

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Richland County Circuit Court
The Honorable Jean Toal, retired Chief Justice
2024-001626

Rhonda Meisner,

Appellant,

v.

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

Respondents.

**RETURN TO RESPONDENT RICHARD WHITING'S MOTION TO
DISMISS**

The appellant received the motion to dismiss on January 30, 2025 via email. This return is filed within 10 days of receipt of that motion which is due on February 10, 2025 considering Sunday is the 10th day.

Contrary to the argument of the Whiting respondents, the appeal is timely and not frivolous because at the time this Honorable Court dismissed the appellant's previous appeal there was a SCRPC Rule 52 and Rule 60 motion pending in the circuit court that involved the Whiting Defendants, making the initial appeal untimely because it was filed

before the trial court finally ruled on the January 11, 2023 Motion. A review of the motion filed on January 11, 2023 indicates the appellant requested review of the underlying orders entered on December 15th and 20th . *This Motion was never ruled on.*¹ Also, the Respondent stated the appellant did not “pay” for the \$1,000, but the appellant requested confirmation of the payment by the Whiting Respondents which has not been received.

The later SCRCP Rule 60 (a)(b) was necessary to request action after Justice Toal testified before the judicial merit Selection Committee that all parties and counterclaims were dismissed on December 15th and December 20th, 2022 and there were no outstanding motions that *had not been* ruled on and that she reviewed the filings in the case. This statement was inaccurate. The Meisner, Mangubat, and Law Firm Defendants continued to participate in hearings throughout the summer of 2023, including a hearing where it appeared the Honorable Jocelyn Newman addressed Ward Bradley after the hearing was over giving the appearance of *ex parte* communications.

The Whiting Defendants are also part of the appeal because contrary to the Whiting Respondent’s assertions they are part of the request for the appeal to be consolidated based on a Motion to Amend the Amended Complaint that was interlocutory, but now part of the appeal of the underlying orders. A Motion to consolidate the appeals is pending now that all outstanding motions (save Jan11) have been ruled on.

Finally, the appellant avers the setting aside of the default defendants Tricia Flowers and Flowers consulting, LLC was in error because a party’s affidavit cannot overcome a third party process servers affidavit of service, like the Honorable Jocelyn

¹ EXHIBIT 1 letter regarding motion to alter and amend that was scheduled for the July 11, 2023 as part of motion for continuance.

Newman ruled.

Correction of Facts submitted with regard to lower court filings

Defendant Richard Whiting and the Law Office of Richard Whiting (“Whiting”) Defendants’ facts section in the lower court stops at January 10, 2023; however, the very next day, on January 11, 2023, a SCRPC Rule 52 & Rule 60 motion was entered by the court on January 11, 2023 that was filed by mail on January 7, 2023.² p.2 ¶12 Defendant Whiting’s Motion to Dismiss. As such, an outstanding motion to alter and amend pursuant to Rule 52 and SCRPC Rule 60 was pending in the lower court that involved the Whiting Defendants when the initial appeal was filed, out of caution by the Appellant.

The Rule SCRPC 52 and Rule 60 motion was timely and tolled the time to appeal until an order resolving this motion was acted on. The motion sought to call attention to the fact Tricia Flowers and Flowers Consulting, LLC (“Flowers”) Defendants were default defendants because they did not answer the complaint or the amended complaint and were involved with the civil conspiracy and abuse of process claims that both Whiting and Mangubat defendants were alleged to have participated in, along with the presence of Doe defendants.³

ARGUMENT IN OPPOSITION OF DISMISSAL

The appellant avers the appeal is proper and not frivolous because at the time the original appeal was determined to be “untimely” there was a still a pending SCRPC Rule 52, and Rule 60 motion in the lower court that was not yet ruled on. That motion remains

² SCRPC Rule 52 and Rule 60 motion that was filed by mail and was intended to draw to the attention of the court that there was a default defendant that was the agent of some of the other defendants and was part of the claims that involved the Whiting Defendants including civil conspiracy and abuse of process.

³ EXHIBIT # 2 Motion to Reconsider pursuant to Rule 52 and Rule 60 which was filed within 10 days of receipt of the changed order entered on December 20, 2022 received on December 28, 2022. Tricia Flowers affidavit in support of her Motion to Set aside her default provides evidence of the acts associated with the Whiting Defendants conspiracy to which he was alleged to have participated.

outstanding; however, a second Rule 60 (b) motion filed on December 1, 2023 was finally acted on in August of 2024 by the Honorable Jean Toal. The Appellant brought up the outstanding SCRCF Rule 60(a) (b) motions and upon information and belief, a different judge reviewed the filings.

Post-trial motions are *required* in two primary circumstances: to preserve issues that have been raised to the trial court *but not yet ruled* on or when the trial court grants relief not requested or rules on an issue never rose at trial. Jean Hoefler Toal, et al, Appellate Practice in South Carolina pp59-60 (2d ed. 2002)

Both the Appellant (December 29, 2022) and the Law Firm Respondents (December 16, 2022) filed a motion to alter and amend pursuant to Rule 59 which tolled the time to appeal. All of the orders in this case were issued on a Form 4 without making findings of fact or conclusions of law. One issue presented to the Court by the Appellant was the fact there were Doe defendants and the Flowers Defendants were default defendants that never answered the Complaint or the Amended Complaint. All defendants were involved in the civil conspiracy and abuse of process claims, including the Whiting, Mangubat, and Law Firm defendants.

On January 7, 2023 the Appellant filed a Motion to alter and amend pursuant to Rule 52 and Rule 60 because the Form 4 received on December 28, 2022 failed to address the Doe Defendants and the default status of the Flowers defendants or the agency and co-conspirator relationship with the other defendants.

Justice Toal, after the appellant complained of her not acting on the outstanding January 11, 2023 motion stated before the judicial merit selection committee "I reviewed the index and there were *no outstanding motions*" or words to this effect. This was inaccurate because the February 7, 2023 motion that was filed via U.S. Mail was stamped

on February 11th of 2023. The certificate of service requested the court to place a stamped copy in the Honorable Jean Toal's mailbox at the courthouse. This motion was on the index since it was stamped on February 11, 2023.

To the extent Justice Toal did not specifically rule on the February 11, 2023 motion, after her testimony before the judicial merit selection committee, the appellant filed a second Rule 60 (a) (b) motion, in an attempt to get a ruling. This appeal follows the denial of that motion.

In actions tried without a jury, a party may move the court to amend its findings or judgment or for a new trial not later than 10 days after **receipt** of written notice of entry of judgment. Rule 52 (a) SCRPC. Pursuant to Rule 60(b), SCRPC, a court may relieve a party of a final judgment for mistake, inadvertence, surprise, or excusable neglect so long as the relief sought is filed no more than one (1) year from the date of judgment. "This rule is an appropriate remedy for good faith mistakes of fact if all other applicable factors are met." Hillman v. Pinion, 347 S.C. 253, 256, 554 S.E.2d 427, 429 (Ct. App. 2001). The motion to alter and amend pursuant to Rule 52, and Rule 60 filed on January 11, 2023 was a request to correct a *mistake of fact* and to correct the fact section to *get a ruling* on the Flowers Defendants default status. The Motion to alter and amend also sought clarification of the trial court's comments that the January 11, 2023 motion was *not* outstanding ruling based on the comments of the Honorable Jean Toal.

Parties risk not getting a ruling from the court and therefore losing preservation of issue on appeal. Clearly, the Court was confused about the outstanding motion and even stated under oath that there were no outstanding motions. Clearly, the motion was not entered into the court until the 11th so the ruling by the Honorable Jean Toal did not include that motion.

. In determining whether to grant relief under Rule 60(b) (1), the court must consider

the following factors: “(1) the promptness with which relief is sought; (2) the reasons for the failure to act promptly; (3) the existence of a meritorious defense; and (4) the prejudice to the other party.” Micronics, Inc. v. S.C. Dep't of Revenue, 345 S.C. 506, 510–11, 548 S.E.2d 223, 226 (Ct. App. 2001). Rouvet v. Rouvet, 388 S.C. 301, 309, 696 S.E.2d 204, 208 (Ct. App. 2010).

Here, it is clear the plaintiff, because of the outstanding motion to alter and amend pursuant to SCRCP Rule 52 and SCRCP Rule 60 and the trial court thought all motions were disposed of requiring the Motion to Alter and Amend pursuant to SCRCP Rule 60 (b). The appellant avers (1) she was timely filing the second motion because the first motion was *still pending* (2) the reason was the court still had not ruled on the outstanding motion (3) which is a meritorious defense coupled with the fact that South Carolina adopted the minority view where spouses can sue each other (4) this motion was brought within one year.

During the hearing on December 2, 2022. None of the defendants brought to the attention of the Court that the Flowers Defendants were in default because they did not answer either the complaint or the amended complaint and they were included in the claims against them via the Flowers agency relationship with the attorneys and Meisner defendants. The Plaintiff argued this fact during the hearing regarding the Flowers defendants but the court did not address this issue in either the Dec 15th or the Dec 20, 2022 order.

The motion to reconsider her order dismissing the attorneys included a request to reconsider her previous ruling that had been tolled when the law firm defendants filed their motion to alter and amend. The agency relationship between the attorney defendants and the co-conspirator allegations of the remaining defendants in the civil conspiracy and abuse of process is good cause to request the Court to review her dismissal because they too were implicated in those claims. The Meisner defendants the attorney defendants and the Whiting

defendants were all named in the civil conspiracy and abuse of process claims along with the agency relationship.

A timely post-trial motion, including a motion to alter or amend the judgment pursuant to Rule 59(e), SCRCF, stays the time for an appeal for *all parties* until receipt of written notice of entry of the order granting or denying such motion. See Rule 203(b) (1), SCACR; Rules 50(e), 52(c), and 59(f), SCRCF

As a result, despite the fact the January 11, 2023 motion was not ruled on the Motion to Alter and Amend pursuant to Rule 60 (b) which was filed prior to one year makes this appeal timely and it involves the Whiting Defendants. This appeal was filed when the motion was finally ruled on. Finally, there was a motion to alter and amend the amended complaint that involves all the defendants, that is interlocutory and now under consideration. Because the complaint names Doe defendants had the Flowers defendants not been rescued from default, the Whiting defendants could be renamed because the claims associated with the motion were against the Whiting defendants specifically. For the above reasons the appellant respectfully requests the appeal not be dismissed because it is timely and was not brought in bad faith, but has important claims where a jury demand is available.

Respectfully Submitted,

February 9, 2024



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

EXHIBIT #1

RE: MOTION FOR CONTINUANCE PROPOSED ORDER ATTACHED

From Rhonda Lewis Meisner <scorequipment@gmail.com>

Date Wed 7/5/2023 12:12 PM

To Ward Bradley <ward@mbmlawsc.com>; sburton@gibbesburton.com <sburton@gibbesburton.com>; James Parham <jparham@jparhamlaw.com>; michaelctannerllc@bellsouth.net <michaelctannerllc@bellsouth.net>; Shanon Peake <shanonp@smithrobinsonlaw.com>; murrell@smithrobinsonlaw.com <murrell@smithrobinsonlaw.com>; michael.c.tannerllc@bellsouth.net <michael.c.tannerllc@bellsouth.net>; jnewmanlc@sccourts.org <jnewmanlc@sccourts.org>; Gmail <scorequipment@gmail.com>

3 attachments (1 MB)

letter to Judge Newman and law Clerk re continuance.pdf; Motion for entry of default filed.pdf; motion to dismiss counterclaims of Tricia Flowers and Flowers consulting.pdf;

Good afternoon Judge Newman and Judge Newman's Law Clerk,

Please find attached the Motion for a Continuance that was filed on Monday due to out of town work travel scheduled along with the filings should Judge Newman not grant the continuance.

