

**RECEIVED**

**Feb 03 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Justice Jean Toal, Circuit Court Judge

Case No. 2024-001626

Rhonda Meisner, ..... Appellant,

vs.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;  
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.;  
Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA;  
Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC;  
Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and  
John Doe, (1-10), ..... Respondents.

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**MOTION TO DISMISS APPELLANT’S APPEAL**

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Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA move the Court, pursuant to Rules 201 and 269 of the South Carolina Appellate court Rules, for an order dismissing Appellant’s Appeal. This motion is made on the following grounds:.

1. On March 18, 2022, Appellant Rhonda Meisner filed the complaint in this matter.
2. Grant Meisner and Grant Meisner, MD, LLC answered and moved to dismiss on April 6, 2022.

3. Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA answered and moved to dismiss on April 12, 2022.
4. On May 6, 2022, Ms. Meisner filed an amended complaint.
5. Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA answered the amended complaint on May 15, 2022.
6. On December 2, 2022, Chief Justice Jean H. Toal heard the motions of the Defendants in addition to motions filed by other parties in this case.
7. By order dated December 15, 2022, Chief Justice Toal granted the motions to dismiss.
8. The December 15, 2022 Order also disposed of certain motions to dismiss filed by Appellant concerning counterclaims asserted against her by several other parties.
9. Moore Bradley Myers Law Firm, PA was left off the December 15, 2022, order and filed a Rule 59 motion on December 16, 2022.
10. Retired Chief Justice Toal granted the Rule 59 Motion and dismissed the Moore Bradley Myers Law Firm a/k/a Moore Taylor & Thomas, PA a/k/a Moore Taylor Law Firm, PA by order dated December 20, 2022.
11. On December 29, 2022, Appellant filed a Motion to Alter or Amend the trial court's December 15, 2022, Order.
12. By order filed on January 10, 2023, Chief Justice Toal denied Appellant's Motion to Alter or Amend that order.

13. Appellant belatedly filed Notice of Appeal on February 15, 2023, attempting to appeal the January 10, 2023 order.
14. On June 6, 2023, this Court dismissed that appeal as untimely.
15. On July 28, 2023, this Court granted in part the Defendants' motion for costs ordering Appellant to pay \$1,000.00 in attorney's fees.
16. Appellant has failed to remit such payment to the Defendants
17. On December 1, 2023, Appellant filed a Motion to Alter or Amend seeking to have the trial court "clarify the dismissal of the Defendant's Counterclaims against the Plaintiff," and "to prevent further involvement of the dismissed Defendants in the proceedings."
18. By order filed on August 19, 2024, Chief Justice Toal denied that Motion to Alter or Amend.
19. Appellant filed Notice of Appeal from that order on September 23, 2024.
20. Appellants' claims against the Defendants were resolved on December 15, 2022, when the trial court granted their motion to dismiss. Appellant cannot now attempt to again try to appeal that decision.
21. The Defendants are entitled to an order dismissing Appellant's Appeal as a matter of law.
22. The Defendants are further entitled to recover their attorney's fees and costs incurred as a result of this frivolous appeal.

This motion is based upon the pleadings filed in this action, the applicable common and statutory law, and the memorandum filed herewith.

Respectfully submitted,

s/James Edward Bradley

James Edward Bradley, SC Bar #66130  
MOORE BRADLEY MYERS LAW FIRM, PA  
PO Box 5709 (29171)  
1700 Sunset Blvd.  
West Columbia, South Carolina 29169  
803-796-9160

[Ward@mbmlawsc.com](mailto:Ward@mbmlawsc.com)

*Attorney for Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA*

West Columbia, South Carolina  
February 3, 2025

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Justice Jean Toal, Circuit Court Judge

Case No. 2024-001626

Rhonda Meisner, ..... Appellant,

vs.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;  
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.;  
Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA;  
Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC;  
Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and  
John Doe, (1-10), ..... Respondents.

---

**MEMORANDUM IN SUPPORT OF RESPONDENTS GRANT MEISNER, GRANT  
MEISNER, MD, LLC, SHEILA ROBINSON, MOORE TAYLOR & THOMAS, PA,  
MOORE TAYLOR LAW FIRM, PA, AND MOORE BRADLEY MYERS LAW FIRM,  
PA’S MOTION TO DISMISS APPELLANT’S APPEAL**

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Pursuant to Rules 201, 240, and 269 of the South Carolina Appellate Court Rules,  
Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor &  
Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA hereby  
submit this Memorandum in support of their Motion to Dismiss Appellant’s Appeal.

## **BACKGROUND**

On December 2, 2022, Chief Justice Jean H. Toal heard the Defendants' motions to dismiss in addition to motions filed by other parties in this case. By order dated December 15, 2022, Chief Justice Toal granted the motion to dismiss of the Defendants Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA. The December 15, 2022 Order also disposed of certain motions to dismiss filed by Appellant concerning counterclaims asserted against her.

On December 20, 2022, Retired Chief Justice Toal dismissed Moore Bradley Myers a/k/a Moore Taylor Thomas, PA a/k/a Moore Taylor Law Firm, PA.

On December 29, 2022, Appellant filed a Motion to Alter or Amend the trial court's December 15, 2022 Order. By order filed on January 10, 2023, Chief Justice Toal denied Appellant's Motion to Alter or Amend that order. Appellant filed her Notice of Appeal on February 15, 2023, attempting to appeal the January 10, 2023 Order. (See Meisner v. Meisner, et al., Appellate Case No. 2023-000232, Ct. App. Feb. 15, 2023.) On June 6, 2023, this Court dismissed that appeal as untimely. (June 6, 2023, Order.) On July 28, 2023, this Court granted in part the Defendants' motion for costs ordering Appellant to pay \$1,000.00 in attorney's fees. (July 28, 2023, Order.) Appellant has failed to remit such payment.

On December 1, 2023, Appellant filed a Motion to Alter or Amend seeking to have the trial court "clarify the dismissal of the Defendant's Counterclaims against the Plaintiff," and "to prevent further involvement of the dismissed Defendants in the proceedings." By order filed on August 19, 2024, Chief Justice Toal denied Appellant's Motion to Alter or Amend that order. Appellant filed Notice of Appeal from that order on September 23, 2024. (Sept. 23, 2024, Notice of Appeal.)

## **ARGUMENT**

### **Appellant's Appeal is Frivolous**

Appellant's claims against the Defendants were resolved on December 15, 2022, and December 20, 2022, when the trial court granted their motion to dismiss. Although Appellant attempted to appeal that order, she did not do so in a timely manner. Consequently, on June 6, 2023, this Court dismissed that appeal. The trial court's dismissal of Appellant's claims may not be relitigated in this appeal.

Nonetheless, Appellant now attempts to improperly expand the scope of this appeal to include the final and unappealable Order of December 15, 2022. To that end, in her Notice of Appeal, Appellant asserts that she is appealing "the Order of the Honorable Justice Jean Toal dated August 19, 2024 denying the Motion to Alter and Amend pursuant to Rule 60 filed December 1, 2023 that attempted to get a ruling on the SCRCP Rule 60b filed on January 11, 2023 and the previously filed Motion to Alter and Amend pursuant to Rule 52 and Rule 59 along with the underlying orders entered on December 15, 2022 and December 20, 2022." (Emphasis added.)

Appellant cannot revive her long resolved claims. Her appeal is clearly frivolous, it must be dismissed, and the Defendants are entitled to recover their attorney's fees and costs as a result.

## **CONCLUSION**

Based upon the foregoing authorities and arguments, Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA respectfully submit that they are entitled to an order dismissing Appellant's appeal as a matter of law.

Respectfully submitted,

s/James Edward Bradley

James Edward Bradley, SC Bar #66130

MOORE BRADLEY MYERS LAW FIRM, PA

PO Box 5709 (29171)

1700 Sunset Blvd.

West Columbia, South Carolina 29169

803-796-9160

[Ward@mbmlawsc.com](mailto:Ward@mbmlawsc.com)

*Attorney for Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA*

West Columbia, South Carolina

February 3, 2025

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Justice Jean Toal, Circuit Court Judge

Case No. 2024-001626

Rhonda Meisner, ..... Appellant,

vs.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;  
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.;  
Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA;  
Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC;  
Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and  
John Doe, (1-10), ..... Respondents.

---

**AFFIDAVIT OF JAMES EDWARD BRADLEY IN SUPPORT OF RESPONDENTS  
GRANT MEISNER, GRANT MEISNER, MD, LLC, SHEILA ROBINSON, MOORE  
TAYLOR & THOMAS, PA, MOORE TAYLOR LAW FIRM, PA, AND MOORE  
BRADLEY MYERS LAW FIRM, PA’S MOTION TO DISMISS APPELLANT’S  
APPEAL**

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PERSONALLY APPEARED BEFORE ME, James Edward Bradley, who, being  
duly sworn, states as follows:

1. I represent Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore, Taylor, & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, PA in the above-referenced matter.

