

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,
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 RESPONDENTS ERWIN MANGUBAT'S MOTION TO
DISMISS**

The appellant received the motion to dismiss on February 4, 2025 via email. This return is filed within 10 days of receipt of that motion which is due on February 14, 2025.

Contrary to the argument of the above named respondents, the appeal is timely and not frivolous because at the time this Honorable Court dismissed the appellant's previous appeal there was a timely filed pending SCRCF Rule 52 and Rule 60 motion in the circuit court that involved the *all* Defendants, and was specifically sent to the Mangubat attorneys, making the initial appeal untimely and interlocutory 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 timely filed but never ruled on.*¹ This Honorable Court should deny the Respondent's Motion to Dismiss because the underlying appeal involves the Respondent in not only the civil conspiracy and other claims, but specifically whether he was a properly defined expert witness is related to the extrinsic fraud perpetrated by attorney Sheila Robinson, which the subject of a motion to amend the amended complaint. Extrinsic fraud allows for an independent claim in equity, even after judgment.

The later SCRCF 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 because not only were there Doe Defendants and Default Defendants, there was an outstanding motion to alter and amend pursuant to SCRCF Rule 52 and Rule 60. In fact, the Clerk of Court based on the outstanding motion filed a notice hearing for the motion that upon information and belief was continued on three occasions, as it could only be heard by Justice Toal. The Meisner, Mangubat, and Law Firm Defendants continued to participate in hearings throughout the summer of 2023, including a hearing on July 11, 2023 where it appeared the Honorable Jocelyn Newman addressed Ward Bradley after the hearing was over giving the appearance of *ex parte* communications.

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

The above named Respondents are also part of the appeal because contrary to the 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 Jan 11th) have been ruled on.

Finally, the appellant avers the setting aside of the default defendants Tricia Flowers and Flowers consulting, LLC was in error for several reasons but mainly because a party's affidavit cannot overcome a third party process servers affidavit of service, independent evidence, and secretary of state filings, like the Honorable Jocelyn Newman ruled.

Correction of Facts submitted with regard to lower court filings

Respondent's fact section 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 Meisner'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 above named Respondents when the initial appeal was filed prematurely, out of caution by the Appellant.

The Rule SCRPC 52 and Rule 60 motion was timely filed and tolled the time to appeal *for all parties*, until an order resolving this motion was acted on. The motion sought to call to the court's attention to the fact Tricia Flowers and Flowers Consulting, LLC ("Flowers") Defendants were default defendants because they did not answer the

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.

complaint or the amended complaint on December 2, 2022 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 and tolled the time to appeal for all parties. Additionally, Respondent Mangubat was not dismissed with prejudice and there were other Doe and Default defendants making his dismissal interlocutory. The February 11, 2023 motion remains 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 SCRPC 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 Hoefer 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. These motions were to reconsider the December 15, 2022 order (not the December 20, 2022 order) The appellant filed a Motion to Alter and Amend pursuant

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 above named Defendants conspiracy to which he was alleged to have participated.

to Rule 52 and Rule 60 once the second form 4 that included the law firm defendants was filed, but requested reconsideration of the December 15, 2022 order as well. All of the orders in this case were issued on a Form 4 without making findings of fact or conclusions of law or designating they were filed with prejudice, making them interlocutory because of the Doe Defendants and the Default Defendants. 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, Meisner, and Law Firm defendants. All Defendants were dismissed without discovery based on their claims of affirmative defenses; however, none of the dismissals were *with prejudice*, including Dr. Mangubat and there was an outstanding motion to reconsider the Court's ruling at the time of the premature appeal.

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 and continued by at least 2

judges.

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) SCRCP. Pursuant to Rule 60(b), SCRCP, 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, because of the outstanding motion to alter and amend pursuant to SCRCF Rule 52 and SCRCF Rule 60, the trial court’s failure to rule, and Justice Toal’s testimony that all motions were disposed of required filing the second Motion to Alter and Amend pursuant to SCRCF Rule 60 (b). The appellant avers (1) she timely filed the second motion because the first motion was *still pending* (2) the good faith reason is 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 complaint⁴ or the amended complaint and they were included in the claims against them via the Flowers agency relationship with the attorneys and Meisner defendants and conspiracy with the other 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 for all parties 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

⁴ The Flowers Defendants have still not answered the complaint, upon information and belief. They only answered the Amended Complaint.

were implicated in those claims. The Meisner defendants, the Mangubat, the attorney defendants, and the Whiting defendants were all named in the civil conspiracy and abuse of process claims based on the agency relationship and the co-conspirator designation.

A timely post-trial motion, including a motion to alter or amend the judgment pursuant to Rule 59(e), SCRPC, 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), SCRPC

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) was required which was filed prior to one year makes this appeal timely and it involves the above named 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 other defendants/respondents could be renamed because the claims associated with the motion were against the above respondents, specifically. For the above reasons the appellant respectfully requests the appeal not be dismissed because it is timely and the previous pre-mature appeal 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

Outlook

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; 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
Plythwood, South Carolina 29016
scorequipment@gmail.com
(03)333-9900 office
(03)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

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 L. W. McNEEL
C.C.P. & F.D.

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

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, P.A.; 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

CERTIFICATE OF SERVICE SECOND MOTION TO ALTER AND AMEND

+

2023 JAN 11 AM 11:51
FILED
RICHLAND COUNTY
JANET E. McBRIDE
Clerk of Court, 5th J.C.

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, P.A., 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,
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.

**PROOF OF SERVICE-RETURN TO MANGUBAT'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 10, 2025



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