Please notice one of the scheduled motions (a Motion to Alter and Amend) can only be heard by Justice Jean Toal.

Jan 11, 2023 motion to Alter & Amend

Regards,

Sent from Mail for Windows

Rhonda Meisner, principal
S.C.O.R.E., L.L.C.
Post Office Box 689
Blythewood, South Carolina 29016
scorequipment@gmail.com
(803)333-9900 office
(803)206-3402 personal cell phone

From: Rhonda Lewis Meisner

Sent: Monday, July 3, 2023 2:51 PM

To: Ward Bradley; sburton@gibbesburton.com; James Parham; michaelctannerllc@bellsouth.net; Shanon Peake; murrell@smithrobinsonlaw.com; Gmail; michael.c.tannerllc@bellsouth.net

Subject: MOTION FOR CONTINUANCE PROPOSED ORDER ATTACHED

Good afternoon,

Please see the attached proposed order and motion. I will file them later today.

Warm regards,

Sent from Mail for Windows

Rhonda Meisner, principal
S.C.O.R.E., L.L.C.
Post Office Box 689
Blythewood, South Carolina 29016
scorequipment@gmail.com
(803)333-9900 office
(803)206-3402 personal cell phone

Exhibit # 2

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.)

2023 JAN 11 AM 11:53
JANETTE W. MERRIN
C.C.P., G.S., & F.C.
RICHLAND COUNTY
FILED

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: _____
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MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

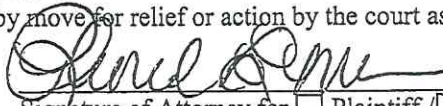
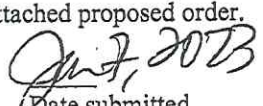
SECTION I: Hearing Information

Nature of Motion: MOTION to ALTER AND AMEND
 Estimated Time Needed: 1 HOUR Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type

Written motion attached
 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 Plaintiff / Defendant Date submitted

SECTION III: Motion Fee

PAID - AMOUNT: \$ _____
 EXEMPT: (check reason)

Rule to Show Cause in Child or Spousal Support
 Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRPC)
 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: _____
 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>RM</u> Date Filed: <u>1/11/23</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 52 and
Rule 60**

2023 JAN 11 AM 11:53
JANET M. NEEDLE
C.C.P., E.C., & F.C.

RICHLAND COUNTY
FILED

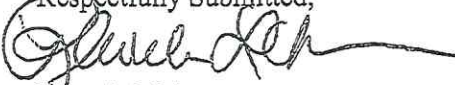
**TO THE DEFENDANTS Grant Meisner; Grant Meisner, MD, LLC; Sheila Robinson;
Erwin Mangubat, MD; Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.;
Moore Bradley Myers Law Firm, PA.; Tricia L. Flowers; Flowers Consulting, LLC;
Flowers Consulting, LLC; Richard G. Whiting; Esquire; Law Offices 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.**

The Court's second Form 4 was received on December 28, 2022, this motion is filed via U.S.
mail within 10 days of the receipt.

The Defendant respectfully reiterates her arguments advanced in the initial motion to
alter and amend filed with the Court and further argues that the law firm defendants either
employ or contract with Defendants Sheila Robinson, Tricia L. Flowers, and Flowers Consulting,
LLC. Additionally, Sheila Robinson, and /or the Law Firm Defendants, upon information and
belief, hired Tricia L. Flowers and Flowers Consulting, LLC and is responsible for her acts and
omissions. Upon information and belief, Tricia L. Flowers was acting based on the instructions
given her which were outside of her rights as a process server. Tricia L. Flowers and Flowers

Consulting, LLC failed to answer the complaint or the amended complaint and as such are in default. The plaintiff points to the complaint, the amended complaint, her response to all defendant's motions to dismiss and the previous motion to alter and amend along with the arguments advanced in the hearing on the Defendant's motion to Dismiss and requests this Court to reconsider its dismissal of the Law Firm Defendants Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA. and respectfully request the Court to enter an Order requiring the Defendants to participate in discovery proceedings and Order a mediator be appointed.