2. Respondents Grant Meisner and Grant Meisner, MD, LLC filed a Motion to Dismiss Plaintiff's Amended Complaint on April 6, 2022, a copy of which is attached as **Exhibit A.**

3. Respondents Sheila Robinson, Moore, Taylor, & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, PA filed a Motion to Dismiss Plaintiff's Amended Complaint on April 12, 2022, a copy of which is attached as **Exhibit B.**

4. Respondents' motions were heard by retired Chief Justice Jean H. Toal on December 2, 2022.

5. The motion to dismiss was granted by order filed on December 15, 2022, a copy of which is attached as **Exhibit C.**

6. The motion to dismiss as to Moore, Taylor, & Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, PA and Sheila Robinson was granted December 20, 2022, a copy of which is attached as **Exhibit D.**

7. On December 29, 2022, Appellant filed a motion to alter and amend the trial court's Order, a copy of which is attached as **Exhibit E.**

8. Chief Justice Toal denied Appellant's motion to alter and amend by order filed on January 10, 2023, a copy of which is attached as **Exhibit F.**

9. Appellant filed Notice of Appeal on February 15, 2023, concerning the January 10, 2023 order. See Appellant Case No. 2023-000232

10. On June 6, 2023, this Court dismissed Appellants appeal as untimely.

11. On December 1, 2023, Appellant filed a second motion to alter and amend seeking "to prevent further involvement of the dismissed Defendants in the proceedings." A copy of the December 1, 2023 Motion of Appellant is attached as **Exhibit G.**

12. On August 19, 2024, Chief Justice Jean H. Toal issued an order denying Appellant's Motion to Alter or Amend filed on December 1, 2023. A copy of the August 18, 2024 order is attached as **Exhibit H.**

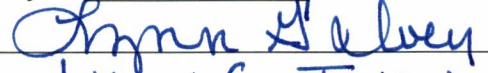
13. The Court awarded attorneys fees of \$1,000.00 in connection with Appellant's untimely appeal of Case No. 2023-000232. Appellant did not pay the ordered fees.

FURTHER AFFIANT SAYETH NAUGHT.

  
James Edward Bradley

SWORN to before me this 3<sup>rd</sup>

day of February 2025.

  
LYNN G. IVEY (P.S.)

Notary Public for South Carolina

My Commission expires: 1/10/33

# Exhibit A

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Rhonda Meisner, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Grant Meisner; Grant Meisner, MD, LLC; )  
 Sheila Robinson; Erwin Mangubat, MD; )  
 Moore, Taylor, & Thomas, P.A.; Moore )  
 Taylor Law Firm, P.A.; Moore Bradley )  
 Myers Law Firm, PA; Tricia L. Flowers; )  
 Flowers Consulting, LLC; Flowers )  
 Consulting, LLC; Richard G. Whiting, )  
 Esquire; Law Offices of Richard G. )  
 Whiting, PA, John Doe, (1-10) a fictional )  
 name assigned to identify parties that are )  
 not yet known or not yet determined, )  
 )  
 Defendants. )  
 )

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IN THE COURT OF COMMON PLEAS

C/A No. 2022-CP-40-01415

**MOTION TO DISMISS**

The Defendants Grant Meisner, MD and Grant Meisner, MD, LLC hereby move to dismiss this complaint with prejudice pursuant to South Carolina Rules of Civil Procedure 12(b)(6) on the following grounds:

1. This lawsuit is an extension of a Family Court lawsuit between the parties. South Carolina law vests exclusive jurisdiction of this dispute in the Family Court proceedings. As a result, this Court does not have jurisdiction of this matter, and the Defendants ask that it be dismissed with prejudice.
2. Any statements made by the Defendants were made within the context of the parties' ongoing marital relations and divorce proceedings. As a result they are privileged and the lawsuit should be dismissed with prejudice.
3. The complaint fails to properly allege the elements required to maintain a cause of action for defamation and civil conspiracy. As a result, this lawsuit should be dismissed with prejudice.

Respectfully submitted,

By: s/James Edward Bradley  
James Edward Bradley, SC Bar #66130  
MOORE BRADLEY MYERS LAW FIRM, P. A  
Post Office Box 5709  
West Columbia, South Carolina 29171  
Telephone: (803) 796-9160  
[Ward@mbmlawsc.com](mailto:Ward@mbmlawsc.com)  
***Attorney for the Defendants Grant Meisner, MD  
and Grant Meisner, MD, LLC***

West Columbia, South Carolina

April 6, 2022

# Exhibit B

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )  
 )  
 Rhonda Meisner, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 Grant Meisner; Grant Meisner, MD, LLC; )  
 Sheila Robinson; Erwin Mangubat, MD; )  
 Moore, Taylor, & Thomas, P.A.; Moore )  
 Taylor Law Firm, P.A.; Moore Bradley )  
 Myers Law Firm, PA; Tricia L. Flowers; )  
 Flowers Consulting, LLC; Flowers )  
 Consulting, LLC; Richard G. Whiting, )  
 Esquire; Law Offices of Richard G. )  
 Whiting, PA, John Doe, (1-10) a fictional )  
 name assigned to identify parties that are )  
 not yet known or not yet determined, )  
 )  
 Defendants. )  
 )

IN THE COURT OF COMMON PLEAS

C/A No. 2022-CP-40-01415

**MOTION TO DISMISS OF  
SHELIA ROBINSON, MOORE,  
TAYLOR, & THOMAS, P.A.,  
MOORE TAYLOR LAW FIRM,  
P.A., AND MOORE BRADLEY  
MYERS LAW FIRM, P.A.**

The Defendants Shelia Robinson, Moore, Taylor, Thomas, P.A., Moore Taylor Law Firm, P.A., and Moore Bradley Myers Law Firm, P.A. hereby move to dismiss this complaint with prejudice pursuant to South Carolina Rules of Civil Procedure 12(b)(6) on the following grounds:

1. Any statements made by the Defendants were made within the context of the parties' ongoing divorce proceedings. As a result they are privileged and the lawsuit should be dismissed with prejudice.
2. The complaint fails to properly allege the elements required to maintain a cause of action for civil conspiracy, defamation, trespass, trespass after notice, invasion of privacy, false light, abuse of process, and disclosure of private information. As a result, this lawsuit should be dismissed with prejudice.

Respectfully submitted,

[Signature block to follow]

By: s/James Edward Bradley  
James Edward Bradley, SC Bar #66130  
1700 Sunset Boulevard (29169)  
Post Office Box 5709  
West Columbia, South Carolina 29171  
Telephone: (803) 796-9160  
[Ward@mbmlawsc.com](mailto:Ward@mbmlawsc.com)

***Attorney for Defendants Grant Meisner, MD,  
Grant Meisner, MD, LLC, Shelia Robinson,  
Moore, Taylor, Tomas, P.A., Moore Taylor Law  
Firm, P.A., and Moore Bradley Myers Law Firm,  
P.A.***

West Columbia, South Carolina

April 12, 2022

# Exhibit C

STATE OF SOUTH CAROLINA  
COUNTY OF Richland  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE  
CASE NO. 2022CP4001415

Rhonda Meisner  
PLAINTIFF(S)

Grant Meisner et al  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

Various motions were heard on December 2, 2022; The Motion to Dismiss on behalf of Erwin Mangubat (filed 6/13/22) is GRANTED. The Motion to Dismiss on behalf of Law Office of Richard Whiting (filed 5/31/22) is GRANTED. The Motion to Dismiss on behalf of Richard Whiting (filed 5/2/22) is GRANTED. The Motion to Dismiss on behalf of Sheila Robinson (filed 4/12/22) is GRANTED. The Motion to Dismiss on behalf of Grant Meisner MD and Grant Meisner MD, LLC is GRANTED. The Motion to Quash (filed 6/15/22) is WITHDRAWN. The Motion for Protection (filed 6/20/22), Motion to Dismiss Counterclaims (filed 5/2/22) and Motion to Dismiss Counterclaims (filed 5/2/22) are all MOOT. The remaining Motion to Dismiss (filed 7/7/22) Motion for Appointment of Mediator (filed 10/11/22) Motion for Affirmative Relief (filed 7/2/22) and Motion to Dismiss (filed 6/24/22) are all DENIED as the parties have been DISMISSED.

**ORDER INFORMATION**

This order  ends  does not end the case.  See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/14/2022 .

