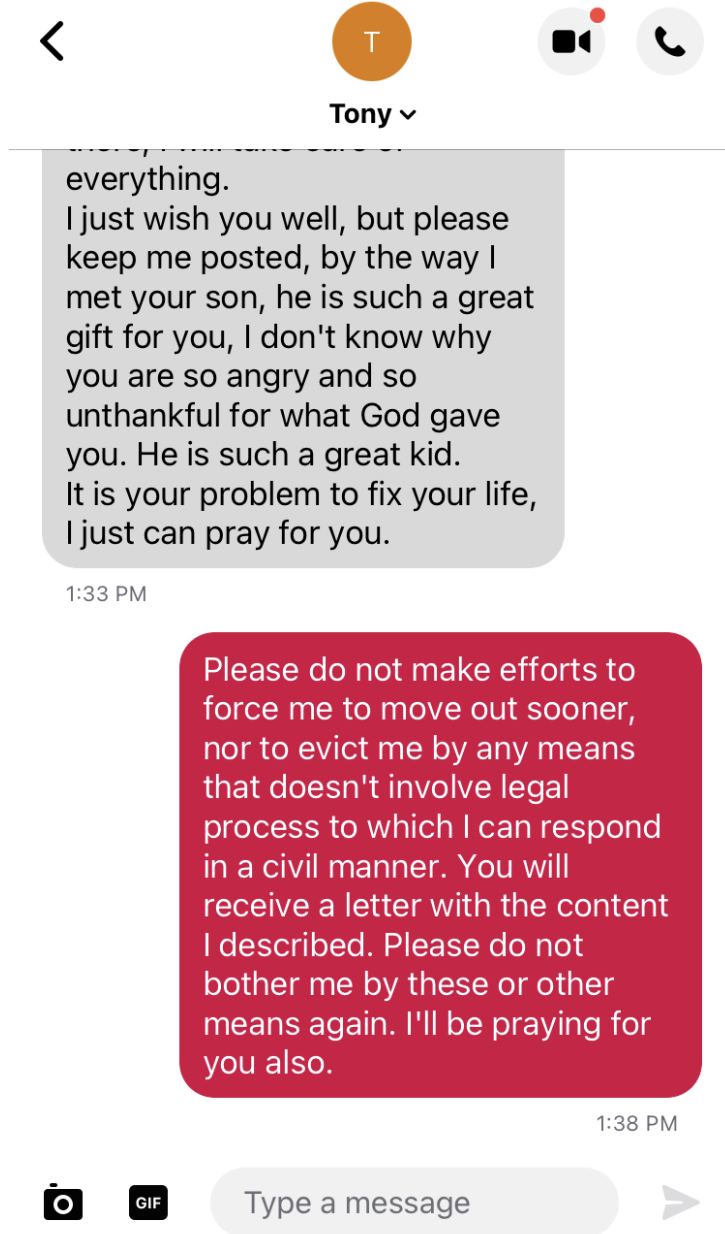
I am trying to only rent to people in the large house that will be 6+ months. I should have blocked out every room while I arranged that, evidently. This is nuts.



Type a message



EXHIBIT 14



Chayban lied in his terroristic lower court pleading; he did not give me 30 days' notice in the 2020 illegal ouster because he is so greedy and demanded a high turnover due to his illegal STR addiction, which I was refusing to assist with before I even knew they were banned locally. Chayban is bullying and terrorizing me above for refusing illegal STRs and forcing him to make 324 Howle Avenue reasonably habitable. He's even terrorizing me with his then-glowing remarks about my son (he's lying about him, too) by alleging I'm unthankful and saying other abusive things to my son and me (besides just this) that he had no business saying. He emotionally, psychologically, financially, and religiously abused us the entire time.

EXHIBIT 15

SEP 18, 2021 AT 1:33 PM

Hanging in there. I am sorry things are not optimum right now, but I believe they will be moreso in the future. Keep your head up.

I have not been telling people where I am because Tony is stalking my family and trying to take down our lives/mission. We have ongoing litigation. He has stalked my son on video repeatedly. There is a video of him claiming Isis ties. He threatened my family with 200 Arabs he claimed were coming to kill us. My son has had health problems as a result of

EXHIBIT 16

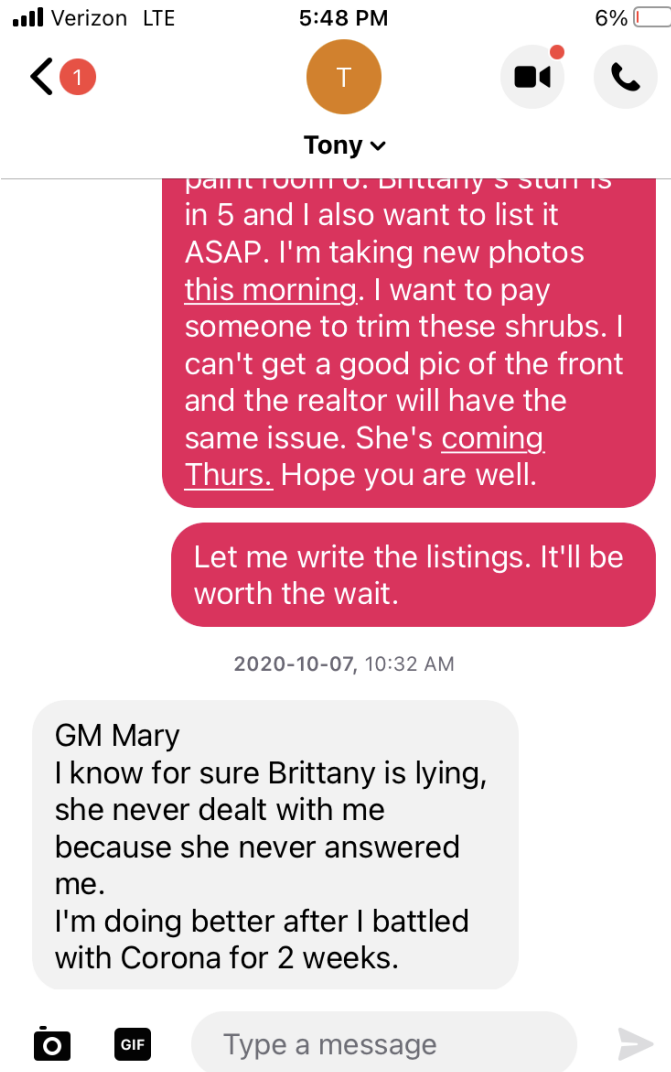
I was just trying to give you some dick girl if you got f***** really good you probably lose some of that attitude and some of that anger but you just won't let yourself do it you're in your own way. You're beautiful and sexy and you're crazy as hell I know you need it I know it's good I can't f*** with you if you don't let me



I just trying to give me some dick you ain't gonna bring God and everybody else into it

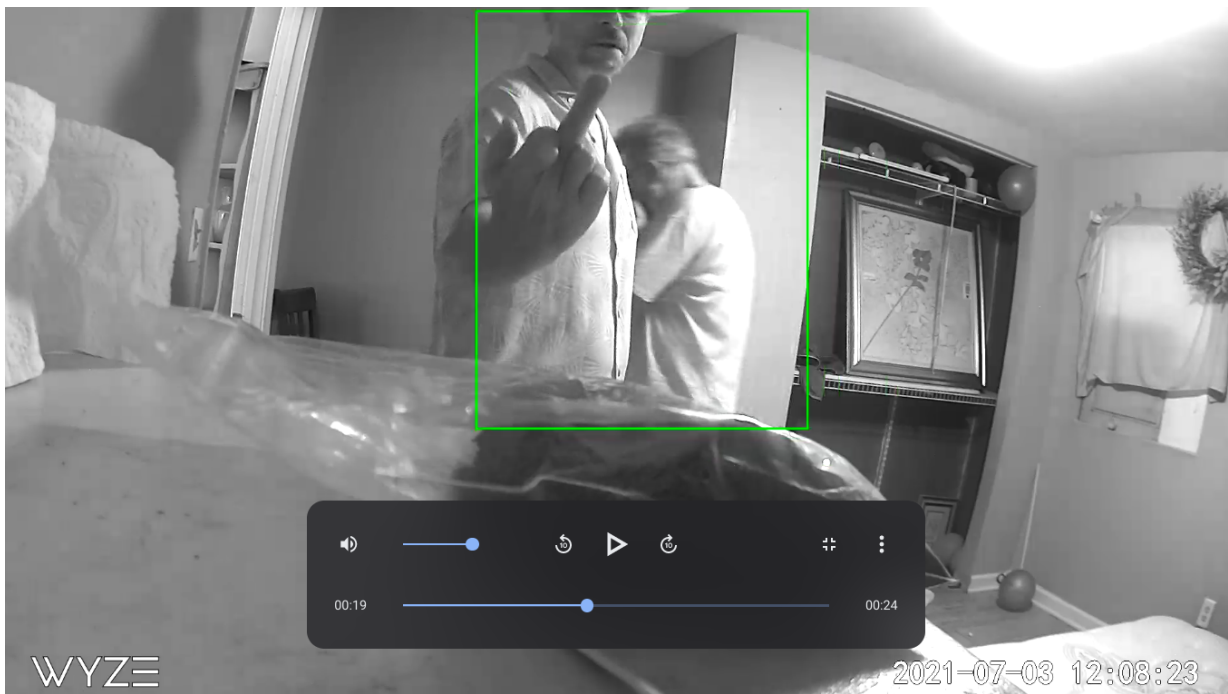
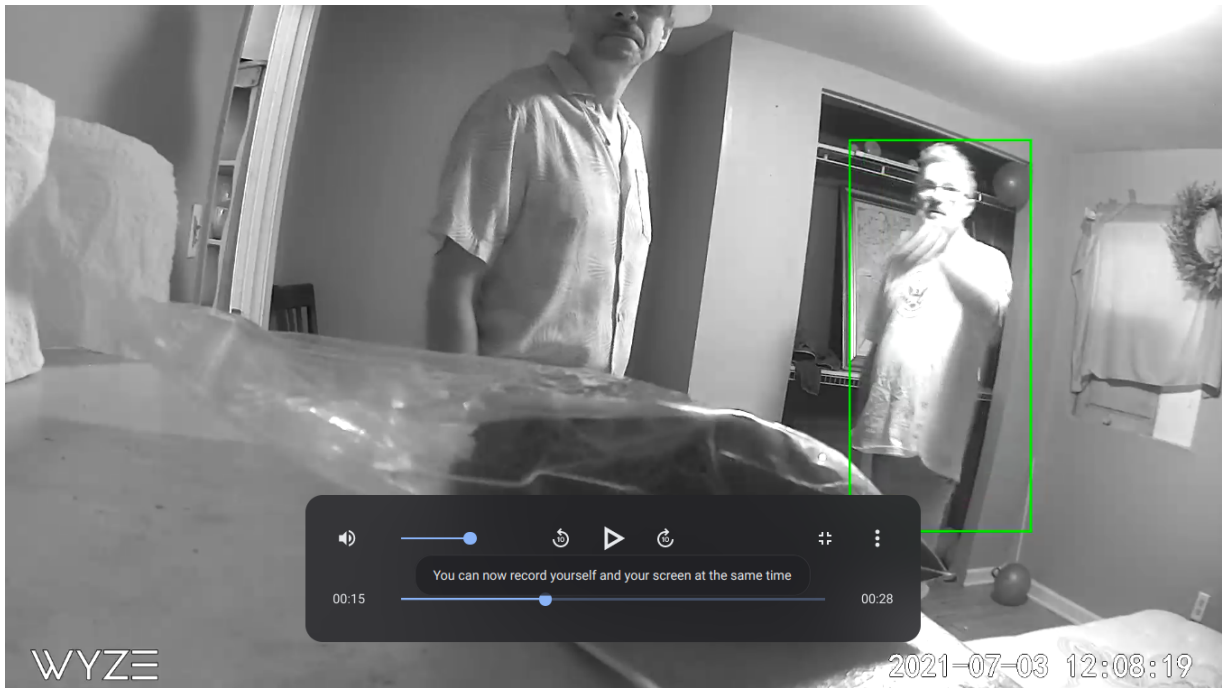
This is how I was treated by someone (from Exhibit 16) that we tried to help, and who previously admitted to intentional 2020 relapses in helping to destroy my budding Christian ministry. He wouldn't even give me \$20 for fuel to court to file my 2022 lien after admitting to yet another relapse and then treating me like this while knowing Chayban was terrorizing us, and following his initial refusal to help with labor after indicating he would help me with labor.

EXHIBIT 17



Chayban didn't end up liking my listings because they were too honest for him (for example, describing the cabin as "shanty"). I was taking the referenced photos in efforts at long-term rentals. Chayban told me that Beavers, the realtor, was taking photos and was threatening to sell the house because I didn't immediately snap my fingers and finish the work and find long-term tenants. He was threatening to sell due to his greed. I had no idea Beavers and Chayban planned on stealing my work at that time. I believed that, instead, I would find recovery tenants and Chayban would lay off his demands to sell. That didn't happen because greedy Chayban refused to stop sneaking and/or pressuring me to participate in what I now know were illegal STRs. Brittany is a 2020 guest Chayban forced in off AirBnb whom I did not approve of, and who lied to Chayban and didn't pay him. She's probably one of the guests Chayban is threatening me with in the lower court. Brittany's family are witches, according to Brittany, and heavily involved in the occult. Brittany pranced around the 324 Howle Avenue front house wearing red lingerie and leaving beer cans in the womens' restroom trash in violation of the rules. Brittany has no knowledge of work I did one way or another. I removed Brittany's property, and subsequently she agreed to leave with it, under boarding house laws prohibiting payment deception in 2020, events for which Brittany probably has a vendetta against me.

EXHIBIT 18



This are screenshots from a full video of Tony Chayban and cohort “realtor” Michael Beavers breaking in/trespassing into my son’s room on 7/3/2021 after Chayban lied in court and told it he would leave my son alone if his criminal assault bond conditions were amended. Chayban did the same alone on July 1, 2020, in a documented fashion, along with stalking, assaulting, and continually terrorizing my grown son. Beavers has no knowledge of work I did one way or another. Beavers stole, and helped ISIS to steal, my Christian ministry while knowing Chayban claimed ISIS ties (6/16/2021 video notification by me).

EXHIBIT 19



This is one of dozens more photos of the cleanliness of 324 Howle Avenue, and one of several more of this particular room, as I was completing labor in 2020. This is one of several images of Room 1 directly prior to its leasing by Chayban to a long-term tenant. This condition represents my last access to Room 1.

EXHIBIT 20

JUN 18 AT 3:03 AM

Hay this is [REDACTED]. that's kind of why we distance ourself from her as much as possible bc of her harassment and issues but joe does end up visiting her at times a and I let her see my son after she had that I guess mini stroke?? But that was the first time since her false dss call on me and my sister with the number of my sisters case workers number that she went through my sisters clipboard to get.. Elizabeth does indeed have a lot of mental issues .. she's always since I met her verbally attacked me and Even ended up attacking me from behind.. anywho the only thing I could tell you to do is call and get them to take her to the physch ward and inform them she has been having episodes & explain what that is. Unless of course you can find a program.. she has been relapsing on and off the last 3 ish months. I don't know what to do honestly other than that.


JUN 18 AT 3:29 AM

Thank you, [REDACTED] I am really sorry all that happened. I pray you guys are doing well. She actually called police on me for allegedly trespassing, even though I have been silent on a totally different end of the house for hours, since I messaged you guys. They came and asked me and my son questions. Now they are questioning her, and I can hear her yelling at them in a tone that is definitely "worse" than her usual. Do you want me to try to explain her conditions to police if they ask? Do we know what kind of episodes? Is it ok if I say family members mentioned mental health diagnoses, so maybe she can get treatment? 😞 I already mentioned to them that I believed this may be relapse-related, and the unfortunate situation with the owner not being careful enough. She initially blamed the relapses on the unregulated environment here (with the landlord not being discerning enough about other guests), but at some point, every mistake becomes a choice...doesn't it? The house is quiet now with no other alcoholics or addicts since various people filed legal actions. I wish I could support her better, but she keeps turning on me when I try.


This is one of several paper and video/audio evidences of the 6/18/2021 security incident surrounding a resident relapse and other dangerous events. Resident's family's names have been redacted. Resident, intelligent rough to be a trained paralegal who, I believe, knew what was right and refused to do it, lied about us at the lower court after knowing about Chayban's ISIS claims and threats.

EXHIBIT 21

Reviews are written at the end of a reservation through Airbnb. Reviews you've received will be visible both here and on your public profile.



Newshore Ventures

Awesome guest! We hope to host her again!

 **Response from Mary:**
👍👏😊

Private feedback:
Thank you!


August 2022


Barbara Stapleton

Mary was considerate and easy to host. She communicated and was conscientious about following house rules.


Private feedback:
Thank you, Mary!

February 2022



Sofi Antonella

Mary was a good guest. communicative and clean. Will host again. safe travels back home!

January 2022


Allen Garcia

Great communication and left the place beyond clean! I would recommend her to any place!

 **Response from Mary:**
Thanks, Allen! And thanks again for hosting us. :) Mary

October 2021


Wayne Lee

Great lady

May 2021


Wayne Lee

nice person

December 2020



Wayne Lee

mary is a sweet heart. i would love to host her more. welcome vack anytime

November 2020



Tony Chayban

Mary was very nice, super clean, very quiet and she obeyed the house rules! She is welcome in our home again



Response from Mary:

Thank you for your hospitality! God bless.

June 2020



David Schuj

Very courteous would host again



Response from Mary:

Thanks again for the wonderful stay!

June 2020