

RECEIVED

Feb 24 2025

SC Court of Appeals

Exhibit A

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND)	
Rhonda Meisner,)	C/A No. 2022-CP-40-01415
)	
Plaintiff,)	
)	
vs.)	MOTION TO DISMISS
)	
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.)	

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
***Attorney for the Defendants Grant Meisner, MD
and Grant Meisner, MD, LLC***

West Columbia, South Carolina

April 6, 2022

Exhibit B

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)

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

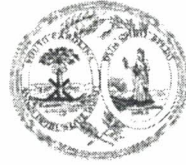
This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 12/14/2022 .

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

Exhibit C

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: _____	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. ABERNETHY
C.C.R., G.S., & F.C.

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 Rhonda 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

(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

^B
~~EXHIBIT A~~ 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
Scribed + 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, 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

AFFIDAVIT OF DEFAULT FOR
TRICIA I. 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. ¹ 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.

¹ 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.²
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 29170.³
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

Clayton Carimi

Notary for the State of South Carolina

My commission expires on 22nd day of November 20 23.



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

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

EXHIBIT #1

5546 9628 0002 0736 9452

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

For delivery information, visit our website at www.usps.com

West, Columbia, SC 29171

OFFICIAL USE

Certified Mail Fee \$3.75
 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

0016 07
 Postmark Here
 05/16/2022

Sent to: James Edward Bradley Moore Brad
 Street and Apt. No. or PO Box No. P.O. Box 3109
 City, State, ZIP+4 West Columbia, SC 29171

2552 9628 0002 0736 9552

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

For delivery information, visit our website at www.usps.com

West, Columbia, SC 29171

OFFICIAL USE

Certified Mail Fee \$3.75
 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

0016 0
 Postmark Here
 05/16/2022

Sent to: James Edward Bradley Moore Brad
 Street and Apt. No. or PO Box No. P.O. Box 3109
 City, State, ZIP+4 West Columbia, SC 29171

2241 2720 0002 0736 9442

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

For delivery information, visit our website at www.usps.com

Col, Columbia, SC 29171

OFFICIAL USE

Certified Mail Fee \$3.05
 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 \$5.36

0016 07
 Postmark Here
 05/16/2022

Sent to: Erin Manabat MD
 Street and Apt. No. or PO Box No. 3 Richard Medical Park Suite 310
 City, State, ZIP+4 Columbia, SC 29203

5545 2720 0002 0736 9545

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

For delivery information, visit our website at www.usps.com

Bluffton, SC 29166

OFFICIAL USE

Certified Mail Fee \$3.05
 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 \$11.50

0016
 Postmark Here
 05/16/2022

Sent to: Grant Weisner
 Street and Apt. No. or PO Box No. 1012 Chestnut Road
 City, State, ZIP+4 Bluffton, SC 29166

6956 9628 0002 0736 9459

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

For delivery information, visit our website at www.usps.com

West, Columbia, SC 29171

OFFICIAL USE

Certified Mail Fee \$3.05
 Extra Services & Fees (check box, add fee as appropriate)
 Return Receipt (hardcopy) \$0.00
 Return Receipt (electronic) \$9.75
 Certified Mail Restricted Delivery \$0.00
 Adult Signature Required \$0.00
 Adult Signature Restricted Delivery \$0.00

Postage \$8.70
 Total Postage and Fees \$11.50

0016 07
 Postmark Here
 05/16/2022

Sent to: Tracie E. Howard
 Street and Apt. No. or PO Box No. 614 Fernside Drive
 City, State, ZIP+4 West Columbia, SC 29171

6439 2720 0002 0736 9439

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

For delivery information, visit our website at www.usps.com

West, Columbia, SC 29171

OFFICIAL USE

Certified Mail Fee \$3.05
 Extra Services & Fees (check box, add fee as appropriate)
 Return Receipt (hardcopy) \$0.00
 Return Receipt (electronic) \$9.75
 Certified Mail Restricted Delivery \$0.00
 Adult Signature Required \$0.00
 Adult Signature Restricted Delivery \$0.00

Postage \$2.56
 Total Postage and Fees \$5.36

0016
 Postmark Here
 05/16/2022

Sent to: Shela Robinson Moore Br
 Street and Apt. No. or PO Box No. P.O. Box 3109
 City, State, ZIP+4 West Columbia, SC 29171

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 Melsner		Defendant / Respondent: Grant Melsner; Grant Melsner, MD, LLC; Sheila J 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, 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. Melsner	
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;


Stacey Rose
Date: 6/4/22

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.


Notary Public
Date: 6/6/22



South Carolina Secretary of State

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, 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

**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) 906-3408

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

cc. VIA email with motion attached to ward@mbmsc.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 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 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



JEANETTE W. McBRIDE
C.C.R., G.S., & F.C.