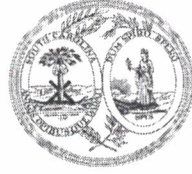
Rhonda Meisner for Rhonda Meisner  
John Doe (1-10)  
Flowers Consulting, LLC.  
Tricia L. Flowers  
Rhonda Meisner for Rhonda Meisner

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

---



Richland Common Pleas

**Case Caption:** Rhonda Meisner vs Grant Meisner , defendant, et al  
**Case Number:** 2022CP4001415  
**Type:** Order/Electronic Form 4

So Ordered

Jean H. Toal

Electronically signed on 2022-12-14 12:23:44 page 3 of 3

ELECTRONICALLY FILED - 2022 Dec 15 9:09 AM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415

# Exhibit D

FORM 4

STATE OF SOUTH CAROLINA  
COUNTY OF Richland  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP4001415

Rhonda Meisner  
PLAINTIFF(S)

Moore, Taylor & Thomas, P.A. et al  
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

a Rule 59 motion was filed on 12/16/22 in regards to the motions that were heard on December 2, 2022. The law firm of Moore Bradley Myers was dismissed from the case at the hearing but were inadvertently left off of the original order. Moore Bradley Myers Law Firm, PA a/k/a Moore, Taylor & Thomas PA a/k/a Moore Taylor Law Firm PA is hereby DISMISSED from the case.

ORDER INFORMATION

This order  ends  does not end the case.  See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/19/2022 .

Tricia L. Flowers  
James E. Parham, Jr.  
Stephanie Holmes Burton for Law Offices of Richard G. Whiting, PA  
James Edward Bradley for Moore, Taylor & Thomas, P.A., Moore Taylor Law Firm, P.A., Moore Bradley Myers Law Firm, PA  
Rhonda Meisner for Rhonda Meisner  
John Doe (1-10)  
Rhonda Meisner for Rhonda Meisner  
Flowers Consulting, LLC.

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.

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Richland Common Pleas

**Case Caption:** Rhonda Meisner vs Grant Meisner , defendant, et al  
**Case Number:** 2022CP4001415  
**Type:** Order/Electronic Form 4

So Ordered

Jean H. Toal

Electronically signed on 2022-12-19 17:02:55 page 3 of 3

# Exhibit E

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )

IN THE COURT OF COMMON PLEAS  
 5TH JUDICIAL CIRCUIT

CASE NO.: 2022-CP-40--1415

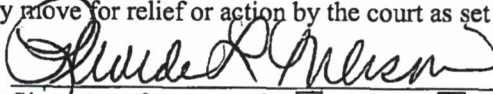
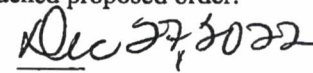
Rhonda Meisner )  
 )  
 Plaintiff, )  
 vs. )

**MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET**

Grant Meisner; Grant Meisner, MD, LLC;  
 Sheila Robinson; Erwin Mangubat, MD;  
 Moore, Taylor, & Thomas, P.A.; Moore  
 Taylor Law Firm, P.A.; Moore Bradley Myers  
 Law Firm, PA.; Tricia L. Flowers; Flowers  
 Consulting, LLC; Flowers Consulting, LLC;  
 Richard G. Whiting, Esquire; Law Offices of  
 Richard G. Whiting, PA. John Doe, (1-10) a  
 fictional name assigned to identify parties that  
 are not yet known or not yet determined.

Defendant. )

RICHLAND COUNTY  
 FILED  
 2022 DEC 29 AM 11:45  
 JEREMY W. MARRIOTT  
 C.C.P., G.S., & F.C.

Plaintiff's Attorney: Rhonda Meisner, Bar No. n/a Address: PO Box 689 Blythewood, SC 29016 Phone: 803-206-3402 Fax _____ E-mail: scorequipment@gmail.com Other: _____	Defendant's Attorney: James Edward Bradley, Bar No. _____ Address: PO Box 1576 Irmo, South Carolina 29063 Phone: 803-749-8555 Fax _____ E-mail: WARD@MBMLAWSC.COM Other: _____
<input checked="" type="checkbox"/> <b>MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)</b> <input type="checkbox"/> <b>FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)</b> <input type="checkbox"/> <b>PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)</b>	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: MOTION to ALTER AND AMEND Estimated Time Needed: 1 HOUR      Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b>	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant	 Date submitted
<b>SECTION III: Motion Fee</b>	
<input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason)	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	

<b>JUDGE'S SECTION</b>	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order.	JUDGE CODE _____
<input type="checkbox"/> Other: _____	Date: _____
<b>CLERK'S VERIFICATION</b>	
Collected by: _____	Date Filed: _____
<input type="checkbox"/> MOTION FEE COLLECTED: \$ _____	
<input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____	

SCCA 233 (11/2003)

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.

IN THE CIRCUIT COURT FIFTH JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

**MOTION TO ALTER AND AMEND PURSUANT TO S.C.R.C.P. RULE 52 AND RULE 59 (e)**

JEANETTE W. MORRIS  
C.C.P., G.S., & F.C.P.

2022 DEC 29 AM 11:45

RICHLAND COUNTY  
FILED

**TO THE DEFENDANTS** Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.

**THIS MOTION TO ALTER AND AMEND IS FILED WITHIN 10 DAYS OF RECEIPT OF EMAIL CONSIDERING THE CHRISTMAS HOLIDAY AND NOTWITHSTANDING THE SOUTH CAROLINA COURT OF APPEALS DETERMINED EMAIL IS NOT PROPER SERVICE ON A SELF-REPRESENTED DEFENDANT.**

**INTRODUCTION**

During the hearing on the motion to dismiss, the Defendants attempted to argue this lawsuit was simply a continuation of the marital dissolution of the plaintiff and Defendant Grant Meisner.

The pleadings in this case and the four corners of the complaint make clear that this case is the result of conduct outside the confines of the Court Room that occurred in an unprivileged setting and unprivileged manner.

In fact, as previously argued to the Court, bringing the causes of action in the Family Court would not only be improper, but it would deny the plaintiff her requested jury trial.

The obvious purpose was to attempt to prejudice the Court against the plaintiff; however, in attempting to tether this case to the marital dissolution, the Defendants made multiple false and/or misleading statements to the Court to further their interests and request dismissal.

For example, the defendants informed the Court that the plaintiff and Grant Meisner was in week 3 of a divorce trial that was filed in 2019 in an effort to claim the plaintiff was the cause of the extended period of litigation; however, they failed to inform the Court that the Honorable Judge Leslie Riddle suggested a 17 day trial in her mediation report or that on day four of the actual trial it was Defendant Grant Meisner and Defendant Sheila Robinson of the Moore Bradley Myers Law Firm that informed the trial judge the Honorable Joseph Smithdeal that they did not want to continue with Judge Smithdeal after he recused himself. Judge Smithdeal recused himself because another attorney in the Moore Bradley Myers Law Firm sued him in a civil nuisance suit. Judge Smithdeal stated he was willing to continue and could judge fairly and was not affected by the nuisance lawsuit that was filed by a different member of Moore Bradley Myers Law Firm, but that the ethical cannon required him to recuse himself. Sheila Robinson on behalf of Grant Meisner informed the Court that they wanted another judge, not the Plaintiff.

The attorneys for the Defendant's Grant Meisner and Grant Meisner, MD, LLC also did not inform the Court that Defendant Sheila Robinson attempted to enter into evidence the filing

of this complaint into the record of the marital dissolution which quite obviously was not allowed, as it is unrelated to the marital dissolution claims and defenses.

Defendant Erwin Mangubat also attempted to change his motion to dismiss to that of a summary judgment motion improperly by submitting to the Court other papers outside of the complaint associated with the evaluation that Erwin Mangubat, MD completed on Defendant Grant Meisner and the discovery ruling in a different case of the Honorable Rosalyn Frierson-Smith.

Finally, attorneys for Defendant's Grant Meisner and Grant Meisner, MD, LLC brought up other cases unrelated to this case for the purposes of prejudicing the Court regarding the Plaintiff without including the final rulings by this Court or the Honorable Cameron Currie.

#### **BACKGROUND AND BASIS FOR THE MOTION**

As an initial matter, none of the Defendants filed or served a hearing notice on the Plaintiff for their motion to dismiss 10 days in advance of the hearing as required by SCRCF Rule 6(d).

A review of the Clerk of Court's records indicates the defendants also did not file any hearing notices with the Clerk of Court nor did they request relief during the hearing for failing to comply with SCRCF Rule 6(d). The language in Rule 6(d) requires the hearing notice to be served and filed at least 10 days in advance of the hearing. A review of the Court's filings indicate only the Plaintiff complied with the mandatory notice requirements for her motions.

Additionally, as argued during the hearing, at least two defendants Tricia L. Flowers and Flowers Consulting, LLC did not answer the complaint, or the amended complaint and an affidavit of default was filed with the Court as to these defendants and served on the parties. The

plaintiff argued the acts of the agent are imputed to the principal, which implicates all defendants that have been properly served.

The Rules require parties to participate in discovery and mediation; however, here multiple defendants failed to answer the requests for admission or answer discovery despite the fact the plaintiff requested relief from the Court which was denied in the Form 4.

Finally, the Court denied the Plaintiff's request to dismiss the counterclaims of the Defendants which included the request for attorney's fees by the Defendants which the plaintiff avers were not advanced in the hearing and any such arguments were abandoned by not following the rules as it relates to all defendants. As attorney's fees relates to Grant Meisner, Grant Meisner, MD, LLC, Richard Whiting, and the Law Offices of Richard Whiting SC, PA these defendants abandoned their motions by failing to file a hearing notice, serve the notice on the plaintiff or appear at the Motion hearing.

