

IN THE SOUTH CAROLINA COURT OF APPEALS

CASE No: 2025-001299

ATTIA ELBADAWY and LYNNE CHATLOS,
Appellants,
V.
D.R. Horton, Inc
Respondents,

RECEIVED

SEP 22 2025

SC Court of Appeals

D.R. Horton, Inc,
Third Party Appellants,
V.
Dorchester County,
Third Party Respondents,

COMES NOW Plaintiffs, **Attia Elbadawy** and **Lynne Chatlos**, pro se, and on an emergency basis move this Court for immediate relief regarding Dorchester County Council's **September 2, 2025**, action purporting to reclassify **Wise Lane** as a county road while this matter is pending on appeal. Appellants respectfully state that the September 2 action is *ultra vires*, void, and taken in violation of constitutional and statutory protections (including S.C. Const. art. I, §§ 3, 8 & 13; S.C. Code §§ 30-4-70 & 57-9-10 et seq.; Rule 241, SCACR). Appellants seek immediate protection of the status quo and preservation of this Court's Jurisdiction.

IMMEDIATE RELIEF REQUESTED

- Ask the Court to Void and Sanction Dorchester County's Illegal Wrongfully Act
Stop Dorchester County from Acting during Litigation.
- Declare the **September 2, 2025**, vote null and void.
 - Set a prompt schedule for **sanctions** related to interference with appellate jurisdiction.
 - Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Attia Elbadawy



Lynne Chatlos



493 Wise Lane (911)
493 Wise Road (mailing)
Summerville, SC 29483
ala-international@yahoo.com
843-641-8556

BACKGROUND

On May 6, 2025, Judge Murphy denied the plaintiff's motion for temporary and preliminary injunction.

And on June 23, 2025, Judge Murphy denied the plaintiff's motion for reconsider temporary / preliminary injunction.

On July 3, 2025, the plaintiff's filed a Quiet Title Action lawsuit in Dorchester County Circuit Court to declare that Wise Lane is Private land.

And the easement between lot 5 and lot 6, which both lots are owned by the plaintiff, Attia Elbadawy, means both lots are under one ownership.

And according to the Doctrine of Merger, that an easement is ceased to exist.

Meaning the easement is relinquished and the easement is gone permanently forever.

The Doctrine of Merger is registered with Dorchester County Registered of Deeds and is part of the permanent record.

And the rest of the easement from lot 5 to the public right away on Weir Street.

It was taken by adverse possession through tacking and by the color of the deed.

See exhibit quiet title action.

On July 18, 2025, the Plaintiffs /Appellants filed the motion to stay, with the Court of Appeals

The respondent, D.H. Horton, never replied.

So, on July 30, 2025, the Court of Appeals imposed a temporary injunction and ordered the respondent, D.H. Horton, to file a return within 10 days

After the respondent, D.H. Horton, filed a return on 8-12-2025, the Plaintiffs/Appellants answered the respondent, D.H. Horton, on 8-13-2025.

After careful consideration, the Court of Appeals continued the temporary injunction and gave the circuit court a chance to review the petition for the writ of Supersedeas.

Returned and replied and determined whether the exhibits provided in those filings were part of the record before the court at its January 21, 2025, virtual hearing.

Appellants shall provide the court with a copy of the circuit court's written order making this determination within 10 days of the receipt.

Following the circuit court's written order making ruling, this court will consider the petition for Writ of Supersede..

But, still until today, the circuit court never sent the Plaintiff's/Appellant any decision or written order so the Plaintiffs/Appellant could answer and send it back to the Court of Appeals.

Instead, the circuit court scheduled hearings on the Writ of Supersede and the virtual hearing on 14 different motions, some of them that have been completed and some of them have no decision made by Judge Murphy in the past.

And the circuit court does not have any jurisdiction to hear those motions while the appellate court appeal is pending

The circuit court scheduled the hearing for October 6, 2025.

land and also to gives the court an excuse and on the grounds to denial all the plaintiff motions, 14 of them that are scheduled on October 6, 2025, virtual hearing.

So now we know the result of October 6, 2025 virtual hearing, meaning the court will deny all the plaintiff's motions on 10-6-2025 and give D.H. Horton and Dorchester County a good chance to escape the lawsuit and get away with all the violations they committed and also give a good chance to the court to get away from the violations committed on the hearing and undermining the South Carolina Court of Appeals work that they have been doing on the case.

By Dorchester County's actions and quick meeting to accept the plaintiff's driveway illegally into the as a county road while the case is still in the courts and during litigation is a big cover-up and is a serious violation to the federal laws and state laws of South Carolina.

How they acted proves just how desperate Dorchester County is to cover up themselves and D.H. Horton and the court and that is another proof how much the county is involved in corruption and violations of the state law and federal laws they are breaking and they are in a hurry and to quickly to set up or schedule a virtual hearing on October 6, 2025 so they can deny all the motions and they could also deny the Writ of Supersede

By Dorchester County Unlawful Act to accept the Plaintiffs/Appellants private driveway into the County Road system will cause huge Irreversible Harm and Prejudice to the Plaintiffs/Appellants and will affect the ongoing Litigation.

So, Dorchester County wants to cover up quickly their long list of violations, but in order to do that act, they must commit bigger violations by breaking Federal and State Laws and Property Rights and Civil Rights. The Plaintiffs/Appellants ask the Court to Void and Sanction Dorchester County to stop the abuse.

III. VIOLATIONS

- 1) Obstruction of Justice – S.C. Code § 16-9-10
- 2) Obtaining Property by False Pretenses – S.C. Code § 16-13-240
- 3) Abuse of Office / Civil Rights Violations under Color of Law – 42 U.S.C. § 1983
- 4) Violation of Cease-and-Desist Notice – Defiance of lawful directive
- 5) Judicial Misconduct – Continuing to act after appellate jurisdiction, contrary to Ex parte Knox (328 S.C. 77, 1997)
- 6) Identity Theft– S.C. Code Ann. 16-13-510
- 7) Property Theft– S.C. Code Ann. 16-13-230
- 8) False Statment/Perjury S.C Code 16-9-10
Submitted Appellants 2 TMS# below to DHEC
TMS # 142-04-00-018 & TMS # 142-04-00-019
to obtain a fake permit for D R Horton. Currently
under Investigation with DHEC.
- 9) Forgery S.C. Code 16-13-10
Submitted Fake map to S.C. DOT, claiming Wise Lane
is now a County Road. Currently under Investigation
with S.C Dot.
- 10) Conspiracy S.C Code 16-17-410, When two or more people agree
to submit fake information that is criminal conspiracy.
- 11) Office Misconduct/Malfeasance (common law) & S.C. Code 8-1-80
If any public official knowingly participates (signed, approved, allowing
false documents that's misconduct in office.
- 12) Recording Act Violations 30-5
Submitting a false plat/map violates the Recording Act.
- 13) Civil Rights Violations:
 1. Violation of Due Process (14th Amendment, 42 U.S.C. 1983)
 2. Violation of Takings Clause (5th & 14th Amendments)
 3. Equal Protection Violations (14th Amendment)
 4. Conspiracy to Interfere with Civil Rights (42 U.S.C. 1985)
 5. Denial of Right to Petition/Access Courts (1st Amendment, 42 U.S.C. 1983)

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Third Party, Appellants,
V.
Dorchester County
Third Party Respondents,

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SEP 22 2025

SC Court of Appeals

CERTIFICATE OF SERVICE
EMERGENCY MOTION FOR SANCTIONS
AND TO VOID SEPTEMBER 2, 2025,
DORCHESTER COUNTY COUNCIL ACTION

We, Attia Elbadawy and Lynne Chatlos, hereby certify that I have served a true and correct copy of the following document.

EMERGENCY MOTION FOR SANCTIONS AND TO VOID SEPTEMBER 2, 2025,
DORCHESTER COUNTY COUNCIL ACTION

on the following parties by placing the same in the United States Mail, postage prepaid, or by email,
on this 22, day of September 2025:

1) D.R. Horton, Inc
Kenison, Dudley & Crawford, LLC
325 W. McBee Avenue, Suite#301
Greenville, SC 29601

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

Respectfully submitted,
Attia Elbadawy,

Lynne Chatlos,
493 Wise Lane (911)
493 Wise Road (mailing)
Summerville, SC 29483
ala_international@yahoo.com
843-641-8556
September 22, 2025

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September 20, 2025, 8:08 am

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September 20, 2025, 8:06 am

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September 19, 2025, 11:13 am

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325 W. McBee Ave, Suite 301
Greenville, SC 29601

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SC Court of Appeals

MEMORANDUM OF LAW
In Support of Quiet Title – Wise Lane

I. Doctrine of Merger – Controlling Law

The Doctrine of Merger governs this case and ends it. Under South Carolina law, when one person owns both the dominant estate (the property that benefits) and the servient estate (the property burdened), the easement is automatically extinguished. No person can hold an easement over their own land. Once extinguished, the easement cannot be revived except by a new written grant.

- Haselden v. Schein, 167 S.C. 534, 166 S.E. 634 (1932).
- Blue Ridge Realty Co. v. Williamson, 247 S.C. 112, 145 S.E.2d 922 (1965).
- Windham v. Riddle, 381 S.C. 192, 672 S.E.2d 578 (Ct. App. 2006), aff'd 384 S.C. 428 (2009).

Plaintiff owns both Lots 5 and 6. By unity of title, any easement claims over Wise Lane were extinguished by operation of law. Wise Lane is exclusively private and under Plaintiff's control.

II. Statutory Framework

- S.C. Code § 6-29-1170 – Plat approval does not constitute public acceptance of any street.
- S.C. Code § 56-5-450 – Defines a private road as one used by the owner and invitees, not by the public.
- S.C. Code § 57-9-10 et seq. – Provides that abandonment or closure of a public road

requires a court order. No such order exists for Wise Lane.

III. Dedication & Acceptance Doctrine

South Carolina law requires both an offer to dedicate and an acceptance by the government before a road becomes public. Where either is missing, no public right-of-way exists. See *Youngblood v. County of Charleston*, 373 S.C. 123, 644 S.E.2d 36 (2007). Neither element exists here.

IV. Prescriptive Easements & Abandonment

Defendants cannot claim prescriptive rights. South Carolina requires 20 years of adverse use, not permissive use. Use subject to gates, chains, and permission is not adverse. See *Simmons v. Berkeley Electric Cooperative*.

Furthermore, prior neighbors abandoned any claims through non-use and transfer of property. Abandonment extinguishes any private easement.

V. Application to Wise Lane

Plaintiff owns both Lots 5 and 6, uniting dominant and servient parcels. Easements were extinguished by merger. No county ordinance or court order accepted Wise Lane into the public system. Gates, signage, and private maintenance confirm its private nature.

VI. Conclusion

Wise Lane – Doctrine of Merger Law Sheet

This Law Sheet explains why all easement claims over Wise Lane have been extinguished by the **Doctrine of Merger**. Under South Carolina law, no person can hold an easement over their own property. When the dominant and servient estates are brought into the same ownership, the easement is automatically and permanently extinguished. Once extinguished, it cannot be revived except by a new written grant. Wise Lane is therefore a private driveway under the sole control of the Plaintiff.

South Carolina Case Law on Merger

- *Haselden v. Schein*, 167 S.C. 534, 166 S.E. 634 (1932) – Held that when one person owns both dominant and servient estates, the easement is merged and ceases to exist.
- *Blue Ridge Realty Co. v. Williamson*, 247 S.C. 112, 145 S.E.2d 922 (1965) – The Court reaffirmed that one cannot have an easement over one's own land.
- *Windham v. Riddle*, 381 S.C. 192, 672 S.E.2d 578 (Ct. App. 2006), *aff'd* 384 S.C. 428 (2009) – Confirmed that merger automatically extinguishes easements and they cannot be revived without a new deed.

Application to Wise Lane

- Plaintiff owns both Lots 5 and 6 – the parcels historically associated with Wise Lane.
- By unity of title, any historic easement rights were extinguished by law at the moment of merger.
- No new written grant exists in the Dorchester County records that would recreate an easement.

- Therefore, Plaintiff is the last and only dominant estate holder, and no third party or county entity has any surviving right over Wise Lane.

Legal Effect

- Once the Doctrine of Merger applies, the extinguishment of the easement is final.
- Neither Dorchester County nor D.R. Horton can lawfully claim Wise Lane as a public road or easement.
- By law, Wise Lane is a private driveway controlled exclusively by Plaintiff.

Conclusion: Under the Doctrine of Merger, Wise Lane is exclusively private. All historic easements have been extinguished by operation of law. No court, county, or developer has any authority to claim otherwise. The Plaintiff stands as the sole easement holder, and all claims by Dorchester County or D.R. Horton are without legal foundation.

EXHIBIT A

C. DAVID CHINNIS
CHAIRMAN

RITA MAY RANCK
VICE CHAIRWOMAN

JASON L. WARD
COUNTY ADMINISTRATOR

LONA R. CONRAD
CLERK TO COUNCIL



JAMES LEX BYARS, III

EDWARD IVY CROSBY, JR.

S. TODD FRIDDLE

WILLIAM R. HEARN, JR.

PETER SMITH JR.

COUNTY COUNCIL OF DORCHESTER COUNTY

500 N. MAIN STREET, SUITE 2
SUMMERVILLE, SOUTH CAROLINA 29483
(843) 832-0196 or (843) 563-0196

MINUTES

DORCHESTER COUNTY COUNCIL KENNETH F. WAGGONER SERVICES CENTER WILLIE R. DAVIS COUNCIL CHAMBERS, ST. GEORGE SEPTEMBER 02, 2025 6:00 P.M.

Pursuant to the Freedom of Information Act, a notice was posted on the bulletin board 24 hours before the meeting, and the following media outlets were notified:
The Eagle-Record, The Summerville Journal Scene, The Post and Courier,
WCBD Channel 2, WCIV Channel 4 and WCSC Channel 5.

PRESENT: Mr. David Chinnis, Chairman
Ms. Rita May Ranck, Vice Chairwoman
Mr. Jay Byars
Mr. Eddie Crosby
Mr. Todd Friddle
Mr. William R. Hearn, Jr.
Mr. Peter Smith, Jr.
Ms. Denise Christmas, Deputy Administrator/Chief Financial Officer
Mr. Adam Davis, Deputy Administrator of Operations
Mr. Mario Formisano, Deputy Administrator/Public Safety
Mr. Bryan Havir, Assistant Administrator/Community Services
Mr. John Frampton, County Attorney
Mr. Bradley Mitchell, Deputy County Attorney
Ms. Lona R. Conrad, Clerk to Council

ABSENT: Mr. Jason L. Ward, County Administrator

Chairman Chinnis called to order the meeting of Dorchester County Council. The invocation was given by Councilman Byars, followed by the Pledge of Allegiance.

CHAIRMAN'S TIME – MR. DAVID CHINNIS

REQUEST FOR APPROVAL OF USE OF EMINENT DOMAIN FOR CONNELLY HAYNES ROAD PROJECT FOR TMS#'S 058-00-00-175, 058-00-00-035 AND 058-00-00-034

15. On the motion of Councilman Hearn, seconded by Councilman Crosby, County Council voted unanimously to approve the use of eminent domain for Connelly Haynes Road Project for TMS#'s 058-00-00-175, 058-00-00-035 and 058-00-00-034.

EXECUTIVE SESSION

The County Attorney requested Council's consideration to enter Executive Session at 6:54 p.m. to discuss the following:

- Legal Advice
 - EOC Pending Litigation
 - Acceptance of Public Dedication of Wise Road, a/k/a Wise Lane into the County's Public Maintenance System

RECONVENE FROM EXECUTIVE SESSION

At approximately 7:36 p.m., Mr. Frampton reported County Council discussed the previously announced items, but no action was taken.

ACCEPTANCE INTO ITS ROAD MAINTENANCE SYSTEM THE DEDICATED FIFTY-FOOT RIGHT-OF-WAY OF WISE ROAD, ALSO KNOWN AS WISE LANE, BEGINNING AT ITS INTERSECTION WITH WEIR LANE AND RUNNING WESTERLY TO ITS TERMINUS AT TMS# 134-00-00-039

16. On the motion of Councilman Hearn, seconded by Councilman Crosby, County Council voted unanimously to approve acceptance into its road maintenance system the dedicated fifty-foot right-of-way of Wise Road, also known as Wise Lane, beginning at its intersection with Weir Lane and running westerly to its terminus at TMS# 134-00-00-039.

ADJOURNMENT

17. On the motion of Councilman Byars, seconded by Councilman Crosby, County Council voted unanimously in favor to adjourn at approximately 7:37 p.m.

Lona R. Conrad

Lona R. Conrad, Clerk to Council

Memorandum of Law & Hearing Outline in Support of Quiet Title Action

Case No. 2025-CP-18-0527

Hearing: September 15, 2025 (Virtual)

I. Quiet Title Standard

Statute: S.C. Code Ann. § 15-67-10 et seq. allows an action to quiet title where a Plaintiff in possession claims ownership and adverse claims exist. Case: *Smith v. Whetstone*, 209 S.C. 78, 39 S.E.2d 127 (1946). The South Carolina Supreme Court confirmed that the purpose of a quiet title action is to remove clouds on title and establish clear ownership. Holding: If a Plaintiff shows superior right, the court must grant quiet title relief. Plaintiff meets this standard: possession, ownership, and exclusive use of Wise Lane.

II. Defaults Control the Case

Rule: Rule 55, SCRCF – failure to answer constitutes default, which is treated as an admission of the allegations in the complaint. Case: *Wham v. Shearson Lehman Bros., Inc.*, 298 S.C. 462, 381 S.E.2d 499 (Ct. App. 1989). Holding: To set aside a default, a party must prove (1) good cause for failing to respond, (2) a meritorious defense, and (3) prompt action after learning of default. Application: Horton and Dorchester County did not respond timely, and they have not satisfied any of these requirements. Case: *Roche v. Young Bros., Inc.*, 318 S.C. 207, 456 S.E.2d 897 (1995). Holding: Once default is entered, the defendant may not contest liability or file motions on the merits. Horton and County are bound by default; they cannot move to dismiss.

4.5

III. Adverse Possession Confirms Ownership

Statute: S.C. Code Ann. § 15-67-210 – title by adverse possession vests after 10 years of actual, open, notorious, exclusive, continuous, and hostile possession. Case: Caldwell v. Ryan, 201 S.C. 313, 23 S.E.2d 746 (1943). Holding: Private use and improvement of land without county intervention satisfies adverse possession. Case: Jones v. Leaird, 233 S.C. 506, 105 S.E.2d 802 (1958). Holding: Evidence of fencing, gates, and exclusive use by the claimant supported adverse possession of the road in question. Plaintiff and predecessors (Ola Perry,) built, maintained, gated, and exclusively used Wise Lane for decades. County repeatedly refused responsibility, confirming private status.

IV. Dismissal Motions Filed by Defaulted Parties Are Barred

Rule: Default prevents defendants from filing motions that go to the merits of the case (Rule 55, SCRCF). Case: Roche v. Young Bros., Inc., 318 S.C. 207 (1995). Holding: After default, a defendant cannot move to dismiss or challenge the sufficiency of the complaint. Case: Howard v. Holiday Inns, Inc., 271 S.C. 238, 246 S.E.2d 880 (1978). Holding: Courts lack discretion to allow a defendant to proceed without satisfying the strict Rule 55 requirements. Any motion to dismiss by Horton or County is procedurally void.

Relief Requested

Plaintiff respectfully requests that this Court: 1. Enter judgment quieting title in Plaintiff's favor as to Wise Lane. 2. Declare Wise Lane private, not county/public. 3. Deny all untimely dismissal motions by defaulted parties. 4. Grant such further relief as the Court deems just and proper.

MEMORANDUM OF LAW

I. A Local Government Cannot Convert a Private Drive into a Public Road Without a Lawful Dedication and Acceptance.

South Carolina requires (1) an owner's intent to dedicate and (2) public acceptance. Both are fact questions and cannot be presumed from unilateral government action. See *Mack v. Edens*, 320 S.C. 236, 239, 464 S.E.2d 124, 126 (Ct. App. 1984); *McAllister v. Smiley*, 301 S.C. 387, 392, 392 S.E.2d 365, 368 (1990). Even when dedication exists, a municipality acquires specific rights by law and cannot dispense with due process for private property. See *City of Myrtle Beach v. Parker*, 258 S.C. 563, 566–67, 190 S.E.2d 499, 501 (1972).