2022 NOV 21 AM 9: 09

RICHLAND COUNTY
FILED

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

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

2022 NOV 21 AM 9:10
JEANETTE W. MCBRIDE
C.C.P. G.S. & F.C.

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



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)

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 8/15/22) 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.

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



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

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 V. MOBRIDA
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,



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

December 27, 2022

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
Total Cases:	1	\$25.00	\$25.00	\$0.00

Exhibit D

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.; 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.

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

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

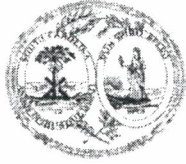
**ORDER DENYING PLAINTIFF'S
MOTION TO ALTER AND AMEND**

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

Exhibit E

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

NOTICE OF FILING AND NOTICE OF

LIS PENDENS

+

JEANETTE W. McBRIDE
CLERK, S.C. J.C. & F.C.
2023 NOV 27 AM 11:25

RICHLAND COUNTY
FILED

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

WHEREAS, Ethel Eargle Monts f/k/a Ethel Eargle Abney acquired title to the below describe property by dead of Patrick Eargle dated January 24, 1929, reordered March 12, 1929 in Dead Book DF at page 194; and

WHEREAS, Ethel Abney Monts conveyed from the above property 5.0 acres to Delmar L. Roberts by deed recorded February 3, 1975 in Deed Book D-339 at page 304 and also 5,0 acres to Dalmar L. Roberts by deed recorded June 4 1980 in Deed Book D-542 at page 79; and

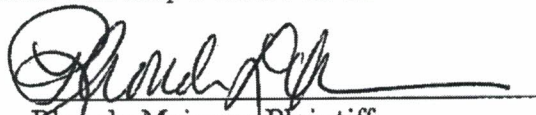
WHEREAS, Ethel Abney Monts died testsate on January 13, 1993 owning the below describe real property; and

WHEREAS, the last Will and Testament of Ethel Abney Monts directed that title to any real property owned by her at her death would vest in her Personal Representative who was vested with the authority to sell the real property; and WHEREAS, Carole H. Gunter was named as Personal Representative of the Last Will and Testament of Ethel Abney Monts and she has been appointed the personal Representative of the Estate of Ethel Abney Monts as will appear in estate file 93-Es- 32-00076, Office of the Probate Judge for Richland County; and

WHEREAS, The Estate of Ethel Abney Monts by Carole H. Gunter , as Personal Representative has agreed to sell the below describe real property to Grant R. Meisner.

NOW, THEREFORE, KNOW ALL MEN BE THESE PRESENTS That Carole H. Gunter , as Personal Representative of the Estate of Ethel Abney Monts (hereinafter called "Grantor") in the state aforesaid , for and in consideration of the sum of NINETY-FOUR THOUSAND EIGHT HUNDRED THIRTY-FIVE AND 88/100 (\$94,835,88) Dollars to the Grantor in hand paid at and before the sealing of these presents by Grant R. Meisner (hereinafter called "Grantee") in the State aforesaid (the receipt of which is hereby acknowledge), has granted , bargained , sold , and released and by present does grant, bargain, sell, and reiease, unto the Grantee, his heirs successors ,and assigns:

All that certain piece, parcel or lot of land, with improvement thereon, lying, being and situate in the County of Richland, near Blythewood, State of South Carolina, containing 55.716 acres, more or less, and the same being shown on a plat prepared for Grant R. Meisner by Baxter Tax Map # 10100-02-12



Rhonda Meisner, Plaintiff

PO Box 689

Blythewood, SC 29016

scorequipment@gmail.com

(803)206-3402

November 22, 2023

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

NOTICE OF FILING AND NOTICE OF

LIS PENDENS

2023 NOV 27 AM 11:25
JEANETTE W. McBRIDE
C.C.P. S.S. & F.C.

RICHLAND COUNTY
FILED

+

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

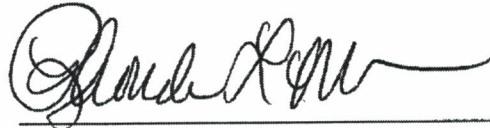
NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

All that certain piece, parcel or lot of land, with improvement thereon, if any, situate lying and being in the County of Richland, State of South Carolina, being shown and delineated as Tract B on plat of Estate of Mayre Wall Eargle dated August 5, 1986 and recorded in Plat Book 51 at Page 5044 and being further shown and delineated as 38.486 acres on plat prepared for Grant R. Meisner by Bostick Surveying dated November 28, 1989 and recorded in Plat Book 53 at Page 250, RMC Office for Richland County, and having the following boundaries and

measurements according to said latter plat, to-wit: Beginning at iron at the intersection of the right-of-way of U.S. HWY, 321 and the South Western Corner of said property and running N28.56'05"E for a distance of 2162.91' to an iron; thence turning and running S13.00'46"W for a distance of 44.96', to an iron; thence turning and running S69.51'4E" for a distance of 497.94' to an iron; thence turning and running S22.31'24"W for an aggregate distance of 725.55', to a concrete monument; thence turning and running S13.00'46W for a distance of 94.81', to an iron; thence turning and running N59.07'44"W for a distance of 178.97', to and iron; thence turning and running N59.43'32"W for a distance of 876.74' to an iron; and the point of commitment.