As attorney's fees relate to Erwin Mangubat, MD he did not file a hearing notice, serve a hearing notice on the plaintiff, or appear at the hearing. To the extent his counsel appeared and argued that he withdrew the counterclaims, his arguments to the Court did not include a request to waive Erwin Mangubat, MD's appearance in support of a substantive motion and attempted to change the Motion to Dismiss to a Motion for Summary Judgement by offering into evidence and handing to the plaintiff copies of the assessment he performed. As to Defendants Sheila Robinson, Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA those entities are not entitled to attorney's fees because they are self-represented entities for which attorneys fees are not available under the American Rule.

#### **ARGUMENT**

Defendants Grant Meisner, Grant Meisner MD, LLC, Richard G. Whiting, the Law offices of Richard G Whiting, PA, Erwin Mangubat, MD, Moore, Taylor, & Thomas, P.A. Moore Taylor Law Firm, P.A. Moore Bradley Myers Law Firm, PA. failed to file a notice of hearing or serve a hearing notice on the defendant. A review of the filings indicates only the Plaintiff's notice of hearing was filed with the Court and served on the Defendants. **EXHIBIT A Plaintiff's hearing notice and proof of service.**

As such, the plaintiff avers the Defendants abandoned their motion to dismiss by not properly noticing the hearing and as such the Defendants motions were not properly before the court because they failed to file a hearing notice, serve the notice, or request relief or excuse from the Court for not filing or serving the hearing notice.

**I. Dismissal is not warranted as the Complaint and Amended Complaint adequately state a claim for relief on all causes of action.**

**A. Defendants failed to Notice the Motion to Dismiss Hearing as required by the Rules or Request relief for not appearing at substantive hearing.**

1. None of the Defendants filed a hearing notice 10 days in advance or served such on the Plaintiff, as evidenced by the Court records.
2. Defendants Erwin Mangubat, MD, Grant Meisner, Grant Meisner, MD, LLC, Richard G. Whiting, or the Law Offices of Richard G. Whiting, PA, Tricia L. Flowers\*, Flowers Consulting, LLC\* failed to appear at the Motion hearing and their counsel of record failed to request relief, submit an affidavit, or request to be excused from a substantive hearing as evidence by the Court records.

**B. Some Defendants have defaulted and not answered the Complaint**

As argued in the hearing, Defendants Tricia L. Flowers and Flowers Consulting, LLC failed to answer the Complaint and the acts of the agent are imputed to the principal which implicates all the Defendants as outlined in the civil conspiracy claim, trespass, trespass after

notice, invasion of privacy, false light claim, abuse of process and public disclosure of private information. To the extent which principals are involved in the failures and the bad acts of Tricia Flowers and Flowers Consulting, LLC those claims should not be dismissed, and the Plaintiff respectfully requests the Court to reconsider its Order of Dismissal filed by Form 4 on December 15, 2022. **EXHIBIT B Affidavit of Default for Tricia L. Flowers filed with the Court.**

The plaintiff's request for participation in discovery and mediation should have been granted because the acts of the agent are imputed to the principal. To the extent, Tricia L. Flowers actions are attributable to all defendants, the plaintiff avers she is entitled to discovery.

The defendants have also requested relief that borders on a permanent injunction for future events which the plaintiff avers is unconstitutional and should not be allowed.

**C. Defendants are not entitled**

*Exhibit C Declaration of  
Chonda Meisner*

**II. Defendants are not entitled to relief in the form of the Counterclaims for attorney's fees.**

- A. Defendant Erwin Mangubat failed to put any facts into evidence that provided for recovery of attorney's fees.
- B. Defendants Grant Meisner and Grant Meisner, MD, LLC failed to file a notice of hearing, failed to appear without excuse at the substantive hearing, and failed to put forth a valid claim for attorney's fees.
- C. Defendants Richard G. Whiting and the Law Offices of Richard G. Whiting, PA failed to file notice of the hearing, failed to serve notice of the hearing, and failed to appear without excuse to the motion hearing.
- D. Defendants Sheila Robinson, Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA. failed to file a hearing notice, serve the hearing notice for the motion to dismiss and to advance their counterclaims for attorney's

fees. Additionally, these Defendants are not entitled to attorney's fees as self-represented litigants because both the representative attorney and individual attorney are partners in the firm Moore Bradley Myers Law Firm.

In conclusion, While the Court is not required to make findings of fact or conclusions of law for motions hearings, the Plaintiff respectfully requests a ruling on the following that was advanced in either the hearing or papers filed in response to the Defendant's motions or in support of her own motions.

1. A ruling and determination that the Court has subject matter jurisdiction over the claims in this case.
2. A ruling and determination that the Court has personal jurisdiction over the individual defendants, the corporate defendants, and the artificial entity defendants.
3. A ruling and determination on whether the Defendants motion to dismiss was proper because they failed to serve the same papers on the plaintiff that were filed with the court as advanced in the Plaintiff's return to the motion to dismiss.
4. A ruling on whether the complaint adequately alleges the elements for civil conspiracy as to each and every defendant.
5. A ruling and determination on whether the complaint adequately alleges the elements for defamation as it relates to Defendants Grant Meisner, Sheila Robinson, and Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA. defendants.
6. A ruling and determination of whether the comments and actions of defendants Grant Meisner, Grant Meisner, MD, LLC, and Sheila Robinson are privileged as alleged in the Defendants motion to dismiss.

7. A ruling and determination that the family court does not have exclusive jurisdiction over the claims in this case as alleged by Defendants Grant Meisner and Grant Meisner, MD, LLC.
8. A ruling and determination that any injunction against future events by defendants Grant Meisner and Grant Meisner, MD, LLC is unconstitutional.
9. A ruling and determination that this complaint is not frivolous as alleged by the Defendants Grant Meisner and Grant Meisner, MD, LLC in the counterclaims.
10. A ruling and determination that attorneys' fees are not available to Grant Meisner and Grant Meisner, MD, LLC
11. A ruling and determination that the complaint adequately alleges the elements required to maintain a cause of action for civil conspiracy, defamation, trespass, trespass after notice, invasion of privacy, false light, abuse of process, and disclosure of private information as to Defendant Sheila Robinson, Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA. defendants.
12. A ruling and determination that Any statements made by Defendant Sheila Robinson were made within the context of the parties' ongoing divorce proceedings. As a result, they are privileged, and the lawsuit should be dismissed with prejudice.
13. A ruling and determination that the allegations against Richard Whiting are outside of his Order of Appointment.
14. A ruling and determination that the allegations against Richard Whiting exceed his qualified privilege as an appointed guardian ad litem.

15. A ruling and determination that the allegations against Richard G. Whiting are outside of his Order of Appointment.
  16. A ruling and determination that the allegations against the Law Offices Richard Whiting, PA are outside of individual Order of Appointment of Richard G. Whiting.
  17. A ruling and determination that Defendants Grant Meisner and Grant Meisner, MD, LLC request for an injunction fails to identify the kind of injunction whether temporary or permanent and should be dismissed.
  18. A ruling and determination that Defendants Grant Meisner and Grant Meisner, MD, LLC request for an injunction fails to identify any kind of irreparable harm and should be dismissed.
  19. A ruling and determination that Defendants Grant Meisner and Grant Meisner, MD, LLC request for attorney's fees pursuant to the frivolous claims act is improper because he used the plaintiff's personal information without permission.
  20. A ruling and determination that the plaintiff did not need to allege special damages in pleading for civil conspiracy.
  21. A ruling and determination that defendants are required to participate in mediation and discovery as required by the rules.
  22. A ruling and determination that any dismissal of any Defendants is without prejudice.
- For the above reasons as advanced in the filed responses to the Defendant's Motion to Dismiss, the filings in this case, and the arguments advanced in the Motion to Dismiss hearing and this Motion for reconsideration, the Plaintiff respectfully requests a hearing on this Motion to Alter and Amend.

**SIGNATURE LINE NEXT PAGE**

December 16, 2012

Respectfully Submitted,

*Rhonda Meisner*

Rhonda Meisner

PO Box 689

Blythewood, SC 29016

[scorequipment@gmail.com](mailto:scorequipment@gmail.com)

(803)206-3402

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC;  
Sheila Robinson; Erwin Mangubat, MD;  
Moore, Taylor, & Thomas, P.A.; Moore  
Taylor Law Firm, P.A.; Moore Bradley  
Myers Law Firm, P.A.; Tricia L. Flowers;  
Flowers Consulting, LLC; Flowers  
Consulting, LLC; Richard G. Whiting,  
Esquire; Law Offices of Richard G. Whiting,  
PA. John Doe, (1-10) a fictional name  
assigned to identify parties that are not yet  
known or not yet determined.