II. Executive-Session “Decisions” Are Void Under FOIA; Public Bodies Cannot Take Formal Action in Closed Session.

FOIA permits executive session only for narrow purposes and forbids taking formal action therein. S.C. Code § 30-4-70(b); see S.C. Attorney General Op. (Oct. 9, 2023). South Carolina courts have invalidated actions tainted by FOIA violations. See *Lambries v. Saluda Cty. Council*, 409 S.C. 1, 6–9, 760 S.E.2d 785, 788–90 (2014) (discussing agenda/open-meeting requirements and remedies); *Antley v. Shepherd*, Op. No. 3173 (S.C. Ct. App.) (decision made in executive session is null and void under FOIA).

III. The September 2 Vote Significantly Interfered with the Judiciary—Contrary to Separation of Powers.

The separation-of-powers doctrine forbids one branch from significantly interfering with another's operations. S.C. Const. art. I, § 8; see recent S.C. Supreme Court guidance reiterating that actions that materially impede judicial functions violate separation of powers. By purporting to decide disputed property rights mid-appeal, the Council intruded on this Court's jurisdiction.

IV. The Council's Action Effects a Taking Without Due Process or Just Compensation.

Reclassifying a private driveway as “public” authorizes governmental occupation and use, amounting to a per se taking requiring lawful process and compensation. S.C. Const. art. I, § 13; U.S. Const. amend. XIV. Where the State needs use of land for public travel, condemnation—not executive-session fiat—is the lawful route. See, e.g., *SC State Highway Dep't v. Allison*, 246 S.C. 389, 144 S.E.2d 800 (1965).

V. Standards for Emergency Relief and Appellate Stays Support Immediate Injunctive Relief Here.

Rule 241, SCACR recognizes supersedeas stays to preserve the status quo pending appeal; its effect is to suspend matters decided in the appealed order and revive prior terms. See Rule 241, SCACR. Rule 62(d), SCRPC likewise authorizes stays pending appeal. South Carolina authority confirms an appellate judge may issue injunctions pending appeal where necessary to prevent irreparable harm and preserve the Court's jurisdiction. See, e.g., filings discussing the standard for writs of supersedeas (Apr. 19, 2021, S.C. Ct. App.).

VI. Remedy: Void Ab Initio and Sanctions.

Acts taken ultra vires, in violation of FOIA and in contempt of the Court's jurisdiction, are void ab initio and should be enjoined. This Court should (1) declare the September 2 vote null and void; (2) enjoin any enforcement or reliance; (3) sanction Respondents for interference with the appellate process; and (4) award such further relief as justice requires.

MEMORANDUM OF LAW

I. A Local Government Cannot Convert a Private Drive into a Public Road Without a Lawful Dedication and Acceptance.

South Carolina requires (1) an owner's intent to dedicate and (2) public acceptance. Both are fact questions and cannot be presumed from unilateral government action. See *Mack v. Edens*, 320 S.C. 236, 239, 464 S.E.2d 124, 126 (Ct. App. 1984); *McAllister v. Smiley*, 301 S.C. 387, 392, 392 S.E.2d 365, 368 (1990). Even when dedication exists, a municipality acquires specific rights by law and cannot dispense with due process for private property. See *City of Myrtle Beach v. Parker*, 258 S.C. 563, 566–67, 190 S.E.2d 499, 501 (1972).

II. Executive-Session “Decisions” Are Void Under FOIA; Public Bodies Cannot Take Formal Action in Closed Session.

FOIA permits executive session only for narrow purposes and forbids taking formal action therein. S.C. Code § 30-4-70(b); see S.C. Attorney General Op. (Oct. 9, 2023). South Carolina courts have invalidated actions tainted by FOIA violations. See *Lambries v. Saluda Cty. Council*, 409 S.C. 1, 6–9, 760 S.E.2d 785, 788–90 (2014) (discussing agenda/open-meeting requirements and remedies); *Antley v. Shepherd*, Op. No. 3173 (S.C. Ct. App.) (decision made in executive session is null and void under FOIA).

III. The September 2 Vote Significantly Interfered with the Judiciary—Contrary to Separation of Powers.

The separation-of-powers doctrine forbids one branch from significantly interfering with another's operations. S.C. Const. art. I, § 8; see recent S.C. Supreme Court guidance reiterating that actions that materially impede judicial functions violate separation of powers. By purporting to decide disputed property rights mid-appeal, the Council intruded on this Court's jurisdiction.

IV. The Council's Action Effects a Taking Without Due Process or Just Compensation.

Reclassifying a private driveway as “public” authorizes governmental occupation and use, amounting to a per se taking requiring lawful process and compensation. S.C. Const. art. I, § 13; U.S. Const. amend. XIV. Where the State needs use of land for public travel, condemnation—not executive-session fiat—is the lawful route. See, e.g., *SC State Highway Dep't v. Allison*, 246 S.C. 389, 144 S.E.2d 800 (1965).

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VI. Remedy: Void Ab Initio and Sanctions.

Acts taken ultra vires, in violation of FOIA and in contempt of the Court's jurisdiction, are void ab initio and should be enjoined. This Court should (1) declare the September 2 vote null and void; (2) enjoin any enforcement or reliance; (3) sanction Respondents for interference with the appellate process; and (4) award such further relief as justice requires.



**DORCHESTER COUNTY WATER AND SEWER
235 DEMING WAY
SUMMERVILLE, SC 29483**

Jason Coffman, P.E., Water and Sewer Principal Engineer
(843) 832-0093 * (843) 563-0093 * Fax (843) 832-0073 * (843) 563-0073

June 26, 2024
Revised May 29, 2025

Construction Permitting Section
Bureau of Water
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

RE: DV Timbers Subdivision (Permit WW045932)
O&M/Willingness to Serve Letter-Sanitary Sewer

To whom it may concern:

Dorchester County Water & Sewer Department will Own, Operate, and Maintain the above referenced project including the common lines of the double services after all testing, inspection, and other closeout procedures are successfully completed. Dorchester County Water and Sewer will accept and treat the flow. This project will consist of a gravity sewer main extension to serve a 73-lot subdivision. The main extension will also provide access to two off-site properties for a total of 75 residential lots. The off-site properties are indicated as TMS 142-04-00-018 and 142-04-00-019 on Sheet C4.6. The average daily flow for the 75 lots is estimated to be 18,750 GPD. The properties indicated as TMS 142-04-00-022 and 142-04-00-053 have service available by an existing gravity sewer main.

This letter is for a revision to a previously permitted project.

The project will connect to an existing and operational gravity main in the Twin Lakes Subdivision (Permit 31603-WW). Do not hesitate to call me at (843) 832-0093 if you have any questions or need additional information.

Sincerely,

 Digitally signed by
Jason D. Coffman
Date: 2025.05.29
13:07:40 -04'00'

Jason D. Coffman, P.E.
Water and Sewer Principal Engineer

cc: Larry Harper – DCWS
Steven Ricker – DCWS
Ann Marie Chadeayne – DCWS
Taylor Reeves – Stantec

APP#1



Dorchester
COUNTY

PLANNING & ZONING

KIERA REINERTSEN
Director

*** RESIDENTIAL USE ***

February 17, 2023

Attia Elbadawy
6880 Rivers Ave, Unit 2219
North Charleston, SC 29406

Dear Elbadawy:

Please accept this letter as verification of the address assigned to your property known as **Lot 5, Blk N in Twin Lakes** with access off **Wise Lane, Summerville, SC**.

**493 Wise Lane
Summerville, SC 29483
TMS# 142-04-00-019.000**

Address numbers are very important for location of your property in the event of an emergency; **therefore, we need you to properly post your address numbers where they can be seen in all types of weather.**

Dorchester County Ordinance 04-13 requires that numbers be in a color that contrasts with the background on which they are displayed. **The numbers must be at least 4 (four) inches in height for residential use.** The numbers are to be placed on residential structures within twenty (20) days of receiving this letter.

The street address must also be placed on your mailbox to receive mail. If you presently use a PO Box your street address is the physical location of your residence or business, and requires the numbers be placed on your home or business also. The owner / resident is responsible for the cost of displaying the address and for notifying agencies and individuals of this new address.

If you need further assistance, please contact the E 9-1-1 Addressing office at (843) 832-0029 or (843) 563-0029.

Sincerely,

Tiffany B. Heber
Tiffany B. Heber
Land Surveying Tech

****Recreational vehicles, travel trailers (campers) or motorized homes licensed for travel on highways shall not be construed as manufactured (or mobile) homes for the purpose of providing permanent occupancy for human habitation.***

DorchesterCountySC.gov

500 North Main Street • Box 3 • Summerville • South Carolina • 29483
St. George 843.563.0020 • Summerville 843.832.0020 • Fax 843.832.0037

20

Analysis of 1967 Deed Record (Book 153, Pages 71–72)

Document Information:

- Dorchester County Register of Deeds, Book 153, Pages 71–72.
- Signed June 23, 1967; Recorded June 24, 1967.
- Certified with official seal.

Parties:

- Grantor: Hazel M. Myers (widow and sole heir of Burwell R. Myers).
- Grantee: American Mortgage & Investment Company, Inc. (a private lender/investor).

Transaction Details:

- Consideration: \$129,710.00.
- Property: Large tract of land in the Village of Knightsville, Dorchester County, SC.
- Legal description references Plat by J.S. Tharpe, Surveyor, dated July 19, 1966, recorded in Plat Book P, Page 104.
- Full warranty deed: Grantor binds herself, heirs, and executors to defend the property title.
- Includes renunciation of dower, ensuring clear private ownership.

Key Observations:

- This was a private transfer to a mortgage company, not to Dorchester County.
- The deed contains no dedication of any road, including Wise (Mars) Lane, to public use.
- The reference to the 1966 plat indicates subdivision planning, but the land remained privately conveyed.
- Confirms that Wise/Mars Lane and adjoining property were part of private transactions during development.

Quiet Title Relevance:

1. Continuity of Private Ownership – Land tied to Wise/Mars Lane transferred privately in 1967.
2. No County Involvement – Grantee was a private investment company, not Dorchester County.
3. Plat Reference – Supports argument that Wise/Mars Lane was laid out for access in subdivision planning but not dedicated to public use.
4. Strong Evidence – Reinforces 150+ years of private conveyances with no record of county acceptance.

Conclusion:

This 1967 deed strengthens the chain of title evidence showing Wise/Mars Lane has always been part of private property. It documents a mid-20th century private transfer, with full warranty and plat reference, but no county acceptance. As part of the record, it is strong supporting evidence for proving Wise/Mars Lane is a private road in the Quiet Title action.

Anonymous Summary & Analysis of Deed Records

Certified Copy Information:

- Official certified copies from Dorchester County Register of Deeds.
- One deed certified in 2005; another recorded January 7, 1911.
- Both are legally valid chain-of-title records.

What the Deeds Show:

- Private transfers of land in Dorchester County; no county or public involvement.
- The 1910–1911 deed reflects a sale between private parties, recorded when Dorchester began formal deed books.
- Later deeds (2005 copy) trace ownership back to 1857.

Key Legal Features:

- Warranty clauses confirm permanent private ownership.
- Dower renunciation clears future ownership disputes.
- References to deeds as far back as 1857 establish root of title.

Historical Significance:

- 1911 date marks start of Dorchester's deed recording, not public ownership.
- 1857 reference confirms more than 150 years of private conveyances.
- No dedication or transfer to Dorchester County ever occurred.

Quiet Title Relevance:

1. Chain of private ownership from 1857 through present.
2. No record of public dedication or county acceptance.
3. Over a century of uninterrupted private use and control.

Conclusion:

These deeds confirm Wise Lane has always been private property, conveyed only through private transfers for over 150 years. There is no evidence of county acceptance or public dedication. These records are strong supporting evidence for the Quiet Title action.

EXHIBIT B

SOUTH CAROLINA COURT OF COMMON PLEAS
DORCHESTER COUNTY CASE # 2025-CP-180152

Affidavit of Attia Elbadawy for Quiet Title Action

My name is Attia Elbadawy. I live at 493 Wise Lane (493 Wise Road for 911 and mail purposes). In April 2018, I bought two lots, #5 and #6 in the N block of the Twin Lakes Subdivision in the town of Summerville, Dorchester County, South Carolina.

On the day of the closing, April 30, 2018, the previous owner, Olah Perry, shook my hand and said: "Congratulations on your new property. Now Wise Lane is yours to care for."

Since May 2018, my wife, my brother, and I started working on the property. The conditions of Wise Lane was very bad. I called Dorchester County many times to try to get them to fix the road and to provide sewer lines to Wise Lane. At first, the county could not find the property, so I gave them directions by phone. After searching by TMS numbers, the county confirmed to me that Wise Lane is a private easement, a private driveway serving only lots five and six. Both lots are mine. On the other side, Wise Road is also a private road, a private easement serving only three landowners. Dorchester County refused to build Wise Lane and told me that it was my responsibility to build/maintain the road as a private driveway. The county also confirmed that Dorchester County had abandoned any interest in Wise Lane, and that it had no rights or no responsibilities on Wise Lane.

I asked Dorchester County whether, if I spent the time and money to fix Wise Lane, could they later take it and make it a county road. They said no. The county explained that to accept Wise Lane, I would have to build it to county standards, then file a petition with county council. Only after a meeting could the county vote to accept the road. I was told such construction would cost at least \$250,000, and the county would not pay for it. Based on this, I began improving Wise Lane myself. I installed a chain and signs at both ends of Wise Lane stating, "No Trespassing," "Keep Out," and "Private Property." I cut trees, cleared brush, filled the road with gravel and concrete pipes which I broke into small pieces using a sledgehammer to fix the road, and used heavy equipment and semi-truck trailers to block Wise Lane from both ends. See exhibit photos.

I have been working on Wise Lane since day one, May 2018, not Dorchester County ever. So, I installed a chain across Wise Lane at the top of the road, where it meets with Weir Street. With orange traffic cones in front of the chain with no trespassing, keep out and private property signs hanging from the chain. As I was able to cut more trees, my neighbor Steve Meyer helped me move my semi-truck trailer to the other end of Wise Lane. My neighbors on Wise Road had confirmed to me that no public ever used Wise Lane or Wise Road, and told me how many times they tried to get the county to maintain the road for them but the county always refused them. The only person who ever used Wise Lane was Olah Perry, the previous owner she used to maintain a small path to get through to her property Lot #5 and #6 and from lot#5 to the dead-end, she maintained the whole area of Wise Lane, she used to cut grass/garden and had a picnic area at the end of Wise Lane.

When D. R Horton encroached on my property, D.R Horton took the picnic area which was built by Olah Perry. Since 1974, up until I started to maintain this area in May 2018 up until today, and I still use that picnic area. Since May 2018, I managed to block Wise Lane by a semi-truck trailer and heavy equipment machines and the chain across Wise Lane with no trespassing, keep out, and private property signs hanging from it. Building up Wise Lane, bringing in bricks, concrete pipes, using sledgehammers to break the concrete pipes into small pieces to fill in the road. No public ever used Wise Lane.

In March 2019, my brother and I were cutting some trees on Wise Lane. The tree shifted and fell on the power line, just touching the line, but that was enough to cause a blackout all over Summerville that day. The tree fell on my brother's leg. I tried to get him help by dragging him out from underneath the tree. I was doing that, helping him, my neighbor, Michael Stuber, and his son came out of their house with a semi-rifle and started shooting at us. My brother and I had no choice but to hide under the trees until they stopped. I found out later on those same neighbors are not good people and nobody in the neighborhood likes them and have had past horrible experiences with them. In the year 2020, my wife had to have major hernia surgery with hernia mesh put in her stomach due to pushing cars and trying to help build up Wise Lane. She still suffers from that surgery today from the aftereffects of Wise Lane. In or about January 2021, I installed a permanent black metal gate at the top of Wise Lane, replacing the chain with the help of my neighbor, Steve Myers, and replaced all the signs from that chain, moved them to the black metal permanent gate, the no trespassing, and keep out and private property signs.

In or about February 2023, I made a last attempt to get the county to let me tap into the sewer system at the manhole cover on Wise Road. I wanted to run a sewer pipe through Wise Lane to my lot# 5, but instead I was forced to build a very expensive above-ground septic system and also well for water. The county denied my application, telling me that the county does not have any sewer lines close to Wise Lane.

Although the county has an existing sewer system on Wise Road, there are none on Wise Lane. The only house that uses the county sewer system is my neighbor, Amanda Wise, who lives at 502 Wise Road. Her house is tapped directly into the sewer manhole cover on Wise Road. Wise Lane has no sewer system and never will, because I was already forced to build the expensive above-ground septic system and well for water. and there is no need for the county sewer system on Wise Lane.

On February 16, 2023, I was assigned my home address of 493 Wise Road. I wondered why it was not listed as Wise Lane. The very next day, on February 17, 2023, I called the Planning and Zoning Department in Dorchester County to ask why the county had changed my road from a lane to a road. They told me they had not changed it. They explained that my 911 address of 493 Wise Road is used only for emergency and mail purposes, because Wise Lane is a private driveway and private easement. They further told me that emergency vehicles, garbage trucks, and school buses are not allowed to travel on Wise Lane. (See Exhibit).

On July 26, 2024, homebuilder D.R. Horton trespassed on my private property, with an excavator machine Wise Lane, on my driveway, causing significant damage to the road and to the property. They harassed my wife, and my wife managed to throw five men off the property. This left her traumatized, and she is still dealing with the trauma of it today. The D.R. Horton worker, manager, Chris Hill, terrified and scared us.

Later, the plaintiff filed a lawsuit against Dorchester County and D.H. Horton in Dorchester County Circuit Court on September 5, 2024. D.R. Horton and Dorchester County claimed that Wise Lane and Wise Road are one, calling Wise Lane aka Wise Road.

When I fixed Wise Lane and spent tens of thousands of dollars and years doing it, the county informed me that Wise Lane is a private road and a private easement. So I was always under the impression that Wise Lane was my private driveway. Why would I have spent all that time and money if I didn't think that? Dorchester County told me that Wise Lane is Wise Lane. My title search confirms that Wise Lane is a private easement, and the previous owner, Olah Perry, she is the owner by adverse possession from a long time ago. And when Olah Perry bought two lots, lot 5 and lot 6, those two lots combined under one owner, she relinquished the easement on lot 5 and lot 6, meaning the easement ceased to exist. So, the easement on lot 5 and lot 6 became part of the private property automatically because according to the law of the easement, when the servant state and the dominant state merged together, the easement is relinquished, it's dissolved, means it does not exist anymore. The reason for the easement that had been established is gone now. And Wise Lane from lot number 5 to Weir Street is a driveway an easement to the dominant state which lot 5 and 6 are together.

So, by the county and D.H. Horton claiming that "Wise Lane, aka Wise Road".

So now I also have a color of title.

Conclusion:

The previous owner, Olah Perry, she is the only person who used Wise Lane from 1974 until she sold the property to me in April 2018. As the new owner, according to my neighbor's affidavits, she used to maintain a small path through Wise Lane to her property, lot number 5. She also maintained the whole road from lot number 5 to the dead end. She posted no trespassing, keep out, and private property signs all over Wise Lane and throughout the property. She used to cut grass and garden, and she even had a BBQ and picnic area at the dead end of Wise Lane, which I'm still using this area up until today.

She used Wise Lane openly, notoriously, exclusively, and actually continued from 1974 until April 2018. According to the neighbor's affidavits, she used to treat Wise Lane like her own property for over 40 years. Since I took over the ownership in April 2018, I also treated Wise Lane like my very own property. I developed the land, fixed the road, spent time and money and labor to fix the road. I blocked Wise Lane from both sides with semi-truck trailers and heavy equipment chains. First with a chain, then to the permanent black metal gate, always had signs posted, no trespassing, keep out, and private property signs since May 2018. I've been continuing the adverse possession through Olah Perry past.

I have used Wise Lane since May 2018, open, notoriously, hostile, actual, exclusive for over seven years, and built and maintained the road. The county has never done any type of work or maintained.

So Wise Lane is a private easement for Attia Elbadawy. The easement between Lot 5 and Lot 6 is relinquished, means it does not exist due to the fact that Lot 5 and Lot 6 are merged together under one owner, Attia Elbadawy, and the private easement from Lot 5 to Weir Street is a driveway.

Private easement has been taken by adverse possession by the previous owner, through Olah Perry, Attia Elbadawy has continued the adverse possession by tacking from the previous owner and also by the color of title.

No public has ever used Wise Lane since I've been the owner, and if any of the public has used Wise Lane, they are considered trespassing and should be arrested. No public ever used Wise Lane or Wise Road for over 40 years. Wise Lane and Wise Road are dead ends surrounded by a forest, woods, and when the lumber company cut the trees, they used Helms Drive off of Scotch Range Road to go to Central Avenue. They never used Wise Lane, never used Wise Road, and also when D.R. Horton cleaned and cut the trees on their subdivision, D.V. Timber, they always used Helms Drive off of Scotch Range Road to Central Avenue. They never used Wise Lane or Wise Road. D.R. Horton encroached on Attia Elbadawy property by over 25 feet, taking over the garden and picnic area that Olah Perry had built over 40 years ago, one time, D. R. Horton actually took a picture at the Black Metal Gate and removed one of the signs, the no trespassing signs: to take the picture so they could give it to the court and then put the sign back. They tried to fool the court, but the sign has always been there, and this is confirmed through emails, neighbor's and Clayton homes affidavits. See exhibit. Also, the gate has been there since January 2021, the Black Metal Permanent Gate, and before that there was a chain since 2018, and prior to that, Olah Perry had posted signs saying no trespassing, keep out, and private property since 1974.

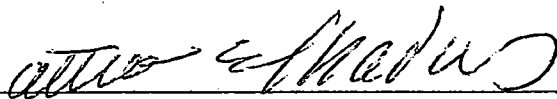
Attia Elbadawy
493 Wise Road
Summerville SC 29483
ala_international@yahoo.com
843-641-8556

Signature and Verification Page

Affidavit of Attia Elbadawy Quiet Title Action

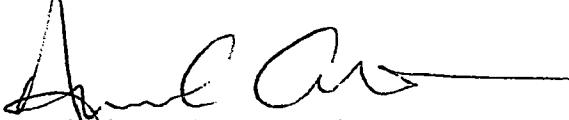
I, Attia Elbadawy, being duly sworn, affirm under oath that the facts set forth in this affidavit are true and correct to the best of my knowledge, information, and belief. I make this affidavit in support of my Quiet Title Action and in furtherance of my claim to exclusive rights, ownership, and possession of Wise Lane by merger, adverse possession, and color of title.

Executed this 11th day of September 2025, in Dorchester County, South Carolina.

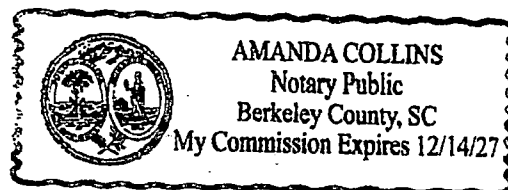
Attia Elbadawy 

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

Subscribed and sworn to before me by Attia Elbadawy, this 11th day of September, 2025


Notary Public for South Carolina

My Commission Expires: 12/14/27



SOUTH CAROLINA COURT OF COMMON PLEAS
DORCHESTER COUNTY CASE # 2025-CP-180152

Affidavit of Lynne Chatlos for Quiet Title Action

My name is Lynne Chatlos. I live at 493 Wise Lane (493 Wise Road for 911 and mail purposes).

In April 2018, my husband bought two lots, #5 and #6 in the N block of the Twin Lakes Subdivision in the town of Summerville, Dorchester County, South Carolina.

On the day of the closing, April 30, 2018, the previous owner, Olah Perry, shook his hand and said: "Congratulations on your new property. Now Wise Lane is yours to care for."

Since May 2018, my husband, my brother-in-law, and I started working on the property. The conditions of Wise Lane was terrible. We called Dorchester County many times to try to get them to fix the road and to provide sewer lines to Wise Lane. At first, the county could not find the property, so, we gave them directions by phone. After searching by TMS numbers, the county confirmed to me that Wise Lane is a private easement, a private driveway serving only lots #5 and #6. Both lots are my husband. On the other side, Wise Road is also a private road, a private easement serving only three landowners. Dorchester County refused to build Wise Lane and told us that it was my husband responsibility to build/maintain the road as a private driveway. The county also confirmed that Dorchester County had abandoned any interest in Wise Lane, and that it had no rights or no responsibilities on Wise Lane.

He asked Dorchester County whether, if he spent time and money to fix Wise Lane, could they later take it and make it a county road. They said no. The county explained that to accept Wise Lane, he would have to build it to county standards, then file a petition with county council. Only after a meeting could the county vote to accept the road. he was told such construction would cost at least \$250,000, county would not pay for it. Based on this, we began improving Wise Lane. He installed a chain and signs at both ends of Wise Lane stating, "No Trespassing," "Keep Out," and "Private Property." we cut trees, cleared brush, filled the road with gravel and concrete pipes which he broke into small pieces using a sledgehammer to fix the road, and used heavy equipment and semi-truck trailers to block Wise Lane from both ends. See exhibit photos.

We started working on Wise Lane right after the closing, May 2018, not Dorchester County never did. So, he installed a chain across Wise Lane at the top of the road, where it meets with Weir Street. With traffic cones in front of the chain with no trespassing, keep out and private property signs hanging from the chain. As he was able to cut more trees, the neighbor Steve Meyer helped him move a semi-truck trailer to the other end of Wise Lane. The neighbors on Wise Road had confirmed to us that no public ever used Wise Lane or Wise Road, and told us how many times they tried to get the county to maintain the road for them but the county always refused them. The only person who ever used Wise Lane was Olah Perry, the previous owner she used to maintain a small strip of land to get through to her property Lot #5 and #6 and from lot #5 to the dead-end, she maintained the whole area of Wise Lane, by cutting grass/some gardening and had a BBQ area at the end of Wise Lane.

When D. R Horton encroached on the property, D.R Horton took the BBQ area which was built by Olah Perry. Since 1974, up until we started to maintain this area in May 2018 up until today, and we still use that BBQ area. Since May 2018 Wise Lane has been blocked by a semi-truck trailer and heavy equipment machines and the chain across Wise Lane with no trespassing, keep out, and private property signs hanging from it. Building up Wise Lane, bringing in bricks, concrete pipes, using sledgehammers to break the concrete pipes into small pieces to fill in the road. No public ever used Wise Lane. In March 2019, my husband and brother-in-law were cutting some trees on Wise Lane. A tree shifted and fell on the power line, barely touching it but was enough to cause a blackout all over Summerville on that day. The tree fell on my brother in laws leg. My husband tried to help by dragging him out from underneath the tree. All of sudden they heard gun shots being fired by neighbor, Michael Stuber, and his son with a semi-rifle and started shooting at them. My husband and brother-in-law had to hide within the trees until they stopped. This was a horrible scene: in my neighborhood nobody likes them and have had past awful experiences with them. In the year 2020, I had to have major hernia surgery with hernia mesh put in my abdomen due to pushing cars and trying to help build up Wise Lane. I'm still suffering from that surgery today as a result of Wise Lane. In or about January 2021, my husband installed a permanent black metal gate at the top of Wise Lane, replacing the chain with the help of neighbor, Steve Meyers, and replaced all the signs from that chain, moved them to the black metal permanent gate, the no trespassing, and keep out and private property signs.

In or about February 2023, we made one last attempt to get the county to let us tap into the sewer system at the manhole cover on Wise Road. We wanted to run a sewer pipe through Wise Lane to lot# 5, but instead we were forced to build a very expensive above-ground septic system and also well for water. The county denied 3 applications, telling us that the county does not have any sewer lines close to Wise Lane over the years.

Although the county has an existing sewer system on Wise Road, there are none on Wise Lane. The only house that uses the county sewer system is neighbor, Amanda Wise, who lives at 502 Wise Road. Her house is tapped directly into the sewer manhole cover on Wise Road. Wise Lane has no sewer system and never will, because we were forced to build the very expensive above-ground septic system and well for water and had to spend 4 years in an apartment before Wise Lane was ready to place a home on the land and there is no need for the county sewer system on Wise Lane.

On February 16, 2023, I was assigned my home address of 493 Wise Road. We wondered why it was not listed as Wise Lane. So, on February 17, 2023, we called the Planning and Zoning Department in Dorchester County to ask why the county had changed my road from a lane to a road. They told me they had not changed a thing, they said that my 911 address of 493 Wise Road is used only for emergency and mail purposes, because Wise Lane is a private driveway and private easement. They further told me that emergency vehicles, garbage trucks, and school buses are not allowed to by on Wise Lane and then emailed us a "Residential Use Certificate" from the county. (See Exhibit).

On July 26, 2024, homebuilder D.R. Horton trespassed on Wise Lane, one of the most traumatic days of my life, seeing an excavator machine Wise Lane, on driveway, ripping up the trees/the road.

On that rainy Friday morning around 8am, five men were on the property. A woman alone in the woods with 5 aggressive men scared me so and I'm still dealing with the horrors of that day in my head, I will never forget what I was forced to endure, I got in my car for my own safety to protect myself from harm and with my husband on the phone, we told them to get the hell off the property or we will call 911, they left quickly after hearing that. Then D.R. Horton worker, manager, Chris Hill, keep intimidating us.

Later, we the plaintiffs filed a lawsuit against Dorchester County and D.R. Horton in Dorchester County Circuit Court on September 5, 2024. D.R. Horton and Dorchester County claimed that Wise Lane and Wise Road are one, calling "Wise Lane aka Wise Road" that is a lie.

When we fixed Wise Lane and spent tens of thousands of dollars and years doing it, the county informed us that Wise Lane is a private road and a private easement. So we were always under the impression that Wise Lane was a private driveway. Why would we have spent all that time and money if we didn't think that? Dorchester County told us that Wise Lane is Wise Lane. The title search confirms that Wise Lane is a private easement, and the previous owner, Olah Perry, she is the owner by adverse possession from a long time ago. And when Olah Perry bought two lots, lot 5 and lot 6, those two lots combined under one owner, she relinquished the easement on lot 5 and lot 6, meaning the easement ceased to exist. So, the easement on lot 5 and lot 6 became part of the private property automatically because according to the law of the easement, when the servant state and the dominant state merged together, the easement is relinquished, it's dissolved, means it does not exist anymore. The reason for the easement that had been established is gone now. And Wise Lane from lot number 5 to Weir Street is a driveway an easement to the dominant state which lot 5 and 6 are together. So, by the county and D.R. Horton claiming that "Wise Lane, aka Wise Road". Now my husband has a "Color of Title".

