

This is in in reply to the motion to dismiss.

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In my submission to the Court. I listed the following as legal basis of action:

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SC Court of Appeals

1. South Carolina Code of Laws, Title 33 Chapter 31
2. Wegefild Plantation Association's by-laws, covenants, and policy manual.
3. A Court mandated, binding mediation settlement of 2027 – CP- 22-00563
4. Rule 407 - South Carolina Rules for Professional Conduct
5. Other relevant documents.
 - a. Minutes of Board meetings
 - b. Letters and emails exchanged between parties
 - c. Wedgefild HOA homepage
 - d. Liability for Directors of Nonprofit Corporations by Wimble, Bond and Dickinson
 - e. Photographs

I included all these items as exhibits. I retrieved copies from the Circuit Court and sent them without change or addition, with the exception of exhibit 5. to the Appeals Court and the defendant. I did not include exhibit 5 in my final submission. The last paragraph of respondent's motion is incorrect. I note that he makes no claim that the copies were not sent to him. I cannot explain why the judge did not receive the material that I presented. I did notice that when I went back to get copies, the unnumbered pages in exhibit 6 were in a different order and one page was gone. I am compliant with Rule 10(c).

I am asking the Court to deny the motion to dismiss. Although the form of my submission may deserve criticism, including a misplaced punctuation mark, that should not outweigh the errors in the trial that resulted in allowing the operation of the construction company, along with many other violations, for the last year and the last three years as well, all within the statute of limitations. More that, it should not negate the violations of of Section 830 defendants, including Judge Crosby, acting on behalf of the Board.

Respectfully submitted,

William Steiner
4/24/24

South Carolina Court of Appeals
P O Box 11629
Columbia, S. C. 29211

April 27, 2024

RE: William Steiner v. Wedgefield Plantation
Civil Action No. 2023-CP-22-00410
Appellate No. 2023-001311

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Dear Court.

Enclosed is my reply to respondents' Motion to Dismiss and Proof of Service.

Thank you,


William Steiner



William E. Steiner
 180 Live Oak Ln
 Georgetown, SC 29440-7777

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