IN THE CIRCUIT COURT FIFTH  
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

<sup>B</sup>  
~~A~~  
EXHIBIT ATTACHED TO  
MOTION TO ALTER AND AMEND  
PURSUANT TO S.C.R.C.P. RULE 52  
AND RULE 59

**EXHIBIT B**  
**PLAINTIFF'S FILED AFFIDAVIT OF DEFAULT**  
**OF TRICIA L. FLOWERS**  
**AFFIDAVIT OF SERVICE FOR TRICIA L.**  
**FLOWERS**

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC;  
Sheila Robinson; Erwin Mangubat, MD;  
Moore, Taylor, & Thomas, P.A.; Moore  
Taylor Law Firm, P.A.; Moore Bradley  
Myers Law Firm, P.A.; Tricia L. Flowers;  
Flowers Consulting, LLC; Flowers  
Consulting, LLC; Richard G. Whiting,  
Esquire; Law Offices of Richard G. Whiting,  
PA. John Doe, (1-10) a fictional name  
assigned to identify parties that are not yet  
known or not yet determined.

IN THE CIRCUIT COURT FIFTH  
JUDICIAL CIRCUIT

DOCKET NO. 2022-CP-40-01415

*Exhibit  
C*

**DECLARATION OF RHONDA  
MEISNER PURSUANT TO 28 U.S.C. §  
1746**

+

**My name is Rhonda Meisner, and I am the plaintiff in this action and over 18 and capable of making this declaration under penalty of perjury for the truth of the matters herein. I declare the following facts to be true except those fact that are submitted upon information and belief; however, I believe those facts to be true as well.**

1. I attended the motions hearings on December 2, 2022 before the Honorable Justice Jean Toal. I did not see Grant Meisner, Richard Whiting, or Erwin Mangubat, MD in attendance at the hearing, nor did I receive any papers excusing their absence prior to the hearing nor did I hear any request for the Defendants to be excused from the hearing.
2. I never received any hearing notices from any defendants for their motions to be heard on December 2, 2022 prior to the hearing, but I filed and served the hearing notice on all defendants 10 days in advance of the hearing on my motions.

The above statements are true and subject to penalty of perjury.

*December 27, 2022  
Scrubbed & signed this day*

*Rhonda Meisner Plaintiff  
Rhonda Meisner  
SC DL# ending in 1138*

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.

IN THE CIRCUIT COURT FIFTH  
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

AFFIDAVIT OF DEFAULT FOR  
TRICIA L. FLOWERS

JEANETTE W. MCBRIDE  
C.C.P., G.S., & F.C.  
2022 JUL 13 PM 4:20

RICHLAND COUNTY  
FILED

My name is Rhonda Meisner, and I am the plaintiff in this action I am over 18 years old and competent to make this affidavit under penalty of perjury, having been duly sworn deposes and says the facts are as follows:

1. I am the plaintiff in this action.
2. I sent a copy of the amended coversheet, amended summons, and amended complaint via certified mail to Tricia Flowers at 69 Cherry Grove Drive West Columbia, SC 29170 on May 16, 2022, as evidenced by the attached copy of the certified mail receipt. <sup>1</sup> Ms. Flowers did not sign for any of the documents sent to her.
3. I requested Grindstone Process Servers to serve Tricia Flowers and Flowers Consulting, LLC.

<sup>1</sup> EXHIBIT 1 Certified mail receipt.

4. Pursuant to the Proof of Services filed herein, the Defendant Tricia Flowers was served a copy of the coversheet, summons, complaint, the amended coversheet, amended summons, and amended complaint on June 4, 2022, by Grindstone Process Servers.<sup>2</sup>
5. Upon information and belief, the Defendant Tricia Flowers is the registered agent for Flowers Consulting, LLC, and the proper address for service for Flowers Consulting, LLC is 69 Cherry Grove Drive West Columbia, SC 29170.<sup>3</sup>
6. Upon information and belief, the Defendant, Tricia Flowers is not now, and was not at the time of the commencement of this action, in the military services of the United States Government as is contemplated under the Soldiers and Sailors Civil Relief Act.

FURTHER AFFIANT SAYETH NOT

*July 13, 2022*

*Rhonda Meisner*

Rhonda Meisner  
PO Box 689  
Blythewood, South Carolina 29016  
scorequipment@gmail.com  
(803)206-3402

*Clyde*

Notary for the State of South Carolina

My commission expires on 22<sup>nd</sup> day of November 20 23.



CLAYTON CARIMI  
NOTARY PUBLIC  
SOUTH CAROLINA  
MY COMMISSION EXPIRES  
11/22/2023

<sup>2</sup> EXHIBIT 2 Affidavit of Service of Process for Tricia Flowers by Stacy Rose of Grindstone process servers.  
<sup>3</sup> EXHIBIT 3 Secretary of State's recording of Registered Agent.

EXHIBIT #1

5345 2720 0002 0736 9456

U.S. Postal Service  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

West Virginia 05/16/2022

**OFFICIAL USE**

Certified Mail Fee \$3.75 0016 07

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$0.00  
 Return Receipt (electronic) \$0.00  
 Certified Mail Restricted Delivery \$0.00  
 Adult Signature Required \$0.00  
 Adult Signature Restricted Delivery \$0.00

Postage \$2.36

Total Postage and Fees \$6.11

Postmark Here 05/16/2022

Sent To James Edward Bradley Moore Brad  
 Street and Apt. No., or PO Box No.  
 PO Box 5709  
 City, State, ZIP+4® West Columbia, SC 29174

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

5345 2720 0002 0736 9456

U.S. Postal Service  
**CERTIFIED MAIL® RECEIPT**  
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For delivery information, visit our website at [www.usps.com](http://www.usps.com)

West Virginia 05/16/2022

**OFFICIAL USE**

Certified Mail Fee \$3.75 0016 0

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$0.00  
 Return Receipt (electronic) \$0.00  
 Certified Mail Restricted Delivery \$0.00  
 Adult Signature Required \$0.00  
 Adult Signature Restricted Delivery \$0.00

Postage \$8.70

Total Postage and Fees \$12.45

Postmark Here 05/16/2022

Sent To James Edward Bradley Moore Brad  
 Street and Apt. No., or PO Box No.  
 PO Box 5709  
 City, State, ZIP+4® West Columbia, SC 29174

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

5445 2720 0002 0736 9456

U.S. Postal Service  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

Colorado 05/16/2022

**OFFICIAL USE**

Certified Mail Fee \$3.05 0016 07

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$9.75  
 Return Receipt (electronic) \$0.00  
 Certified Mail Restricted Delivery \$0.00  
 Adult Signature Required \$0.00  
 Adult Signature Restricted Delivery \$0.00

Postage \$2.56

Total Postage and Fees \$15.36

Postmark Here 05/16/2022

Sent To Emma Maroubat, MD  
 Street and Apt. No., or PO Box No.  
 3 Richard Medical Park Suite 310  
 City, State, ZIP+4® Columbia, SC 29203

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

5445 2720 0002 0736 9456

U.S. Postal Service  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

South Carolina 05/16/2022

**OFFICIAL USE**

Certified Mail Fee \$3.05 0016 001

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$9.75  
 Return Receipt (electronic) \$0.00  
 Certified Mail Restricted Delivery \$0.00  
 Adult Signature Required \$0.00  
 Adult Signature Restricted Delivery \$0.00

Postage \$8.70

Total Postage and Fees \$21.50

Postmark Here 05/16/2022

Sent To Grant Meisner  
 Street and Apt. No., or PO Box No.  
 112 Chestnut Road  
 City, State, ZIP+4® Bluffton, SC 29916

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

6956 2720 0002 0736 9456

U.S. Postal Service  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

West Virginia 05/16/2022

**OFFICIAL USE**

Certified Mail Fee \$3.05 0016 07

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$9.75  
 Return Receipt (electronic) \$0.00  
 Certified Mail Restricted Delivery \$0.00  
 Adult Signature Required \$0.00  
 Adult Signature Restricted Delivery \$0.00

Postage \$8.70

Total Postage and Fees \$21.50

Postmark Here 05/16/2022

Sent To India Flowers  
 Street and Apt. No., or PO Box No.  
 601 Fernside Drive  
 City, State, ZIP+4® West Columbia, SC 29174

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

6956 2720 0002 0736 9456

U.S. Postal Service  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

West Virginia 05/16/2022

**OFFICIAL USE**

Certified Mail Fee \$3.05 0016 001

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$9.75  
 Return Receipt (electronic) \$0.00  
 Certified Mail Restricted Delivery \$0.00  
 Adult Signature Required \$0.00  
 Adult Signature Restricted Delivery \$0.00

Postage \$2.56

Total Postage and Fees \$15.36

Postmark Here 05/16/2022

Sent To Sheila Robinson to Moore Br  
 Street and Apt. No., or PO Box No.  
 PO Box 5709  
 City, State, ZIP+4® West Columbia, SC 29174

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

EXHIBIT #2

AFFIDAVIT OF SERVICE

Case: 2022CP4001415	Court: The State Of South Carolina County Of Richland Court Of Common Pleas	County: Richland, SC	Job: 7160867
Plaintiff / Petitioner: Rhonda Meisner		Defendant / Respondent: Grant Meisner; Grant Meisner, MD, LLC; Shella ) Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, P.A.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; John Doe, 0-10 a fictional name assigned to identify parties that are not yet known or not yet determined.	
Received by: Grindstone Process Servers		For: Rhonda L. Meisner	
To be served upon: Tricia Flowers			

I, Stacey Rose, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Tricia Flowers, 69 Cherry Grove Dr, West Columbia, SC 29170

Manner of Service: Substitute Service: Personal, Jun 4, 2022, 11:53 am EDT

Documents: cover, summons, complaint, amended cover, amended summons, and amended complaint (Received May 30, 2022 at 4:00pm EDT)

Additional Comments:

1) Successful Attempt: Jun 4, 2022, 11:53 am EDT at 69 Cherry Grove Dr, West Columbia, SC 29170 received by Tricia Flowers. Ethnicity: Caucasian; Gender: Male; Relationship: Husband; Other: Take Flowers accepted documents;

[Signature] 6/4/22  
Stacey Rose Date

Grindstone Process Servers  
37 Arborland Court  
Columbia, SC 29212  
8032128831

Subscribed and sworn to before me by the affiant who is personally known to me.