January 7, 2023

Respectfully Submitted,

Rhonda Meisner
PO Box 689
Blythewood, SC 29016
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, 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

**DECLARATION OF RHONDA MEISNER
PURSUANT TO 28 U.S.C. § 1746 IN
SUPPORT OF HER MOTION TO ALTER
AND AMEND THE FORM 4 JUDGMENT
ENTERED BY THE HONORABLE JEAN
TOAL**

My name is Rhonda Meisner and I am the plaintiff in this case and over 18 years of age and competent to submit this declaration pursuant to 28 U.S.C. §1746.for the truth of the matters contained herein except for those matters submitted upon information and belief and I believe those facts to be true as well. I submit the following facts true and subject to penalty of perjury.

1. The Court held a hearing on December 2, 2022 on the Defendant's Motions to Dismiss.
2. I did not see Defendants Grant Meisner, Richard G. Whiting, or Erwin Mangubat, MD at that hearing.
3. I previously filed an affidavit of Default for Defendant Tricia L. Flowers and submitted the affidavit of Grindstone Process servers, Stacey Rose in support of Tricia L. Flowers proper service.

4. Upon information and belief, Sheila Robinson and/or one of the law office defendants Moore, Taylor, & Thomas, P.A.; Moore Taylor Law Firm, P.A.; Moore Bradley Myers Law Firm, PA hired Ms. Flowers and/or Flowers Consulting, LLC.

Further declarant sayeth not and the above facts are submitted pursuant to penalty of perjury and was scribed this 7th Day of January 2023.



Rhonda Meisner

Rhonda Meisner SC DL # ending in 1138



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

ELECTRONICALLY FILED - 2022 Dec 20 9:08 AM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415

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

FORM 4

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

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 SECOND MOTION TO ALTER AND AMEND

2023 JAN 9 1 AM 11:54
RICHLAND COUNTY
FILED
JEANETTE J. MARRIAGE
C. CLERK, JR.
CLERK, S.C. JUDICIAL SYSTEM

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, accompanied by a declaration by the plaintiff, 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,

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

January 7, 2023

RECEIVED

Feb 10 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Richland County Circuit Court
The Honorable Jean Toal, retired Chief Justice
2024-001626

Rhonda Meisner,

Appellant,

v.

Grant Meisner, Grant Meisner,
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Flowers Consulting, LLC; Richard
G. Whiting, Esquire; Law Offices of
Richard Whiting, P.A.; John Doe
(1-10) a fictional name assigned to
identify parties that are not yet
known or not yet determined.

Respondents.

**PROOF OF SERVICE-RETURN TO WHITING'S MOTION TO
DISMISS**

Rhonda Meisner has electronically filed her RETURN and proof of service and copied the following attorneys emailing michaelctannerllc@bellsouth.net; sburton@gibbesburton.com; ward@mbmlawsc.com; jparham@jparhamlaw.com; scorequipment@gmail.com; murrell@smithrobinsonlaw.com; ward@mbmlawsc.com; shanon.peake@smithrobinsonlaw.com; Additionally, I mailed a copy postage prepaid by U.S. mail to : James Edward Bradley Post Office Box 5709 W.Columbia, SC 29171 Stephanie Burton 308 E. Saint John Street Spartanburg, SC 29302 James Parham PO Box 1576 Irmo, SC 29063 Michael C. Tanner PO Box 1061 Bamberg, SC 29003 and Shannon Peake 2530 Devine Street Columbia SC 29205.

February 9, 2025

Rhonda Meisner


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