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**Dec 20 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Benjamin H. Culbertson, Circuit Court Judge

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Case No. 2023-CP-26-02475  
Ct. App. No. 2024-000440

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Nicholas F. Wilson,

Appellant,

v.

Janet P. Gochenour; Janet P. Gochenour Trustee; James B. Parker; James B. Parker, Sr.; Mary Ann Parker; Kenneth Gregory Moore; R&G Corp. d/b/a Century 21 The Harrelson Group; Patton Development SC, LLC; Flagstar Bank, N.A.; Sonia M. Raymond; Raymond Law Firm, P.A;

Respondents.

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NOTICE OF JOINDER OF PATTON DEVELOPMENT SC, LLC

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The subject of this appeal is the granting of Motions to Dismiss as raised in the lower court by the Respondents Sonia M. Raymond, Raymond Law Firms, P.A., Janet P. Gochenour and Janet P. Gochenour, Trustee. The Respondent Patton Development SC, LLC (“Patton”) was not a moving party in the lower court with respect to the said Motions. Nevertheless, Patton agrees with and supports the correctness of the ruling made by the lower court; therefore, Pursuant to Rule 208(b)(6), SCACR, Respondent Patton joins and adopts by reference the arguments raised

in the briefs filed by the Respondents Sonia M. Raymond and Raymond Law Firms, P.A., for the affirmation of the lower court's ruling.

Respectfully submitted,

*s/ Alexander Hray, Jr.*

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Attorney for Respondent Patton Development SC, LLC

December 20, 2024

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Janet P. Gochenour; Janet P. Gochenour Trustee; James B. Parker; James B. Parker, Sr.; Mary Ann Parker; Kenneth Gregory Moore; R&G Corp. d/ b/ a Century 21 The Harrelson Group; Patton Development SC, LLC; Flagstar Bank, N.A.; Sonia M. Raymond; Raymond Law Firm, P.A;

Respondents.

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PROOF OF SERVICE

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I certify that I have served the foregoing Notice of Joinder of Respondent Patton Development SC, LLC on the following counsel of record using the primary email address listed in the Attorney Information System per order in Appellate Case No. 2020-000447 and, as to Pro se Respondents, via US mail.

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December 20, 2024

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Dec 20 2024

SC Court of Appeals

Via E-file: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

December 20, 2024

The Honorable Jenny Abbott Kitchens  
Clerk of Court  
South Carolina Court of Appeals  
Calhoun Building  
1220 Senate Street  
Columbia, SC 29201

Re: Nicholas F. Wilson vs. Janet P. Gochenour, *et al.*  
Ct. App. No. 2024-000440  
C.A. NO.: 2023-CP-26-02475  
My file number: 6357

Dear Ms. Kitchens:

Being filed herewith is the Notice of Joinder for the Respondent Patton Development SC, LLC along with a Proof of Service.

Very truly yours,

s/Alexander Hray, Jr.  
Alexander Hray, Jr., Attorney

AH  
Enclosure as noted  
cc: All parties of record