[Signature]  
Notary Public  
Date  


# Business Entities Online

File, Search, and Retrieve Documents Electronically

EXHIBIT #3

## FLOWERS CONSULTING, LLC

### Corporate Information

Entity Type: Limited Liability Company

Status: Good Standing

Domestic/Foreign: Domestic

Incorporated State: South Carolina

### Important Dates

Effective Date: 03/11/2010

Expiration Date: N/A

Term End Date: N/A

Dissolved Date: N/A

### Registered Agent

Agent: TRICIA L. FLOWERS

Address: 69 CHERRY GROVE DRIVE  
W. COLUMBIA, South Carolina 29170

### Official Documents On File

Filing Type	Filing Date
Organization	03/11/2010

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC;  
Sheila Robinson; Erwin Mangubat, MD;  
Moore, Taylor, & Thomas, P.A.; Moore  
Taylor Law Firm, P.A.; Moore Bradley  
Myers Law Firm, P.A.; Tricia L. Flowers;  
Flowers Consulting, LLC; Flowers  
Consulting, LLC; Richard G. Whiting,  
Esquire; Law Offices of Richard G. Whiting,  
PA. John Doe, (1-10) a fictional name  
assigned to identify parties that are not yet  
known or not yet determined.

IN THE CIRCUIT COURT FIFTH  
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

**EXHIBIT A ATTACHED TO  
MOTION TO ALTER AND AMEND  
PURSUANT TO S.C.R.C.P. RULE 52  
AND RULE 59**

**EXHIBIT A  
PLAINTIFF'S FILED HEARING NOTICE**

Rhonda Meisner  
PO Box 689  
Blythewood, SC 29016  
(803) 906-8409

The Honorable Jeanette McBride  
Richland County Clerk of Court  
Richland County Judicial Center  
Post office Box 192  
Columbia, SC 29202

2022 NOV 21 AM 9:09  
JEANETTE W. MCBRIDE  
C.C.P., G.S., & F.C.

RICHLAND COUNTY  
FILED

cc. VIA email with motion attached to [ward@mbmssc.com](mailto:ward@mbmssc.com) and via US Postal Service prepaid to James Edward Bradley PO Box 5709 West Columbia SC 29171  
VIA email with motion attached to [sburton@gibbesburton.com](mailto:sburton@gibbesburton.com) via US Postal Service prepaid to Stephanie Burton 308 E. St. John Street Spartanburg, SC 29302  
VIA email with motion attached to [jparham@jparhamlaw.com](mailto:jparham@jparhamlaw.com) via US Postal Service prepaid to James Parham PO Box 1576 Irmo, SC 29063.

Dear Ms. McBride,

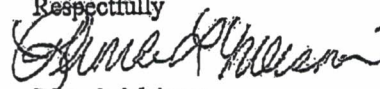
Enclosed please stamp and file 1. This letter 2. The Original Notice of Hearing 3. This Certificate of Service. If you would also kindly stamp the copy of the above and place it in the pre-stamped envelope I would appreciate your help.

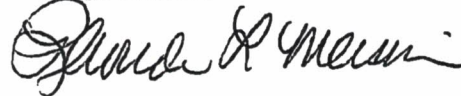
Thank you in advance for your help.

November 19, 2022

November 21, 2022

Respectfully

  
Rhonda Meisner



STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, P.A. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.

IN THE CIRCUIT COURT FIFTH JUDICIAL CIRCUIT

DOCKET NO. 2022-CP-40-01415

NOTICE OF MOTION HEARING FOR

1. MOTION TO DISMISS COUNTER-CLAIMS OF DEFENDANTS GRANT MEISNER AND GRANT MEISNER, MD, LLC
2. MOTION TO DISMISS THE COUNTERCLAIMS OF DEFENDANTS SHEILA ROBINSON; MOORE TAYLOR & THOMAS; MOORE TAYLOR LAW FIRM; AND MOORE BRADLEY MYERS LAW FIRM
3. MOTION TO DISMISS COUNTERCLAIMS OF ERWIN MANGUBAT AND FOR SANCTIONS
4. MOTION FOR AFFIRMATIVE RELIEF AS TO DEFENDANT ERWIN MANGUBAT
5. MOTION TO APPOINT A MEDIATOR AND PARTICIPATE IN DISCOVERY AS TO ALL DEFENDANTS

JEANETTE W. MCBRIDE  
C.C.P., G.S., & E.C.

2022 NOV 21 AM 9:10

RICHLAND COUNTY  
FILED

DECEMBER 2, 2022,

2:00 P.M.

BEFORE THE HONORABLE CHIEF JUSTICE TOAL  
COURTROOM 3A  
RICHLAND COUNTY JUDICIAL CENTER 1701 MAIN STREET  
COLUMBIA SOUTH CAROLINA



STATE OF SOUTH CAROLINA  
COUNTY OF Richland  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP4001415

Rhonda Meisner  
PLAINTIFF(S)

Grant Meisner et al  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

Various motions were heard on December 2, 2022; The Motion to Dismiss on behalf of Erwin Mangubat (filed 6/13/22) is GRANTED. The Motion to Dismiss on behalf of Law Office of Richard Whiting (filed 5/31/22) is GRANTED. The Motion to Dismiss on behalf of Richard Whiting (filed 5/2/22) is GRANTED. The Motion to Dismiss on behalf of Sheila Robinson (filed 4/12/22) is GRANTED. The Motion to Dismiss on behalf of Grant Meisner MD and Grant Meisner MD, LLC is GRANTED. The Motion to Quash (filed 6/15/22) is WITHDRAWN. The Motion for Protection (filed 6/20/22), Motion to Dismiss Counterclaims (filed 5/2/22) and Motion to Dismiss Counterclaims (filed 5/2/22) are all MOOT. The remaining Motion to Dismiss (filed 7/7/22) Motion for Appointment of Mediator (filed 10/11/22) Motion for Affirmative Relief (filed 7/2/22) and Motion to Dismiss (filed 6/24/22) are all DENIED as the parties have been DISMISSED.

**ORDER INFORMATION**

This order  ends  does not end the case.  See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/14/2022 .

Rhonda Meisner for Rhonda Meisner  
John Doe (1-10)  
Flowers Consulting, LLC.  
Tricia L. Flowers  
Rhonda Meisner for Rhonda Meisner

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

---



Richland Common Pleas

**Case Caption:** Rhonda Meisner vs Grant Meisner , defendant, et al  
**Case Number:** 2022CP4001415  
**Type:** Order/Electronic Form 4

So Ordered

Jean H. Toal

Electronically signed on 2022-12-14 12:23:44 page 3 of 3

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.

IN THE CIRCUIT COURT FIFTH JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

**CERTIFICATE OF SERVICE MOTION TO ALTER AND AMEND**

+

2022 DEC 29 AM 11:45  
JEANETTE W. MORRIS  
C.C.P. S.S., & F.C.

RICHLAND COUNTY  
FILED

The Plaintiff certifies she has served a copy of her letter to the Clerk of Court, MOTION TO ALTER AND AMEND, a copy of the Order affected by this motion and with this certificate of service in the United States Mail postage prepaid to the following defendants:

1. **Stephanie Burton** at 308 E. Saint John Street Spartanburg, SC 29302 for Richard Whiting and the Law Offices of Richard Whiting.
2. To James Edward Bradley of MOORE BRADLEY MYERS LAW FIRM, P. A Post Office Box 5709 West Columbia, South Carolina 29171 for Defendants **Sheila Robinson, Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA., Grant Meisner, and Grant Meisner, MD, LLC**
3. James E. Parham, Jr, P.A. for Erwin Mangubat, MD at Post Office Box 1576 Irmo, SC 29063. Additionally, all defendants, will be notified via the electronic filing system of the court.
4. Additionally, the plaintiff requested an additional stamped copy be placed in the mailbox of the Honorable Justice Jean Toal.