This being a portion of the identical property devised to Dolan Hoye Eargle, Jr and Stephen Taber Eargle under the Last Will and Testament of Mayre Wall Eargle and an exemplified copy of said Last Will and Testament being filed in the Office of the probate Court of Richland County as file 90-ES-40-0004 and being further described in a Deed from Dolan Hoye Eargle, Jr. as Executor and Stephen Taber Eargle as Executor to Dolan H. Eargle, Jr dated February 19, 1987 and recorded February 26, 1987 in Deed Book D-831 at Page 804 and being further described in a Corrective Deed from Stephen Taber Eargle to Dolan Hoye Eargle Jr. dated April 6, 1990 and recorded April 19, 1990 in Deed Book D-975 at Page 653 RMC Office for Richland County.

TMS NO: 10100-02-46



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

November 22, 2023

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

NOTICE OF FILING AND NOTICE OF

LIS PENDENS

+

2023 NOV 27 AM 11:25
RICHLAND COUNTY
FILED
JEANETTE W. MCBRIDE
Clerk P.G.S., S.C.

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

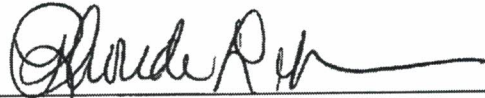
NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

ALL THAT CERTAIN piece, parcel or lot of land, with improvements thereon, if any, situate, lying and being in the County of Richland, State of South Carolina and being more fully shown and delineated as Tract A, Containing 38.409 acres on a plat prepared for the Estate of Mayre Wall Eargle by Bostick Surveying dated August 6, 1986 and recorded in plat book 51, page 5044.

This being the same property conveyed unto Stephen Taber Eargle by deed of the Estate of Mayre Wall Eargle dated February 19, 1987, and recorded in deed book 831, page 802 and corrective deed dated January 16, 1990 recorded in book D-976, page 652.

TMS:10100-02-47

November 22, 2023

A handwritten signature in black ink, appearing to read "Rhonda Meisner", written over a horizontal line.

Rhonda Meisner, Plaintiff
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

NOTICE OF FILING AND NOTICE OF

LIS PENDENS

+

JEANETTE W. MCBRIDE
C.C.R. O.S. #10

2023 NOV 27 AM 11:25

RICHLAND COUNTY
FILED

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

All that certain piece, parcel or lot of land, together with improvements thereon situate, lying and being near the City of Columbia, in the County of Richland, State of South Carolina, being shown and delineated as Lot 148, on Bonded Subdivision Plat of Blythe Creek by United Design Services, Inc, dated July 18, 2007, and recorded in the Office and the Register of Deeds for Richland County in Record Book 1352 at Pages 1403 and 1404. Being further shown on plat made for Ashton E. Williams by Ben Whetstone Associates, dated January 24, 2015, and recorded in Record Book 2009 at Page 1765; having the boundaries and measurements as shown on said plat, reference being craved thereto for a more complete and accurate legal description.

This being the same property conveyed to the within named Grantor by deed of Eric T. Simpson, dated February 27, 2015, and recorded in Record Books 2009 at Page 1768.

TMS NO:15208-01-36

A handwritten signature in black ink, appearing to read 'Rhonda Meisner', written over a horizontal line.

Rhonda Meisner, Plaintiff

PO Box 689

Blythewood, SC 29016

scorequipment@gmail.com

November 22, 2023

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

NOTICE OF FILING AND NOTICE OF

LIS PENDENS

2023 NOV 27 AM 11:25
JEANETTE W. MCBRIDE
C.C.P. G.S. & E.C.

RICHLAND COUNTY
FILED

+

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

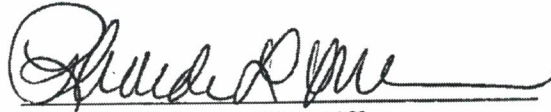
All those certain piece, parcels or tracts of land, containing in the aggregate 48.71 acres of land, with the improvements thereon, situate, lying and being North of the U.S. Highway 321, in the Country of Richland, State of South Carolina, and being shown and delineated as PARCEL "A" containing 42.87 acres, PARCEL "B" containing 5.57 acres, and PARCEL "C" containing 0.27 acre, on a plat prepared for Grant R. Meisner, by James F. Polson, Registered Land Surveyor, dated April 28, 1988, to be filed in the Office of the R.M.C for Richland County. According to said plat, Parcel "A" has the following metes and bounds: Beginning at an old iron pin in the road bed of Old U.S Highway 321 and runs North 0 13' 34' West for a distance of Two Hundred Seventy and Twenty-Seven Hundredths (270.27) feet to an iron; thence runs North 8 35' 30" East for a distance of Two Hundred Seventy and