Conclusion:

The previous owner, Olah Perry, she is the only person who used Wise Lane from 1974 until she sold the property to my husband in April 2018. As the new owner, and according to my neighbor's affidavits, she used to maintain a small path through Wise Lane to her property, lot number 5. She also maintained the whole road from lot number 5 to the dead end. She posted no trespassing, keep out, and private property signs all over Wise Lane and throughout her property. She used to cut grass/garden, and she even had a BBQ at the dead end of Wise Lane, which we are still using this area up until today. She used Wise Lane openly, notoriously, exclusively, and actually continued from 1974 until April 2018. According to the neighbor's affidavits, she used to treat Wise Lane like her own property for over 40 years. Since we took over the April 2018, we have also treated Wise Lane as private property. We developed the land, fixed the road, spent time and money and labor to fix the road. My husband blocked Wise Lane from both sides with semi-truck trailers and heavy equipment chains. First with a chain, then to the permanent black metal gate, always had signs posted, no trespassing, keep out, and private property signs since May 2018. My husband been continuing the adverse possession with tacking through Olah Perry past years.

We have used Wise Lane since May 2018, open, notoriously, hostile, actual, exclusive for over seven years, and built and maintained the road. The county has never done any type of Maintenance, there are no work records or proof of the county ever did anything on Wise Lane.

So Wise Lane is a private easement for Attia Elbadawy alone, not share by anyone else but him. The easement between Lot 5 and Lot 6 is relinquished, means it does not exist, cause Lot 5 and Lot 6 are merged together under one owner, Attia Elbadawy, and the private easement from Lot 5 to Weir Street is a driveway. Private easement has been taken by adverse possession by the previous owner, through Olah Perry, Attia Elbadawy has continued the adverse possession by tacking from the previous owner and also by the color of title.

No public has ever used Wise Lane since he's been the owner, and if any of the public has used Wise Lane, they are considered trespassing and will be arrested. No public ever used Wise Lane or Wise Road for over 40 years. Wise Lane and Wise Road are dead ends surrounded by a forest, woods, and when the lumber company use to cut the trees, they used Helms Drive off of Scotch Range Road to go to Central Avenue. They never used Wise Lane, never used Wise Road, and also when D.R. Horton cleaned and cut the trees on their subdivision, D.V. Timber, they always used Helms Drive off of Scotch Range Road to Central Avenue. They never used Wise Lane or Wise Road and that what the real Encroachment Permit names Helms Drive not Wise Lane. D.R. Horton encroached on Attia Elbadawy property by over 25 feet, taking over the garden and BBQ area that Olah Perry had built over 40 years ago, one time, D. R. Horton thought they were being clever by removing the no trespassing sign on the Black Metal Gate and so they could take a photo then put the sign back and give it to the court to pretend there were no signs posted at all on the gate. They tried to fool the court, but the sign has always been there, and this is confirmed through emails, neighbor's and Clayton homes affidavits. See exhibit.

Also, the gate has been there since January 2021, the Black Metal Permanent Gate, and before that there was a chain since 2018, and prior to that, Olah Perry had posted several signs saying no trespassing, keep out, and private property since 1974.

Lynne Chatlos
493 Wise Road
Summerville SC 29483
ala_international@yahoo.com
843-412-8026

Signature and Verification Page

Affidavit of Lynne Chatlos, Quiet Title Action

I, Lynne Chatlos, being duly sworn, affirm under oath that the facts set forth in this affidavit are true and correct to the best of my knowledge, information, and belief. I make this affidavit in support of my husband Quiet Title Action and in furtherance of his claim to exclusive rights, ownership, and possession of Wise Lane by merger, adverse possession, and color of title.

Executed this 11 day of September 2025, in Dorchester County, South Carolina.

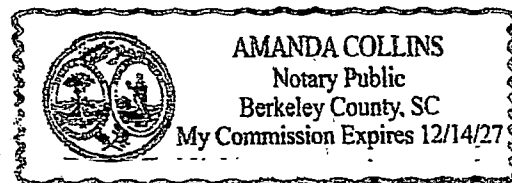
Lynne Chatlos

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

Subscribed and sworn to before me by Lynne Chatlos, this 11th day of September, 2025.

Notary Public for South Carolina

My Commission Expires: 12/14/27



STATE OF SOUTH CAROLINA FILED-AFFIDAVIT

COUNTY OF BERKELEY

2025 SEP 11 PM 1:51

2025 MAR 14 PM 1:38

Personally appeared before me, MARK WAPSHARE, who, having been duly sworn and on oath, deposed and said as follows:

WILE GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

CLERK OF COURT
DORCHESTER COUNTY

I am the manager of Clayton Homes Summerville, SC. I met with Attia Elbadawy in late November 2022 to discuss placing a double wide manufactured home on his 2 acre lot located on Wise Lane, Summerville, SC, which is part of Twin Lakes subdivision. We discussed starting construction in early 2023.

I visited the site several times during the set-up period of the project. The main issue was the above ground septic system. Our customer was attempting to get a permit from Dorchester County to tap into the county sewer system (the tap is at the top of Wise Lane). I advised if we go the route of tapping into the sewer system he could save a lot of money. Dorchester County repeatedly rejected his application with no real reason for the rejections. Even when we attempted to assist him, it was still rejected. This led to our customer having to install an above ground septic system which made him spend a lot of money and waste a lot of time.

Due to the conditions of the land and Wise Lane being a dirt road, my guys had to park at the black metal gate that displayed a NO TRESPASSING sign on it. I was afraid the truck would get stuck in the mud. I advised our customer that in order for my guys to bring the double wide home down Wise Lane we might need to remove the black metal gate. He had no problem with our request. (Wise Lane is a dirt dead-end road with a lot of heavy equipment and semi-trucks parked at the end of the dead-end.)

Wise Lane is a dirt driveway where our customer and his family cleared trees on to get to his 2 lots. This was never a Dorchester County maintained road and never had any public use upon it. There is also no close neighbors around the 2 lots. I did ask our customer to move the white storage container trailer parked on the dead-end part of Wise Lane. He moved it as requested so that my guys could maneuver the new double wide home.

Next was the search for an above ground septic system installer. Nick O'Brien is a specialist who worked with the engineering planners to design the above ground system. Nick also suggested that we tap in the county sewer system at the top of Wise Lane. Again, the application was rejected with no real cause given.

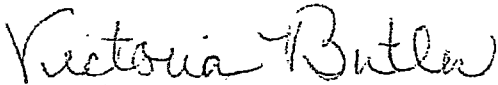
Our customer told me a couple of times about how he, his wife, and brother had worked extremely hard from scratch to build up the road (Wise Lane) and make it useable.

We then had to get the 911 address for our customer before he could move into his home. We also had to have a Dorchester County do their final inspection on the home before our customer could move is with his family. His address is now 493 Wise Lane. He was able to move in June 2023.


MARK WAPSHARE

SWORN to and subscribed before me

This 13 day of March, 2025.



Notary Public for South Carolina

My Commission Expires: March 12, 2031

Analysis of 1967 Deed Record (Book 153, Pages 71–72)

Document Information:

- Dorchester County Register of Deeds, Book 153, Pages 71–72.
- Signed June 23, 1967; Recorded June 24, 1967.
- Certified with official seal.

Parties:

- Grantor: Hazel M. Myers (widow and sole heir of Burwell R. Myers).
- Grantee: American Mortgage & Investment Company, Inc. (a private lender/investor).

Transaction Details:

- Consideration: \$129,710.00.
- Property: Large tract of land in the Village of Knightsville, Dorchester County, SC.
- Legal description references Plat by J.S. Tharpe, Surveyor, dated July 19, 1966, recorded in Plat Book P, Page 104.
- Full warranty deed: Grantor binds herself, heirs, and executors to defend the property title.
- Includes renunciation of dower, ensuring clear private ownership.

Key Observations:

- This was a private transfer to a mortgage company, not to Dorchester County.
- The deed contains no dedication of any road, including Wise (Mars) Lane, to public use.
- The reference to the 1966 plat indicates subdivision planning, but the land remained privately conveyed.
- Confirms that Wise/Mars Lane and adjoining property were part of private transactions during development.

Quiet Title Relevance:

1. Continuity of Private Ownership – Land tied to Wise/Mars Lane transferred privately in 1967.
2. No County Involvement – Grantee was a private investment company, not Dorchester County.
3. Plat Reference – Supports argument that Wise/Mars Lane was laid out for access in subdivision planning but not dedicated to public use.
4. Strong Evidence – Reinforces 150+ years of private conveyances with no record of county acceptance.

Conclusion:

This 1967 deed strengthens the chain of title evidence showing Wise/Mars Lane has always been part of private property. It documents a mid-20th century private transfer, with full warranty and plat reference, but no county acceptance. As part of the record, it is strong supporting evidence for proving Wise/Mars Lane is a private road in the Quiet Title action.

163-71

Form 14-Title to Real Estate

Revised 1925

\$250.00 S.C. Doc. Stamps, and \$137.50 U.S. Int. Rev. Stamps, affixed and cancelled.

STATE OF SOUTH CAROLINA,
COUNTY OF DORCHESTER.

WHEREAS the late Barnwell E. Myers, also known as Barney Myers, departed this life testate on the 17th day of December, 1966 seized and possessed of the hereinafter described premises inter alia and by his Last Will and Testament devised the hereinafter described premises to his beloved wife, Hazel M. Myers.

KNOW ALL MEN BY THESE PRESENTS, THAT

I, HAZEL M. MYERS, Individually and as Executrix and sole Devisee under the Last Will and Testament of the late Barnwell E. Myers,

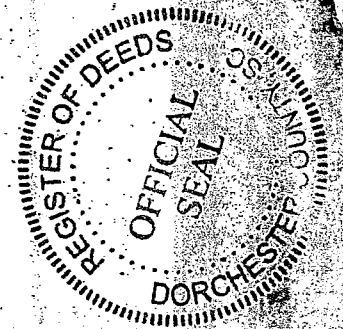
In the State aforesaid _____ in consideration of the sum of
One Hundred Twenty-four Thousand Seven Hundred Ten DOLLARS (\$124,710.00) ~~XXXXXXX~~
to me ~~XXXXXX~~ paid ~~XXXXXXX~~ in cash by AMERICAN MORTGAGE & INVESTMENT COMPANY

_____ in the State aforesaid _____ (receipt whereof is hereby
acknowledged) have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release unto the said AMERICAN
MORTGAGE & INVESTMENT COMPANY

All that certain Piece, Parcel or Tract of Land situate, lying and being in the Village of Knights-ville, County of Dorchester, State of South Carolina, measuring and containing Four Hundred Fifteen and Seven-tenths (415.7) Acres, more or less, butting and bounding and having such courses and distances as follows, to wit: Beginning at a stake on the northeasternmost corner of the Tract and running N 89°W along Lands now or formerly of Tucker for a distance of One Thousand Five Hundred Ninety-one (1,591) Feet to a concrete marker; thence running West for a distance of One Thousand Nine Hundred Thirty-five (1,935) Feet along Lands now or formerly of the Estate of Elmore to a stake; thence running S 30°30'W for a distance of One Thousand Four Hundred Sixty-seven (1,467) Feet along Lands of Darlington Veneer Co. to a stake; thence running S 66°W for a distance of One Thousand Two Hundred Eighty-seven (1,287) Feet along Lands of the said Darlington Veneer Co. to a stake; thence running S 46°30'W for a distance of Sixty-one and Three-tenths (61.3) Feet along Lands of the said Darlington Veneer Co. to a stake; thence running S 88°W for a distance of Five Hundred Five (505) Feet along Lands of the said Darlington Veneer Co. to an iron; thence running S 25°W for a distance of Eight and Fifty One-hundredths (8.50) Chains along Lands of Darlington Veneer Co. and Lands of the Commissioners of Public Works of the City of Charleston to an iron; thence running S 3°30'W for a distance of Thirty-one and Twenty One-hundredths (31.20) Chains along Lands of the Commissioners of Public Works of the City of Charleston to a stake; thence running in a northeasterly direction for a distance of Ten and Three One-hundredths (10.03) Chains and One Thousand Four Hundred Ninety-eight (1,498) Feet along Lands of Allen Myers to a stake; thence running N 77°E Three Hundred Ninety (390) Feet; N 80°E Four Hundred Seventy-three (473) Feet; N 82°E Four Hundred Three (403) Feet; N 80°E Six Hundred Forty-eight (648) Feet; N 81°E Two Hundred Thirty-one (231) Feet; N 80°30' E Three Hundred (300) Feet; N 79°E Three Hundred (300) Feet; N 80°15' E Six Hundred (600) Feet; N 81°E Three Hundred (300) Feet; N 81°30' E Six Hundred (600) Feet; N 81°E Six Hundred (600) Feet; N 80°30' E Eight Hundred (800) Feet; N 79°E Three Hundred (300) Feet; N 81°E One Hundred Eighty-two (182) Feet; and N 81°30' E One Hundred Eighty-nine (189) Feet to a pipe, all of which is along Lands of Allen Myers; thence running N 80°E for a distance of Three Hundred Ninety-seven (397) Feet along other Lands of the Estate of Barnwell E. Myers to a stake; thence running N 36°30'W for a distance of Two Thousand One Hundred Seventy-eight (2,178) Feet along other Lands of the Estate of Barnwell E. Myers to a stake; thence running N 5°E for a distance of One Thousand Seven Hundred Forty-two (1,742) Feet along other lands of the Estate of Barnwell E. Myers, to a stake, the point of beginning.

The above-described Tract of Land will more fully appear reference being had to a Plat of the same by J.N. Frank, Surveyor, dated July 30, 1966 and recorded in Plat Book _____ at Page _____, RMC Office for Dorchester County, reference to which is hereby craved and made a part and parcel hereof.

The above-described Tract of Land is a portion of that Tract of Land devised to the late Barnwell E. Myers by the late Joseph Myers who departed this life testate on the 16th day of November, 1937 and devised by the said Barnwell E. Myers, who departed this life testate on the 17th day of December, 1966, to Hazel M. Myers.



A TRUE COPY

MARGARET L. BAILEY
REGISTER OF DEEDS
DORCHESTER COUNTY, SC
DATE 11/1/2008

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72

TOGETHER with all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises belonging, or in any-wise incident or appertaining.

TO HAVE AND TO HOLD, all and singular, the said Premises before mentioned unto the said AMERICAN MORTGAGE & INVEST-
MENT COMPANY, its Heirs and Assigns forever.

AND I do hereby bind myself and my Heirs, and
Executors and Administrators, to warrant and forever defend, all and singular, the said Premises unto the said AMERICAN MORTGAGE &
INVESTMENT COMPANY, its

Heirs and Assigns, against me and my Heirs and all persons whomsoever
lawfully claiming, or to claim the same or any part thereof.

WITNESS my Hand and Seal, this 23rd day of June, in the year of our Lord
one thousand nine hundred and sixty-seven and in the one hundred and ninety-first year of the
Sovereignty and Independence of the United States of America.

Signed, Sealed and Delivered in the Presence of

Karen S. Taylor

Hazel M. Myers (L. S.)

N.H. Hamilton

(L. S.)

~~THE~~ STATE OF SOUTH CAROLINA,
COUNTY OF DORCHESTER

PERSONALLY appeared before me Karen S. Taylor and made oath that she
saw the within named HAZEL M. MYERS
sign, seal, and as her act and deed, deliver the within-written Deed, and that she with N.H. Hamilton
witnessed the execution thereof.

SWORN to before me, this 23rd
day of June, A. D. 1967

(NOTARIAL SEAL) N.H. Hamilton (SEAL)
Notary Public ~~for~~ South Carolina

Karen S. Taylor

THE STATE OF SOUTH CAROLINA,
County.

NO RENUNCIATION OF DOWER
WOMAN GRANTOR

I, _____, a Notary Public for South Carolina,
do hereby certify unto all whom it may concern, that Mrs.

the wife of the within-named _____
did this day appear before me, and upon being privately and separately examined by me, did declare that she does freely, voluntarily, and
without any compulsion, dread or fear of any person or persons whomsoever, renounce, release and forever relinquish unto the within-named

Heirs and assigns, all her interest and estate, and also all her right and claim of dower, of, in or to all and singular the premises within
mentioned and released.

Given under my Hand and Seal, this _____ day of _____ Anno Domini 19____

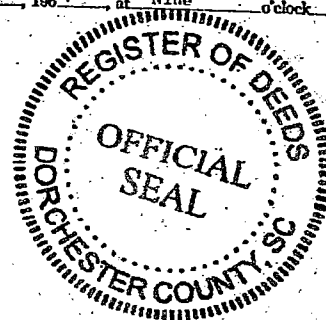
(SEAL)
Notary Public of-for South Carolina

Filed and recorded this 24th day of June, 1967 at Nine o'clock A. M.

Mailed To: N.H. Hamilton, Attorney

P.O. Box 9

Summerville, S.C. 29483



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Anonymous Summary & Analysis of Deed Records

Certified Copy Information:

- Official certified copies from Dorchester County Register of Deeds.
- One deed certified in 2005; another recorded January 7, 1911.
- Both are legally valid chain-of-title records.

What the Deeds Show:

- Private transfers of land in Dorchester County; no county or public involvement.
- The 1910-1911 deed reflects a sale between private parties, recorded when Dorchester began formal deed books.
- Later deeds (2005 copy) trace ownership back to 1857.

Key Legal Features:

- Warranty clauses confirm permanent private ownership.
- Dower renunciation clears future ownership disputes.
- References to deeds as far back as 1857 establish root of title.

Historical Significance:

- 1911 date marks start of Dorchester's deed recording, not public ownership.
- 1857 reference confirms more than 150 years of private conveyances.
- No dedication or transfer to Dorchester County ever occurred.

Quiet Title Relevance:

1. Chain of private ownership from 1857 through present.
2. No record of public dedication or county acceptance.
3. Over a century of uninterrupted private use and control.

Conclusion:

These deeds confirm Wise Lane has always been private property, conveyed only through private transfers for over 150 years. There is no evidence of county acceptance or public dedication. These records are strong supporting evidence for the Quiet Title action.

State of South Carolina,
COUNTY.

LAW BLANK-FORM No. 14-TITLE TO REAL ESTATE
WALKER, STARR & CORPUS CO., MANUFACTURING STATISTICIANS, CHARLESTON, S. C.

KNOW ALL MEN BY THESE PRESENTS, THAT
We, Jones Bros of Bamberg, South Carolina

in the State aforesaid.

Twenty five

in consideration of the sum of

to

in hand paid at and before the sealing of these Presents, by *Eugene Reeves*

Dollars,

in the State aforesaid (the receipt whereof is hereby acknowledged), have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release unto the said *Eugene Reeves* all that piece parcel or tract of land lying and being in *Dorchester County*, in *Dorchester County*, in said State, containing *one acre and bounded as follows: On the North by lands of Ed of Morgan Quett; On the East by lands of Mrs E & Co Elmhurst; On the South by lands of Ed of James R. Wife and Rich by lands of W. R. W. Ed as per a plat made by W. E. Griffith with survey dated Dec. 16th 1857, will more fully show appear. The same being being being a tract of land due to Jones Bros by Eugene Reeves February 24 1903, as additional security for a mule colored or black mare, mule purchased from said Jones Bros of Bamberg South Carolina by the said Eugene Reeves, making the debt given by Eugene Reeves to Jones Bros on said date and recorded in Book 57 of Deeds of Dorchester County in said State on page 135 of said Book of Deeds. Making said deed given to Jones Bros by the said Eugene Reeves nothing more than an equitable mortgage and the said debt being paid and full we hereby convey to Eugene Reeves all the interest we had given us by reason of deed mentioned herein.*



7

A TRUE COPY
Margaret L. Bailey
MARGARET L. BAILEY
REGISTER OF DEEDS
DORCHESTER COUNTY SC
DATE 9/11/1903

TOGETHER with, all and singular, the Rights, Members, Hereditaments and Appurtenances to the said Premises belonging, or in any-wise incident or appertaining.