Respectfully Submitted,



December 27, 2022

Rhonda Meisner  
PO Box 689  
Blythewood, SC 29016  
scorequipment@gmail.com  
(803)206-3402

Richland County Common Pleas

Clerk : Jeanette W. McBride  
Richland County Judicial Center  
Columbia, SC 29201  
(803) 576-1999

Received From: Meisner, Rhonda  
P.O Box 689  
Blythewood, SC 29016  
Paying for: Self  
Transaction Type: Payment  
Payment Type: Money Order \$25.00  
Total Paid: \$25.00

Date: 12/29/2022  
Receipt #: 316061  
Clerk: c40rmoorma

Reference #:9324  
Comment:

Non-Refundable

Case #	Caption	Previous Balance	Amount Paid	Balance Due
2022CP4001415	Rhonda Meisner vs Grant Meisner , defendant, et al	\$25.00	\$25.00	\$0.00
<b>Total Cases:</b>	<b>1</b>	<b>\$25.00</b>	<b>\$25.00</b>	<b>\$0.00</b>

# Exhibit F

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS  
FOR THE FIFTH JUDICIAL CIRCUIT

RHONDA MEISNER,

C.A. No. 2022-CP-40-01415

Plaintiff,

v.

**ORDER DENYING PLAINTIFF'S  
MOTION TO ALTER AND AMEND**

GRANT MEISNER; GRANT MEISNER,  
MD, LLC; SHEILA ROBINSON; ERWIN  
MANGUBAT, MD; MOORE, TAYLOR, &  
THOMAS P.A.; MOORE TAYLOR LAW  
FIRM, P.A.; TRICIA L. FLOWERS;  
FLOWERS CONSULTING, LLC;  
RICHARD G. WHITING, ESQUIRE; LAW  
OFFICES OF RICHARD G. WHITING,  
P.A. JOHN DOE, (1-10) A FICTIONAL  
NAME ASSIGNED TO IDENTIFY  
PARTIES THAT ARE NOT YET KNOWN  
OR NOT YET DETERMINED.

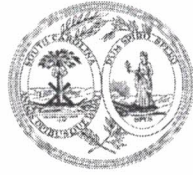
Defendants.

Plaintiff Rhonda Meisner has moved this Court for a ruling that alters and amends the Court's December 15, 2022 and December 20, 2022 Form 4 Orders.

This Court DENIES the Motion to Alter and Amend.

IT IS SO ORDERED.

**[JUDGE'S ELECTRONIC SIGNATURE FOLLOWS]**



Richland Common Pleas

**Case Caption:** Rhonda Meisner vs Grant Meisner , defendant, et al  
**Case Number:** 2022CP4001415  
**Type:** Order/Other

So Ordered

Jean H. Toal

Electronically signed on 2023-01-09 16:53:41 page 2 of 2

ELECTRONICALLY FILED - 2023 Jan 10 9:57 AM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415

# Exhibit G

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF RICHLAND )

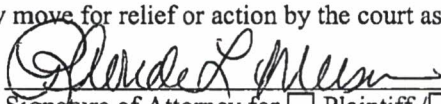
IN THE COURT OF COMMON PLEAS  
5TH JUDICIAL CIRCUIT  
CASE NO.: 2022-CP-40--1415

Rhonda Meisner )  
 )  
 ) Plaintiff, )  
 )  
 ) vs. )

**MOTION AND ORDER INFORMATION  
FORM AND COVERSHEET**

Grant Meisner; Grant Meisner, MD, LLC;  
Sheila Robinson; Erwin Mangubat, MD;  
Moore, Taylor, & Thomas, P.A.; Moore  
Taylor Law Firm, P.A.; Moore Bradley Myers  
Law Firm, PA.; Tricia L. Flowers; Flowers  
Consulting, LLC; Flowers Consulting, LLC;  
Richard G. Whiting, Esquire; Law Offices of  
Richard G. Whiting, PA. John Doe, (1-10) a  
fictional name assigned to identify parties that  
are not yet known or not yet determined. )  
 ) Defendant. )

RICHLAND COUNTY  
FILED  
2023 DEC -1 PM 1:35  
JEANETTE W. MCBRIDE  
CLERK, C.S., & F.C.

Plaintiff's Attorney: Rhonda Meisner, Bar No. n/a Address: PO Box 689 Blythewood, SC 29016 Phone: 803-206-3402 Fax _____ E-mail: scorequipment@gmail.com Other: _____	Defendant's Attorney: James Edward Bradley, Bar No. _____ Address: PO Box 1576 Irmo, South Carolina 29063 Phone: 803-749-8555 Fax _____ E-mail: WARD@MBMLAWSC.COM Other: _____
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: MOTION to alter and amend Rule 60 Estimated Time Needed: 30 MINUTES Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b>	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant	12/1/2023 Date submitted
<b>SECTION III: Motion Fee</b>	
<input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason)	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	

JUDGE'S SECTION	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order.	JUDGE CODE _____
<input type="checkbox"/> Other: _____	Date: _____
CLERK'S VERIFICATION	
Collected by: <u>EM</u>	Date Filed: <u>12/1/23</u>
<input checked="" type="checkbox"/> MOTION FEE COLLECTED: \$ _____	
<input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____	

SCCA 233 (11/2003)

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

Rhonda Meisner

Plaintiff,

v.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.

IN THE CIRCUIT COURT FIFTH JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

**MOTION TO ALTER AND AMEND PURSUANT TO S.C.R.C.P. RULE 60 and (b)**

2023 DEC - 1 PM 1:35  
FILED  
RICHLAND COUNTY  
JEANETTE W. McBRIDE  
CLERK, S.C.

**TO THE HONORABLE JUSTICE JEAN TOAL AND DEFENDANTS Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA. John Doe, (1-10) a fictional name assigned to identify parties that are not yet known or not yet determined.**

**RELEVANT FACTS RELATED TO MISAPPREHENSION BY THE PARTIES OF THIS HONORABLE COURT'S DISMISSAL OF THE COUNTERCLAIMS AGAINST THE PLAINTIFF ENTERED DECEMBER 16, 2022 AND DECEMBER 20, 2022.**

Defendants Tricia L. Flowers and Flowers Consulting, LLC, were default Defendants, at the time of the ruling, and not represented at the hearing December 2, 2022.<sup>1</sup> As such they are still active defendants in the case.

<sup>1</sup> Defendants Flowers Consulting, LLC and Tricia Flowers claimed they were improperly served, and the Court agreed at the July 11, 2023 hearing; however, the Plaintiff maintains they were properly served, despite the denial. Tricia Flowers Company and denied the man claiming to be her husband (to the third- party process server) did not accept service of process for her.

Defendants Sheila Robinson, Grant Meisner, Grant Meisner, MD, LLC and the law firm defendants claimed this Court did not have jurisdiction over the Plaintiff's claims because it was a "continuation of the divorce proceedings" at the hearing on December 2, 2022. Defendant Erwin Mangubat claimed he was insulated from liability, because he was Defendant Grant Meisner's expert witness when he completed an evaluation of Defendant Grant Meisner.<sup>2</sup> Defendants Richard Whiting<sup>3</sup> and the Law Offices of Richard Whiting, LLC claimed they both had quasi-judicial immunity, as a Guardian *ad Litem* appointed by the Court. The Court ruled from the bench that the above Defendants were dismissed; however, the law firm defendants were excluded from the December 15, 2022 Order.

As such, they filed a Motion to Alter and Amend on December 16, 2022. A subsequent Order was filed on December 20, 2022 dismissing the Moore Bradley Myers Law Firm, PA and all related entities.<sup>4</sup>

The Plaintiff filed a Motion to Alter, and Amend on December 26, 2022 based on her misapprehension the Defendant's counterclaims were still active.

Upon receipt of the Moore Bradley Myers, PC Motion to Alter and Amend and the resulting Order, the Defendant filed a second Motion to Alter and Amend, again based on her misapprehension that the Plaintiff's Counterclaims were still active which had apparently "crossed in the mail" based on the date stamped of January 10, 2023 for the Denial of the first Motion to Alter and Amend Denial. The Second Motion to Alter and Amend was date stamped January 11, 2023, which was after the Order, again based on the misapprehension that the counterclaims

---

<sup>2</sup> Defendant Sheila Robinson, as an officer of the Court in an excited utterance during a hearing, stated she never spoke to Erwin Mangubat or his office staff. She has since testified to this fact under oath. Rather, she stated she spoke to the attorney for Prisma Health; however, there is no such

<sup>3</sup> Richard Whiting was substituted as Guardian ad Litem; however, he billed for his services via his law office.