Twenty-Seven Hundredths (270.27) feet to and iron; thence runs North 8 35' 30" East for a distance of Two Hundred Seventy-Two and Thirteen Hundredths (272.13') feet to an iron; thence turns and runs North 9 49' 41" East for distance of One Hundred Two and Thirty-Four Hundredths (102.34') feet to an old iron; thence turns and runs North 15 20' 09" East for a distance of Seven Hundred Fifty-Eight and Twenty Nine Hundredths (758.29') feet to an old iron; thence turns and runs North 21 21' 46" East for a distance of Two Hundred Eight-Six (286.00') feet to an old iron; thence turns and runs North 17 14' 21" East for a distance of One Hundred Eighteen and Ninety-Eight Hundredths (118.98') feet to a point thence turns and runs North 27 23' 15" East for a distance of One Hundred Seventy-Eight and Seventy-Two Hundredths (178.72') feet to an old iron; thence turns runs North 75 38' 39" East for a distance of Twenty and One Hundredth (20.01') feet to an old iron; thence turns and runs North 75 26' 30" East along property now or formerly of R. Kenneth Roof for a distance of One Thousand Two Hundred Forty-Nine and Twenty-Four Hundredths (1,249.24') feet to an old iron in the centerline of a creek; thence turning and running South 18 02' 57" East for a distance of Nine Hundred Forty-Seven and Ninety-Three Hundredths (947.93') feet along property now or formerly of James H. Frick and Cecil Q. Frick to a concrete monument; thence turning and running South 84 41' 08" West for a total distance of Six Hundred Eighty-One and Forty Hundredths (681.40') feet to a concrete monument; thence turns and runs south 38 52' 11" West for a distance of One Thousand Seven and Ninety-Eight Hundredths (1,707.98') feet to an iron in the road bed of Old U.S. Highway 321; then turning and running South 40 40' 39" West for a distance of Eighty-Seven and Sixty-Eight Hundredths (87.68') feet; thence running North 10 47' 09" West for a distance of Three and Forty-Five Hundredths (3.45') feet to a broken concrete monument; thence turning and running North 62 56' 38" West along the right of way U.S. Highway 321 for a distance of One Hundred Fifty-One and 6 03' 43" West for a distance of Fifty-Four and Fifty Three Hundredths (54.53') feet to an old iron; thence turning and running North 68 01' 13" West for a distance of Thirty-Five and Forty-Seven Hundredths (35.47') feet to the point of beginning; all measurements being a little more or less.

TOGETHER WITH the Easement and right-of-way heretofore granted by Lenore Ruth Byrd, Ruth Evelyn Starnes and John E. Byrd as recorded in the Office of the R.M.C for Richland County, on April 30, 1976, in Book "D-382" , at page 922.

This being the same property conveyed to Richard Roberts by deed filed in Dead Book "D-383", at page 610, and by which his wife may claim some interest by virtue of an Order filed in Judgment Roll 151611 in the Office of the R.M.C for Richland County.

The Address of the Grantee: Route #1, Chester Road
Blythewood, South Carolina 29016

A handwritten signature in black ink, appearing to read "Rhonda Meisner", written over a horizontal line.

Rhonda Meisner, Plaintiff
PO Box 689
Blythewood, SC 29016
scorequipment@gmail.com

November 22, 2023

Exhibit F

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 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 detertmined,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS

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

MOTION FOR DISSOLUTION OF LIS PENDENS, AND SANCTIONS

YOU WILL PLEASE TAKE NOTICE THAT the defendant Grant Meisner through his attorney, James Edward Bradley, hereby moves for an Order of this Court dissolving the *lis pendens* filed in this matter, and sanctioning the plaintiff in the amount of \$10,000 for abuse of the judicial process. The plaintiff Rhonda Meisner is involved in a divorce action with Grant Meisner. The two parties were married and are now in the process of a divorce.

Ancillary to the divorce filing, the plaintiff Rhonda Meisner brought this *pro se* action against Grant Meisner and other parties alleging a host of claims against Grant Meisner including conspiracy and other allegations.

By Order of the Honorable Jean Toal sitting by designation, all claims brought by Rhonda Meisner were dismissed. A copy of this Order is attached as "Exhibit A" to this motion.

As a result, Grant Meisner was dismissed as a defendant in this lawsuit.

Rhonda Meisner appealed this dismissal to the Court of Appeals. The Court of Appeals dismissed the appeal on the basis that it was not timely filed. The plaintiff Rhonda Meisner has not moved to reconsider that order or filed for certiorari to the South Carolina Supreme Court. As a result, the decision of the Court of Appeals is final, and Grant Meisner has been finally dismissed from this lawsuit.

In disregard of retired Justice Toal's Order, and the Court of Appeals' Order, Ms. Meisner has now filed five frivolous *lis pendens* against Grant Meisner's property in this lawsuit to which Grant Meisner is no longer a party. As a result, the *lis pendens* should be dissolved as there is no supporting lawsuit of the *lis pendens*. In addition, the lawsuit does not allege at all a controversy regarding ownership of property. As a result, a *lis pendens* would not be appropriate even if Grant Meisner was a defendant in this lawsuit.

The plaintiff's *pro se* filing of *lis pendens* against Grant Meisner who has already been dismissed from this lawsuit is an abuse of the judicial process. The plaintiff should be sanctioned by this Court for abusing the process in an amount to dissuade her from doing so in the future. Counsel for Grant Meisner believes a sanction of \$10,000 would be an appropriate sanction in this matter for frivolously filing five *lis pendens* in a lawsuit that does not allege claims to property and does not include as a defendant the person against whom the *lis pendens* are filed.

[Signature block to follow]

Respectfully submitted,

s/James Edward Bradley

James Edward Bradley, SC Bar #66130

Moore Bradley Myers Law Firm, P.A.

1700 Sunset Blvd. (29169)

P.O. Box 5709

West Columbia, SC 29171

(803)796-9160

Ward@mbmlawsc.com

Attorney for Defendant Grant Meisner

West Columbia, South Carolina
December 6, 2023

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

JUDGMENT IN A CIVIL CASE

Exhibit A

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

Exhibit G

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF RICHLAND)	
)	
Rhonda Meisner,)	C/A No. 2022-CP-40-01415
)	
Plaintiff,)	
)	
vs.)	ORDER FOR DISSOLUTION OF
)	<i>LIS PENDENS</i>
)	
Tricia L. Flowers; Flowers Consulting,)	
LLC; Flowers Consulting, LLC; John Doe,)	
(1-10) a fictional Name assigned to identify)	
parties that are not yet known or not yet)	
determined,)	
)	
Defendants.)	

INTRODUCTION

This matter came before the Court by video link at 2:00 PM, Thursday, August 8, 2024. James Edward Bradley appeared on behalf of Grant Meisner. The *Pro Se* litigant Rhonda Meisner appeared on her own behalf. Grant Meisner moved to dissolve five (5) *Lis Pendens* which had been filed against him by Rhonda Meisner. Grant Meisner also moved for sanctions on the basis that the *Lis Pendens* are frivolous. After hearing the arguments and reviewing the documents on file in this matter, the Court grants the motion to dissolve all five (5) *Lis Pendens*. The Court finds there is no basis for the *Lis Pendens*. However, the Court denies the motion for sanctions at this time.

DISCUSSION

This matter originates from a divorce between Rhonda Meisner and Grant Meisner which is still pending. Ancillary to that divorce, Ms. Meisner brought this *Pro Se* action in Circuit Court. Along with numerous other Defendants, she sued her husband, Grant Meisner, her husband’s company Grant Meisner, MD, LLC, her husband’s lawyer, Sheila Robinson, and

her husband's law firm named in the pleadings as Moore, Taylor & Thomas, PA, Moore Taylor Law Firm, PA and Moore Bradley Myers Law Firm, PA. These Defendants moved to dismiss on April 12, 2022. The motions to dismiss were heard by The Honorable Jean H. Toal on December 2, 2022. Justice Toal granted the motions on all Defendants in a Form 4 Order issued December 15, 2022, and a following Form 4 filed December 20, 2022. Ms. Meisner appealed these orders. The Court of Appeals dismissed the appeals as untimely filed.

On November 27, 2023, Ms. Meisner filed five separate *Lis Pendens* against Grant Meisner encumbering property set forth in those descriptions including Tax Map Numbers 10100-02-12; 10100-02-46; 10100-02-47; 15208-01-36; and a fifth *Lis Pendens* which did not contain a tax map number. For ease of reference and convenience, those five *Lis Pendens* are attached to this order as follows: Exhibit A: 10100-02-12; Exhibit B: 10100-02-46; Exhibit C: 10100-02-47; Exhibit D: 15208-01-36; and Exhibit E: unnumbered property. These five *Lis Pendens* were filed November 27, 2023, even though the case had been dismissed against Grant Meisner at that time.

The Court finds there is no pending action against Grant Meisner. Therefore, there is no basis upon which to file the *Lis Pendens*. Furthermore, the original allegations in the complaint do not implicate the title to property; therefore, a *Lis Pendens* is an inappropriate filing in this matter.

IT IS THEREFORE ORDERED that the five (5) attached *Lis Pendens* are all dissolved and of no affect whatsoever. A copy of this order with the attached *Lis Pendens* may be filed in the Register of Deeds Office for purposes of clarifying title.

Although there was no basis for filing these *Lis Pendens*, the Court finds that sanctions are not appropriate at this time.

IT IS THEREFORE ORDERED that the five (5) attached *Lis Pendens* labeled as: Exhibit A: 10100-02-12; Exhibit B: 10100-02-46; Exhibit C: 10100-02-47; Exhibit D: 15208-01-36; and Exhibit E: unnumbered property, filed November 27, 2023, by Rhonda Meisner are hereby dissolved and of no affect whatsoever.

AND IT IS SO ORDERED.



Richland Common Pleas

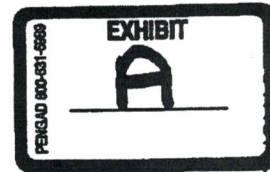
Case Caption: Rhonda Meisner vs Grant Meisner , defendant, et al
Case Number: 2022CP4001415
Type: Order/Dismissal and Cancellation of Lis Pendens

So Ordered

s/ Daniel Coble, 2774

Electronically signed on 2024-08-22 14:26:36 page 4 of 4

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STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIRCUIT COURT FIFTH
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

Rhonda Meisner

Plaintiff,

NOTICE OF FILING AND NOTICE OF

v.

LIS PENDENS

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.

+

JEANETTE W. McBRIDE
Clerk, S.C. & F.C.
2023 NOV 27 AM 11:25

RICHLAND COUNTY
FILED

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

WHEREAS, Ethel Eargle Monts f/k/a Ethel Eargle Abney acquired title to the below describe property by dead of Patrick Eargle dated January 24, 1929, reordered March 12, 1929 in Dead Book DF at page 194; and

WHEREAS, Ethel Abney Monts conveyed from the above property 5.0 acres to Delmar L. Roberts by deed recorded February 3, 1975 in Deed Book D-339 at page 304 and also 5,0 acres to Dalmar L. Roberts by deed recorded June 4 1980 in Deed Book D-542 at page 79; and

WHEREAS, Ethel Abney Monts died testsate on January 13, 1993 owning the below describe real property; and

WHEREAS, the last Will and Testament of Ethel Abney Monts directed that title to any real property owned by her at her death would vest in her Personal Representative who was vested with the authority to sell the real property; and WHEREAS, Carole H. Gunter was named as Personal Representative of the Last Will and Testament of Ethel Abney Monts and she has been appointed the personal Representative of the Estate of Ethel Abney Monts as will appear in estate file 93-Es- 32-00076, Office of the Probate Judge for Richland County; and

WHEREAS, The Estate of Ethel Abney Monts by Carole H. Gunter , as Personal Representative has agreed to sell the below describe real property to Grant R. Meisner.

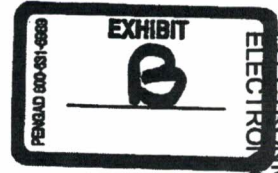
NOW, THEREFORE, KNOW ALL MEN BE THESE PRESENTS That Carole H. Gunter , as Personal Representative of the Estate of Ethel Abney Monts (hereinafter called "Grantor") in the state aforesaid , for and in consideration of the sum of NINETY-FOUR THOUSAND EIGHT HUNDRED THIRTY-FIVE AND 88/100 (\$94,835.88) Dollars to the Grantor in hand paid at and before the sealing of these presents by Grant R. Meisner (hereinafter called "Grantee") in the State aforesaid (the receipt of which is hereby acknowledge), has granted , bargained , sold , and released and by present does grant, bargain, sell, and release, unto the Grantee, his heirs successors ,and assigns:

All that certain piece, parcel or lot of land, with improvement thereon, lying, being and situate in the County of Richland, near Blythewood, State of South Carolina, containing 55.716 acres, more or less, and the same being shown on a plat prepared for Grant R. Meisner by Baxter Tax Map # 10100-02-12



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

November 22, 2023



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STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIRCUIT COURT FIFTH
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

Rhonda Meisner

Plaintiff,

NOTICE OF FILING AND NOTICE OF

v.

LIS PENDENS

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
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C.C.P. G.S. & E.C.

RICHLAND COUNTY
FILED

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

All that certain piece, parcel or lot of land, with improvement thereon, if any, situate lying and being in the County of Richland, State of South Carolina, being shown and delineated as Tract B on plat of Estate of Mayre Wall Eargle dated August 5, 1986 and recorded in Plat Book 51 at Page 5044 and being further shown and delineated as 38.486 acres on plat prepared for Grant R. Meisner by Bostick Surveying dated November 28, 1989 and recorded in Plat Book 53 at Page 250, RMC Office for Richland County, and having the following boundaries and

measurements according to said latter plat, to-wit: Beginning at iron at the intersection of the right-of-way of U.S. HWY, 321 and the South Western Corner of said property and running N28.56'05"E for a distance of 2162.91' to an iron; thence turning and running S13.00'46"W for a distance of 44.96', to an iron; thence turning and running S69.51'4E" for a distance of 497.94' to an iron; thence turning and running S22.31'24"W for an aggregate distance of 725.55', to a concrete monument; thence turning and running S13.00'46"W for a distance of 94.81', to an iron; thence turning and running N59.07'44"W for a distance of 178.97', to an iron; thence turning and running N59.43'32"W for a distance of 876.74' to an iron; and the point of commitment.

