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Feb 05 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2025-000127

Alan Nix..... Appellant,

v.

Churchill Park Homeowners’ Association, Inc., McCabe, Trotter & Beverly, PC, “Churchill Park,” MP Morris Law Firm, PA, State Street Holdings, LLC, Mikel Scarborough, County of Charleston, Cedar Management Group, LLC, Lee Jansen, James Thornton, Stephanie Trotter, Christopher Craven, Town of Mt. Pleasant Police Dept., City of Charleston Police Department, County of Charleston Sheriff’s Dept., Kristin Graziano, Scarlett Wilson, Christina Smith, Jeffrey Booker, Mathew Colburn, Bobby Green, Elyssa Rookey, John Cox, Stewart Murphy, Charleston Dorchester Mental Health Center, Nerissa Hardin, Nerissa Hardin’s Supervisor, Amanda Haselden, Julie Armstrong, Patrick Summerell, Rachel Filer, The Discount Real Estate Company, LLC, Navy Federal Credit Union, South State Corporation, Jeffrey Scranton, Laura Westbrook, Anderson Oconee Pickens Mental Health Center, Adam Lambert/Acker, Lambert & Hinton, Nicholas Uricchio, Benjamin Mack, Adams Property Group, LLC, Michael Morris, Butler & College, LLC, Michael Miller, Carolina Real Estate and Investment Group, LLC, Marshall Overton, and James Gosnell, Jr. Respondents

MOTION TO DISMISS OF RESPONDENTS

COUNTY OF CHARLESTON, MIKELL SCARBOROUGH, CHRISTOPHER CRAVEN, COUNTY OF CHARLESTON SHERIFF DEPARTMENT, KRISTIN GRAZIANO, SCARLETT WILSON, CHRISTINA SMITH, JEFFREY BOOKER, MATTHEW COLBURN, BOBBY GREEN, AMANDA HASELDEN, JULIE ARMSTRONG, NICHOLAS URICCHIO, BENJAMIN MACK, AND JAMES GOSNELL, JR.

The Respondents County of Charleston, Mikell Scarborough, Christopher Craven, County of Charleston Sheriff Department, Kristin Graziano, Scarlett Wilson, Christina Smith, Jeffrey Booker, Matthew Colburn, Bobby Green, Amanda Haselden, Julie Armstrong, Nicholas Uricchio, Benjamin Mack, and James Gosnell, Jr. join in and adopt

the Motion to Dismiss filed by Respondents McCabe, Trotter & Beverly, PC and Stephanie Trotter and move this Court to dismiss this appeal. Respondents adopt the basis for dismissal and arguments set forth in the Motion to Dismiss filed by Respondents McCable, Trotter & Beverly, PC and Stephanie Trotter on January 28, 2025.¹

These Respondents respectfully request this Court dismiss Appellant's appeal and award costs and fees associated with the same, including sanctions under Rules 269 and 222, SCACR.²

Respectfully submitted,

McDONALD PATRICK POSTON HEMPHILL & ROPER, LLC

By: s/ Steven M. Pruitt

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ATTORNEYS FOR DEFENDANTS COUNTY OF CHARLESTON, MIKELL SCARBOROUGH, CHRISTOPHER CRAVEN, COUNTY OF CHARLESTON SHERIFF DEPARTMENT, KRISTIN GRAZIANO, SCARLETT WILSON, CHRISTINA SMITH, JEFFREY BOOKER, MATTHEW COLBURN, BOBBY GREEN, AMANDA HASELDEN, JULIE ARMSTRONG, NICHOLAS URICCHIO, BENJAMIN MACK, AND JAMES GOSNELL, JR.

February 5, 2025

Greenwood, South Carolina

¹ Defendants have served Appellant at the address he provided in his Motion to Reconsider as they have no other address for Appellant and in addition have served Appellant via electronic mail.

² To include any costs and attorney's fees of \$2,500.00.

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PROOF OF SERVICE

I certify I have served the Motion to Dismiss of Respondents County of Charleston, Mikell Scarborough, Christopher Craven, County of Charleston Sheriff Department, Kristin Graziano, Scarlett Wilson, Christina Smith, Jeffrey Booker, Matthew Colburn, Bobby Green, Amanda Haselden, Julie Armstrong, Nicholas Uricchio, Benjamin Mack, and James Gosnell, Jr. on all parties/their counsel in this case addressed as follows:

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Greenwood, South Carolina