<sup>4</sup> EXHIBIT #1 Form 4 Order of the Court entered December 20, 2022.

against the Plaintiff were still active, *until this Court clarified that all the counterclaims against the Plaintiff had been dismissed by Form 4 Order in December of 2022 and the Plaintiff's Motion to Alter and Amend the Order on January 10, 2023 was denied.*

Defendants Erwin Mangubat, MD, Sheila Robinson, Grant Meisner, Grant Meisner, MD, LLC, Moore Bradley Myers Law Firm, LLC and its related entities continue to participate in further hearings related to the remaining Defendant Flowers Consulting, LLC and Tricia Flowers, to be active, despite the fact the Public Record records them as *inactive participants*.

**BACKGROUND AND BASIS FOR MOTION PURSUANT TO RULE 60 (a)(b)**

The Court held a hearing on several motions on December 2, 2022 and this Court Entered a Form 4 Order on December 15, 2023. A summary of the Orders entered are as follows<sup>5</sup>:

1. Motion to Dismiss (“MTD”) Erwin Mangubat (filed 6/13/22) GRANTED.
2. Motion to Dismiss (“MTD”) Law Office of Richard Whiting (filed 5/2/22) GRANTED.
3. Motion to Dismiss (“MTD”) Richard Whiting (filed 5/2/22) GRANTED.
4. Motion to Dismiss (“MTD”) Sheila Robinson (filed 4/12/22) GRANTED.
5. Motion to Dismiss (“MTD”) Grant Meisner and Grant Meisner, MD, LLC GRANTED.
6. Motion to Quash (“MTQ”) (filed 6/15/22) WITHDRAWN.
7. Motion for Protective Order (“MFPO”) (filed 6/20/22) IS MOOT
8. Motion to Dismiss Counterclaims (“MTDC”) (filed 5/2/22) IS MOOT.
9. Motion to Dismiss (“MTD”) (filed 7/7/22) **IS DENIED, as the parties have been dismissed.**
10. Motion to Dismiss (“MTD”) Erwin Mangubat (filed 7/7/22) GRANTED.
11. Motion to Dismiss (“MTD”) Erwin Mangubat (filed 6/24/22) GRANTED.

---

<sup>5</sup> EXHIBIT 2 Form 4 Order of the Court entered December 15, 2022.

12. Motion for Appointment of Mediator (“MFAM”) (filed 10/11/22) IS **DENIED** as the **parties have been dismissed.**

13. Motion for Affirmative Relief (“MFAR”) (filed 7/2/22) is **DENIED** as the **parties have been dismissed.**

The Defendants Counterclaims against the Plaintiff, pursuant to this Court’s Form 4 Order dismissed the Defendants *and the Counterclaims against the Plaintiff*; however, Defendants Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Erwin Mangubat, M.D., and the Law firm Defendants continue to participate in the case and attend hearings which lead the Plaintiff to believe the Defendants do not understand their counterclaims against the Plaintiff *have been dismissed*, as this Court recently clarified.

Defendants attorneys’ Ward Bradley and Jim Parham participated in the July 11, 2023 hearing remotely.<sup>6</sup>

As such, pursuant to SCRCP Rule 60(a)(b), the Plaintiff respectfully requests the Court to clarify the dismissal of the Defendant’s Counterclaims against the Plaintiff as reflected in the public record, to prevent further involvement of the dismissed Defendants in the proceedings.<sup>7</sup>

#### ARGUMENT

The Plaintiff respectfully avers the Defendant attorney’s continued involvement in this case after the dismissal of their clients and their client’s counterclaims requires a SCRCP Rule 60

---

<sup>6</sup> EXHIBIT #3 Affidavit of Rhonda Meisner.

<sup>7</sup> It is unclear whether attorneys for the Law offices of Richard Whiting and Richard Whiting attended due to problems with the remote hearing as it relates to time and place. The court denied a continuance despite the fact the plaintiff was not given adequate notice and had a previously scheduled work trip to Austin, TX requiring her to participate in the airport without adequate equipment, which the Plaintiff avers the denial of the motion for continuance was in error, but not immediately appealable.

motion to clarify all Defendants counterclaims,(save Tricia Flowers and Flowers Consulting, LLC) have been dismissed.

**PRAYER FOR RELIEF**

1. The Plaintiff requests final clarification that this Honorable Court dismissed the Defendant's Counterclaims (except Tricia Flowers and Flowers Consulting, LLC) on December 15, 2022 and December 20, 2022.
2. The Plaintiff requests the further relief that she not be required to copy the dismissed defendants on further correspondence related to the remaining claims between Tricia Flowers, Flowers Consulting, LLC and the Plaintiff.

December 1, 2023

Respectfully Submitted,



Rhonda Meisner  
PO Box 689  
Blythewood, SC 29016  
scorequipment@gmail.com  
(803)206-3402

# Exhibit H

STATE OF SOUTH CAROLINA  
COUNTY OF Richland  
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2022CP4001415

Rhonda Meisner  
PLAINTIFF(S)

Grant Meisner et al  
DEFENDANT(S)

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

**IT IS ORDERED AND ADJUDGED:**  See attached order (formal order to follow)  Statement of Judgment by the Court:

To the extent the Motion to Alter or Amend Pursuant to SCRPC Rule 60(a) and (b) filed December 1, 2023 is under my authority, I hereby DENY all relief contained in this Motion.

**ORDER INFORMATION**

This order  ends  does not end the case.

See Page 2 for additional information.

**For Clerk of Court Office Use Only**

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 08/16/2024 .

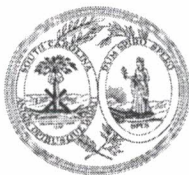
Rhonda Meisner for Rhonda Meisner  
John Doe (1-10)  
Rhonda Meisner for Rhonda Meisner

**NAMES OF TRADITIONAL FILERS SERVED BY MAIL**

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

---



Richland Common Pleas

**Case Caption:** Rhonda Meisner vs Grant Meisner , defendant, et al

**Case Number:** 2022CP4001415

**Type:** Order/Electronic Form 4

So Ordered

Jean H. Toal

Electronically signed on 2024-08-16 16:31:34 page 3 of 3

**RECEIVED**

**Feb 03 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Justice Jean Toal, Circuit Court Judge

Case No. 2024-001626

Rhonda Meisner, ..... Appellant,

vs.

Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;  
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.;  
Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA;  
Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC;  
Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and  
John Doe, (1-10), ..... Respondents.

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**PROOF OF SERVICE**

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I, Lynn G. Ivey, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the following listed documents on Appellant:

1. Motion to Dismiss Appellant’s Appeal;
2. Memorandum in Support of Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA’s Motion to Dismiss Appellant’s Appeal; and
3. Affidavit of James Edward Bradley in Support of Respondents Grant Meisner, Grant Meisner, MD, LLC, Sheila Robinson, Moore Taylor & Thomas, PA, Moore Taylor Law Firm, PA, and Moore Bradley Myers Law Firm, PA’s Motion to Dismiss Appellant’s Appeal.

by email and by depositing a copy of same in the United States Mail, postage prepaid, on February 3, 2025, addressed as follows:

Rhonda Meisner  
PO Box 689  
Blythewood, SC 29016  
[scorequipment@gmail.com](mailto:scorequipment@gmail.com)

  
Lynn G. Ivey



S. Jahue Moore\*  
James Edward Bradley\*  
Sheila McNair Robinson  
Christian G. Spradley  
William H. Edwards  
S. Jahue Moore, Jr.  
William B. Fortino  
Ralph Nichols Riley, Jr.  
John C. Bradley, Jr.  
Lester McGill Bell, Jr.

February 3, 2025

Melissa K. Moore  
Sierra D. Carini  
Lawrence D. Turner  
Emily E. Collins  
Erin R. Conroy

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*Retired*  
J. Mark Taylor\*\*  
Robert D. Hazel†  
C. David Sawyer, Jr.‡  
Billy C. Coleman (1916-2019)  
Stanley L. Myers\* (1976-2023)

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
Via US Mail and Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Re: Rhonda Meisner vs. Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson; Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA; Tricia L. Flowers; Flowers Consulting, LLC; Flowers Consulting, LLC; Richard G. Whiting, Esquire; Law Offices of Richard G. Whiting, PA; and John Doe, (1-10).  
Ct. App. No. 2024-001626

Dear Ms. Kitchings:

I hope you are well. We are filing a Motion for Dismissal, Memorandum in Support, and Affidavit in the above referenced matter by email today. Our firm check in the amount of \$50 is being mailed to your office under cover of this letter.

Please contact our office with any questions or concerns. Thank you for your assistance with this matter.

Sincerely,

Lynn G. Ivey  
Assistant to James Edward Bradley

Enclosure

cc: Rhonda Meisner (US Mail and Email, with enclosures)  
James E. Parham, Esq. (Email only, with enclosures)  
Michael C. Tanner, Esq. (Email only, with enclosures)  
Stephanie H. Burton, Esq. (Email only, with enclosures)

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\*Member of American Board of Trial Advocates \*Fellow of the American Academy of Matrimonial Lawyers \*Fellow, American College of Trial Lawyers †Retired