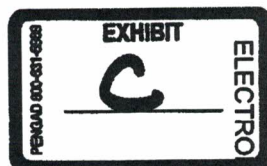
This being a portion of the identical property devised to Dolan Hoye Eargle, Jr and Stephen Taber Eargle under the Last Will and Testament of Mayre Wall Eargle and an exemplified copy of said Last Will and Testament being filed in the Office of the probate Court of Richland County as file 90-ES-40-0004 and being further described in a Deed from Dolan Hoye Eargle, Jr. as Executor and Stephen Taber Eargle as Executor to Dolan H. Eargle, Jr dated February 19, 1987 and recorded February 26, 1987 in Deed Book D-831 at Page 804 and being further described in a Corrective Deed from Stephen Taber Eargle to Dolan Hoye Eargle Jr. dated April 6, 1990 and recorded April 19, 1990 in Deed Book D-975 at Page 653 RMC Office for Richland County.

TMS NO: 10100-02-46



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

November 22, 2023



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STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIRCUIT COURT FIFTH
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

Rhonda Meisner

Plaintiff,

NOTICE OF FILING AND NOTICE OF

v.

LIS PENDENS

Grant Meisner; Grant Meisner, MD, LLC;
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RICHLAND COUNTY
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To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

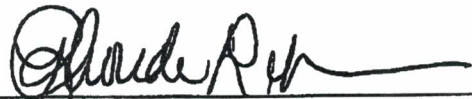
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ALL THAT CERTAIN piece, parcel or lot of land, with improvements thereon, if any, situate, lying and being in the County of Richland, State of South Carolina and being more fully shown and delineated as Tract A, Containing 38.409 acres on a plat prepared for the Estate of Mayre Wall Eargle by Bostick Surveying dated August 6, 1986 and recorded in plat book 51, page 5044.

This being the same property conveyed unto Stephen Taber Eargle by deed of the Estate of Mayre Wall Eargle dated February 19, 1987, and recorded in deed book 831, page 802 and corrective deed dated January 16, 1990 recorded in book D-976, page 652.

TMS:10100-02-47

November 22, 2023



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

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STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIRCUIT COURT FIFTH
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

Rhonda Meisner

Plaintiff,

NOTICE OF FILING AND NOTICE OF

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LIS PENDENS

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2023 NOV 27 AM 11:25
JEANETTE W. MCBRIDE
C.C.R. (S.S.) & FC
RICHLAND COUNTY
FILED

2023 NOV 27 9:13 PM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415
ELECTRONICALLY FILED - 2024 Aug 22 3:33 PM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

All that certain piece, parcel or lot of land, together with improvements thereon situate, lying and being near the City of Columbia, in the County of Richland, State of South Carolina, being shown and delineated as Lot 148, on Bonded Subdivision Plat of Blythe Creek by United Design Services, Inc, dated July 18, 2007, and recorded in the Office and the Register of Deeds for Richland County in Record Book 1352 at Pages 1403 and 1404. Being further shown on plat made for Ashton E. Williams by Ben Whetstone Associates, dated January 24, 2015, and recorded in Record Book 2009 at Page 1765; having the boundaries and measurements as shown on said plat, reference being craved thereto for a more complete and accurate legal description.

This being the same property conveyed to the within named Grantor by deed of Eric T. Simpson, dated February 27, 2015, and recorded in Record Books 2009 at Page 1768.

TMS NO:15208-01-36



Rhonda Meisner, Plaintiff
PO Box 689
Blythewood, SC 29016
scorequipment@gmail.com

November 22, 2023

ELECTRONICALLY FILED - 2024 Aug 21 9:13 PM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415
ELECTRONICALLY FILED - 2024 Aug 22 3:33 PM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415



STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE CIRCUIT COURT FIFTH
JUDICIAL CIRCUIT

DOCKET NO.2022-CP-40-01415

Rhonda Meisner

Plaintiff,

NOTICE OF FILING AND NOTICE OF

v.

LIS PENDENS

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.

+

2023 NOV 27 AM 11:25
JEANETTE W. MCBRIDE
C.C.R. G.S. & F.C.

RICHLAND COUNTY
FILED

To the Defendant, Grant Meisner, his attorney of record, Ward Bradley, the Plaintiff hereby notices the filing of a *lis pendens* in the above entitled case.

NOTICE IS HEREBY GIVEN that a motion to amend the amended complaint, in the above entitled action, will be filed within twenty days. This notice is to inform you of a *lis pendens* being filed and attached to the following property for the purposes of further protection and preservation of property rights the plaintiff claims in the property. The affected property is noted by the following legal description and conveyance as:

All those certain piece, parcels or tracts of land, containing in the aggregate 48.71 acres of land, with the improvements thereon, situate, lying and being North of the U.S. Highway 321, in the Country of Richland, State of South Carolina, and being shown and delineated as PARCEL "A" containing 42.87 acres, PARCEL "B" containing 5.57 acres, and PARCEL "C" containing 0.27 acre, on a plat prepared for Grant R. Meisner, by James F. Polson, Registered Land Surveyor, dated April 28, 1988, to be filed in the Office of the R.M.C for Richland County. According to said plat, Parcel "A" has the following metes and bounds: Beginning at an old iron pin in the road bed of Old U.S Highway 321 and runs North 0 13' 34' West for a distance of Two Hundred Seventy and Twenty-Seven Hundredths (270.27') feet to an iron; thence runs North 8 35' 30" East for a distance of Two Hundred Seventy and

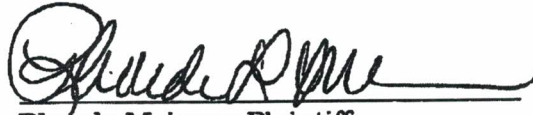
ELECTRONICALLY FILED - 2024 Aug 21 9:13 PM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415
ELECTRONICALLY FILED - 2024 Aug 22 3:33 PM - RICHLAND - COMMON PLEAS - CASE#2022CP4001415

Twenty-Seven Hundredths (270.27) feet to an iron; thence runs North 8 35' 30" East for a distance of Two Hundred Seventy-Two and Thirteen Hundredths (272.13') feet to an iron; thence turns and runs North 9 49' 41" East for distance of One Hundred Two and Thirty-Four Hundredths (102.34') feet to an old iron; thence turns and runs North 15 20' 09" East for a distance of Seven Hundred Fifty-Eight and Twenty Nine Hundredths (758.29') feet to an old iron; thence turns and runs North 21 21' 46" East for a distance of Two Hundred Eight-Six (286.00') feet to an old iron; thence turns and runs North 17 14' 21" East for a distance of One Hundred Eighteen and Ninety-Eight Hundredths (118.98') feet to a point thence turns and runs North 27 23' 15" East for a distance of One Hundred Seventy-Eight and Seventy-Two Hundredths (178.72') feet to an old iron; thence turns runs North 75 38' 39" East for a distance of Twenty and One Hundredth (20.01') feet to an old iron; thence turns and runs North 75 26' 30" East along property now or formerly of R. Kenneth Roof for a distance of One Thousand Two Hundred Forty-Nine and Twenty-Four Hundredths (1,249.24') feet to an old iron in the centerline of a creek; thence turning and running South 18 02' 57" East for a distance of Nine Hundred Forty-Seven and Ninety-Three Hundredths (947.93') feet along property now or formerly of James H. Frick and Cecil Q. Frick to a concrete monument; thence turning and running South 84 41' 08" West for a total distance of Six Hundred Eighty-One and Forty Hundredths (681.40') feet to a concrete monument; thence turns and runs south 38 52' 11" West for a distance of One Thousand Seven and Ninety-Eight Hundredths (1,707.98') feet to an iron in the road bed of Old U.S. Highway 321; then turning and running South 40 40' 39" West for a distance of Eighty-Seven and Sixty-Eight Hundredths (87.68') feet; thence running North 10 47' 09" West for a distance of Three and Forty-Five Hundredths (3.45') feet to a broken concrete monument; thence turning and running North 62 56' 38" West along the right of way U.S. Highway 321 for a distance of One Hundred Fifty-One and 6 03' 43" West for a distance of Fifty-Four and Fifty Three Hundredths (54.53') feet to an old iron; thence turning and running North 68 01' 13" West for a distance of Thirty-Five and Forty-Seven Hundredths (35.47') feet to the point of beginning; all measurements being a little more or less.

TOGETHER WITH the Easement and right-of-way heretofore granted by Lenore Ruth Byrd, Ruth Evelyn Starnes and John E. Byrd as recorded in the Office of the R.M.C for Richland County, on April 30, 1976, in Book "D-382", at page 922.

This being the same property conveyed to Richard Roberts by deed filed in Dead Book "D-383", at page 610, and by which his wife may claim some interest by virtue of an Order filed in Judgment Roll 151611 in the Office of the R.M.C for Richland County.

The Address of the Grantee: Route #1, Chester Road
Blythewood, South Carolina 29016



Rhonda Meisner, Plaintiff
PO Box 689
Blythewood, SC 29016
scorequipment@gmail.com

November 22, 2023

Exhibit H

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)

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:

The Plaintiff's Motion to Alter and/Amend which was filed on September 6,2024, is DENIED.

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 09/13/2024 .

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), SCRPC.



Richland Common Pleas

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

So Ordered

s/ Daniel Coble, 2774

Electronically signed on 2024-09-13 13:55:52 page 3 of 3