

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

2025 JUN 30 PH 12:07
IN THE COURT OF COMMON PLEAS
JUDICIAL CIRCUIT

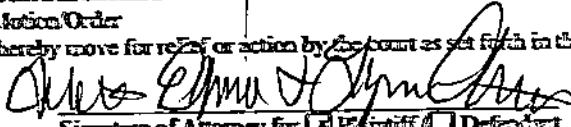
ATTIA ELBADAWY & LYNNE CHATLOS

CASE NO.: 2024 -CP- 18 - 01459
CLERK OF COURT
DORCHESTER COUNTY

vs.

D.R. HORTON, INC.

Defendant

Plaintiff's Attorney: PRO SE Bar No. _____ Address: 493 WISE ROAD, SUMMERVILLE, SC 29483 Phone: 843-641-8556 Fax _____ E-mail: ala_international@yahoo.com	Defendant's Attorney: KENISON, DUDLEY & CRAWFORD, PC Bar No. 101624 Address: 325 W. MCBEE AVE, SUITE #301, GREENVILLE, SC Phone: _____ Fax _____ E-mail: _____ Other: _____
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
MOTION TO STRIKE: SECTION I: Hearing Information Nature of Motion: <u>Dorchester County 3rd Party Defendants Answer to 3rd Party Plaintiff D.R. Horton Counterclaim</u> Estimated Time Needed: <u>20 MINUTES</u> Court Reporter Needed: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
SECTION II: Motion/Order Type <input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.  Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant Date submitted: <u>JUNE 30, 2025</u>	
SECTION III: Motion Fee <input checked="" type="checkbox"/> PAID - AMOUNT: \$ 25.00 <input type="checkbox"/> EXEMPT: (check reason) <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court, or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____, 20__
CLERK'S VERIFICATION Collected by: _____ Date Filed: _____, 20__	
<input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____	

SCCA 253 (11/2005)

SOUTH CAROLINA

LED-11

COURT OF COMMON PLEAS

COUNTY OF DORCHESTER

2025 JUN 30 PM 12:16

CASE No: 2024-CP-1801459

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Attia Elbadawy and Lynne Chatlos

Plaintiffs,

v

D.R. Horton, Inc.

Defendants,

D.R. Horton, Inc

Plaintiffs, Third Party

v:

Dorchester County

Defendants, Third Party

**CERTIFICATE OF SERVICE
MOTION TO STRIKE
THIRD PARTY DEFENDANTS
ANSWER TO THIRD PARTY
PLAINTIFFS , D.R. HORTON'S
COUNTERCLAIM**

We hereby certify that I have on this day of June 30, 2025,

We, the plaintiffs, have served a copy of the foregoing:

MOTION TO STRIKE: Third Party Defendants Answer to Third Party
Plaintiffs, D.R. Hortons Counterclaim

Upon the following party by placing a true and correct copy thereof in the
United States Mail, proper postage prepaid, addressed as follows:

Kenison, Dudley & Crawford, LLC
325 W McBee Ave, Suite #301
Greenville, SC 29601
D.R. Horton Attorney

Dorchester County Attorney
Bradley Mitchell
201 Johnson Street
St. George, SC 29477

Attia Elbadawy




493 Wise Road

Summerville, SC 29483

843-641-8556

alal_international@yahoo.com

Lynne Chatlos



493 Wise Road

Summerville, SC 29483

843-641-8556

alal_international@yahoo.com

SOUTH CAROLINA
DORCHESTER COUNTY

COURT OF COMMON PLEAS
CASE No: 2024-CP-1801459

Attia Elbadawy & Lynne Chatlos,
Plaintiffs,
V.
D.R. HORTON, INC.,
Defendant/Third-Party Plaintiff,

MOTION TO STRIKE
DORCHESTER COUNTY
THIRD PARTY DEFENDANT ANSWER
TO THIRD PARTY PLAINTIFF
D.R. HORTON'S COUNTERCLAIM

COMES NOW the Plaintiffs, Attia Elbadawy and Lynne Chatlos, and respectfully move this Court to Strike the Answer submitted by Third-Party Defendant Dorchester County to D.R. Horton's Third-Party Plaintiff Counterclaim, and to also Strike the testimony of County Attorney Bradley Mitchell from the court record. This motion is made on the following grounds:

1. On October 11, 2024, D.R. Horton filed a counterclaim against Plaintiffs and against Third-Party Defendant Dorchester County.
2. Plaintiffs timely answered the counterclaim on November 11, 2024. Dorchester County, however, failed to answer within the 30-day period required by South Carolina Rules of Civil Procedure. The County submitted an untimely Answer on June 17, 2025—more than eight months later and just one day before a virtual hearing scheduled on June 18, 2025.
3. The Answer submitted by Dorchester County was not sworn, not supported by affidavit, and included multiple false statements. No memorandum of law or supporting exhibits accompanied the submission.
4. It appears that the County's Answer was submitted strategically to support D.R. Horton's position in the hearing, and not in the interest of justice or proper legal procedure.
5. Bradley Mitchell, the attorney for Dorchester County, falsely stated during the January 21, 2025 virtual hearing that Wise Lane was a county road, despite offering no documents, no sworn

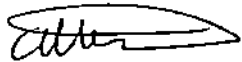
affidavit, and no evidentiary support. The County has also repeatedly refused to comply with Plaintiffs' FOIA requests, in violation of federal law.

WHEREFORE, Plaintiffs respectfully request that this Court strike Dorchester County's Answer to the Third-Party Plaintiff Counterclaim filed by D.R. Horton, as well as strike any statements or testimony made by County Attorney Bradley Mitchell that were not submitted under oath or supported by evidence.

Mr. Mitchell regarding the ownership or status of Wise Lane, not submitted under oath or supported by documentary evidence.

Bradley Mitchell
Dorchester County Attorney
201 Johnson Street
St. George, SC 29483

Mark Bible, Esq.
Attorney for D.R. Horton
325 W. McBee Avenue, Suite 301
Greenville, SC 29601



Attia Elbadawy, Pro Se
493 Wise Road
Summerville SC 29483

NOTARY VERIFICATION - MOTION TO STAY PENDING APPEAL

I, Attia Elbadawy, being duly sworn, depose and say that I am the Plaintiff in the foregoing Motion to Stay Pending Appeal for the Motion for Injunction; that I have read the Motion; and that the facts stated therein are true and correct to the best of my knowledge and belief.

Attia Elbadawy

Attia Elbadawy
493 Wise Road
Summerville, SC 29483

Subscribed and sworn to before me

JUN 30 2025
Lori R. Beier

This 30th day of June, 2025.

Notary Public for South Carolina

My Commission Expires:

