

STATE OF SOUTH CAROLINA COURT OF COMMON PLEAS
COUNTY OF DORCHESTER

FILED/RECORDED

2025 JUN 16 AM 11:17 CASE No : 2024-CP-1801459

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

ATTIA ELBADAWY & LYNNE CHATLOS
Pro se, Plaintiffs

MOTION TO STRIKE

v

Affidavits of Chris Hill and Kelsey Harper,
D.R. Horton Memorandum and Testimony
of Dorchester County Bradley Mitchell

D. R. Horton, Inc,
Defendants

Submitted by:

Attia Elbadawy and Lynne Chatlos, Plaintiffs Pro Se

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**MOTION TO STRIKE: AFFIDAVITS OF CHRIS HILL AND KELSEY HARPER,
D. R. HORTON MEMORANDUM, AND TESTIMONY of BRADLEY MITCHELL**

COMES NOW the Plaintiffs, Attia Elbadawy and Lynne Chatlos, pro se, and respectfully move this Court to strike from the record the following documents and testimony:

1. The Affidavit of Chris Hill
2. The Affidavit of Kelsey Harper
3. The Memorandum of Law submitted by D.R. Horton, Inc.
4. The testimony and any written statement of Dorchester County Attorney Bradley Mitchell

These materials contain false, misleading, and intentionally deceptive statements designed to mislead the Court regarding the legal and historical status of Wise Lane. The Plaintiffs have submitted counter evidence including sworn neighbor affidavits, title records, and plats proving that:

- The black metal gate and no-trespassing signage were in place since 2021, long before May 2024. before that there was a chain going across Wise Lane with no trespassing signs and orange traffic cones.

Wise Lane has not been used by the public for 20 continuous years.

No dedication of Wise Lane was accepted by Dorchester County or the public.

- D.R. Hortons property is not adjacent to Plaintiffs Lot 5, and their affidavits falsely state boundary claims.
- The language in Plaintiffs Deed AND Title search confirms an easement not a public roadway.

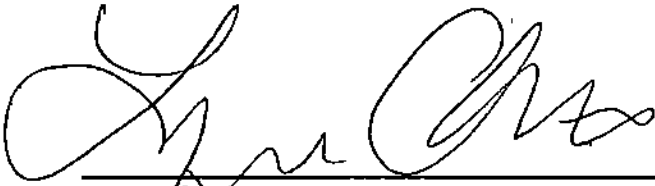
WHEREFORE, Plaintiffs respectfully request the Court:

1. Strike the above-mentioned affidavits and memorandum
2. Strike the misleading testimony of Bradley Mitchell.
3. Refer Attorney Mark Bible to the South Carolina Bar for ethics violations
4. Grant any further relief deemed just and proper

Respectfully submitted this 16th day of June 2025.



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