TO HAVE AND TO HOLD, all and singular, the said Premises before mentioned unto the said Eugene Reeves, his

Heirs and Assigns forever,

AND we do hereby bind ourselves and our Heirs, Executors and Administrators to warrant and forever defend all and singular the said Premises unto the said Eugene Reeves, his

Heirs and Assigns, against us and our Heirs

lawfully claiming, or to claim the same, or any part thereof.

WITNESS us Hand and Seal, this 29th day of December in the year of our Lord one thousand nine hundred and four and in the one hundred and 29th year of the Sovereignty and Independence of the United States of America.

Signed, Sealed and Delivered in the Presence of _____

A. G. Hill
John A. Hill

James Bras

(L. S.)

(L. S.)

THE STATE OF SOUTH CAROLINA,

Bamberg COUNTY.

Personally appeared before me A. G. Hill

and made oath that he saw the within named James Bras

sign, seal and as thus act and deed, deliver the within written Deed; and that he with

John A. Hill witnessed the execution thereof.

SWORN before me, this 29th

day of December A. D. 1904

(L. S.) John A. Hill (notary)

Notary Public S.C.

A. G. Hill

Recorded January 7th, 1911

THE STATE OF SOUTH CAROLINA,

_____ COUNTY.

RENUNCIATION OF DOWER.

I, _____ do hereby certify

unto all whom it may concern, that Mrs. _____

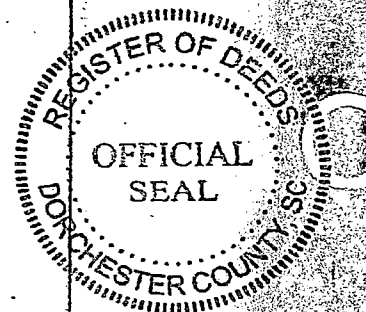
the wife of the within named _____

did this day appear before me and, upon being privately and separately examined by me, did declare that she does freely, voluntarily, and without any compulsion, dread or fear of any person or persons whomsoever, renounce, release and forever relinquish unto the within named _____

Heirs and Assigns all her interest and estate, and also all her right and claim of Dower, of, in, or to all and singular the premises within mentioned and released.

Given under my hand and seal, this _____ day of _____ Anno Domini 19____

(L. S.)



8

MARGARET L BAILEY
DORCHESTER COUNTY
REGISTER OF DEEDS

201 Johnston Street ~ Saint George, SC 29477 (843) 563-0181

*** THIS PAGE IS PART OF THE INSTRUMENT - DO NOT REMOVE ***

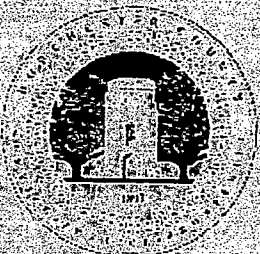


Instrument #:	2025019694	
Receipt Number:	213417	Return To: ATTIA ELBADAWY
Recorded As:	AFFIDAVIT/G	
Recorded On:	September 11, 2025	
Recorded At:	12:41:09 PM	Received From: ATTIA ELBADAWY
Recorded By:	CB	Parties:
Book/Page:	RB 16106: 73 - 75	Direct- ELBADAWY, ATTIA
Total Pages:	3	Indirect- ELBADAWY, ATTIA

*** EXAMINED AND CHARGED AS FOLLOWS ***

Recording Fee: \$10.00
Tax Charge: \$0.00

9



Margaret Bailey

Margaret Bailey - Register of Deeds

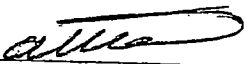
STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER
REGISTER OF DEEDS

**AFFIDAVIT OF MERGER AND EXTINGUISHMENT
OF EASEMENT- WISE LANE**

Personally appeared before me, the undersigned, who being duly sworn, deposes and states as follows:

1. My name is Attia Elbadawy, and I am over the age of 18, competent to testify, and the owner of the properties described herein.
2. On April 30, 2018, I purchased Lots 5 and 6, N-Block of the Twin Lakes Subdivision, Dorchester County, South Carolina, from Olah Perry, by deeds recorded in the Dorchester County Register of Deeds (Olah Perry=Deed Book#153, Page#71, and Attia Elbadawy=Deed Book #16, Page#85).
3. Prior to my ownership, a roadway known as Wise Lane was used as an easement to provide access to these properties.
4. By operation of the "Doctrine of Merger", when the same owner (Attia Elbadawy) acquires both the dominant and servient estates, the easement is extinguished by law.
5. Therefore, upon my acquisition of both Lots 5 and 6 in 2018, the easement known as Wise Lane was legally extinguished and has since existed solely as part of my private property.
6. This affidavit is made for the purpose of clarifying the public record and ensuring that Dorchester County's records reflect the extinguishment of the Wise Lane easement.

I certify that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Signature: 

Attia Elbadawy
Wise Lane
493 Wise Road (911/ mailing address)
Summerville, SC 29483
Date: September 11, 2025

Ret.

**AFFIDAVIT OF MERGER AND EXTINGUISHMENT
OF EASEMENT- WISE LANE
ATTIA ELBADAWY**

NOTARY ACKNOWLEDGMENT

SWORN TO and SUBSCRIBED before me

Attia Elbadawy
Wise Lane
493 Wise Road (911/ mailing address)
Summerville, SC 29483

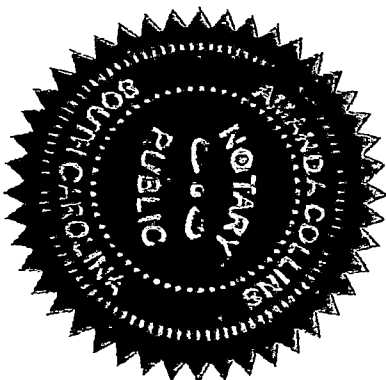
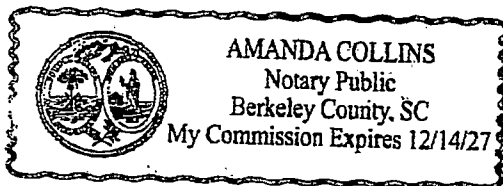
this 11th day of September 2025.



Notary Public for South Carolina



My Commission Expires: 12/14/27



MARGARET L BAILEY
DORCHESTER COUNTY
REGISTER OF DEEDS

201 Johnston Street ~ Saint George, SC 29477 (843) 563-0181

*** THIS PAGE IS PART OF THE INSTRUMENT - DO NOT REMOVE ***



Instrument #: 2018030418

Receipt Number: 56437

Return To: OSHEA LW FIRM

Recorded As: DEED

Recorded On: December 10, 2018

Recorded At: 11:05:45 AM

Received From: OSHEA LW FIRM

Recorded By: CB

Parties:

Book/Page: RB 11662: 298 - 302

Direct- PERRY, OLAH H

Total Pages: 5

Indirect- ELBADAWY, ATTIA

*** EXAMINED AND CHARGED AS FOLLOWS ***

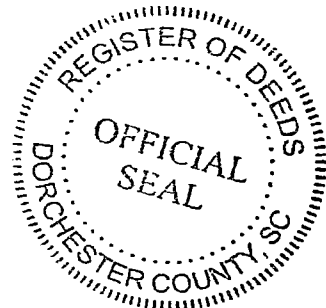
Recording Fee: \$10.00

Exempt

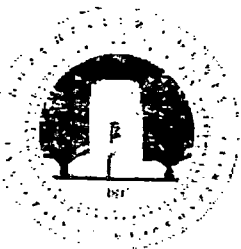
Tax Charge: \$0.00

RECEIVED
2018 DEC -13 PM 01:56
DORCHESTER CO ASSESSORS OFFICE

RECEIVED 13th Day
of DECEMBER 2018
JAMES MESSERVY, JR
Auditor Dorchester County SC



12



A TRUE COPY
Margaret L Bailey
MARGARET L BAILEY
REGISTER OF DEEDS
DORCHESTER COUNTY SC
DATE 12/10/2018

Margaret Bailey

Margaret Bailey - Register of Deeds

MARGARET L BAILEY
DORCHESTER COUNTY
REGISTER OF DEEDS

201 Johnston Street ~ Saint George, SC 29477 (843) 563-0181

** Deed being re-recorded
to correct legal
description and
Grantee's address

*** THIS PAGE IS PART OF THE INSTRUMENT - DO NOT REMOVE ***



FILED/RECORDED
DECEMBER 10, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS



Instrument #: 2018010487

Receipt Number: 44582

Return To: OSHEA LAW FIRM LLC

Recorded As: DEED

Recorded On: May 02, 2018

Recorded At: 11:30:48 AM

Received From: OSHEA LAW FIRM LLC

Recorded By: KU

Parties:

Direct- PERRY, OLAH H

Indirect- ELBADAWY, ATTIA

Book/Page: RB 11334: 21 - 24

Total Pages: 4

*** EXAMINED AND CHARGED AS FOLLOWS ***

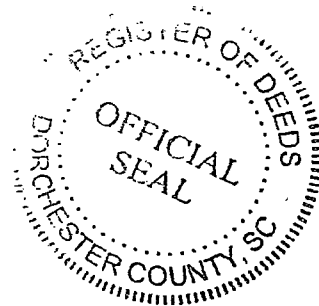
Recording Fee: \$10.00

Consideration: \$23,500.00

County Tax: \$25.85

State Tax: \$61.10

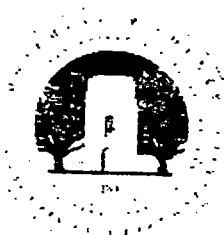
Tax Charge: \$86.95



13

Margaret Bailey

Margaret Bailey - Register of Deeds



PREPARED BY:

O'SHEA LAW FIRM, LLC
1120 FOLLY ROAD
CHARLESTON, SC 29412

FILED/RECORDED
DECEMBER 10, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS

FILED/RECORDED
May 2, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS



SPACE ABOVE THIS LINE RESERVED FOR RECORDING INFORMATION

THE STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

TITLE TO REAL ESTATE

KNOW ALL MEN BY THESE PRESENTS, That, I, **Olah H. Perry a/k/a Olah Hodges Perry**, herein referred to as the Grantor, for valuable consideration to me paid by **Attia Elbadawy**, hereinafter Grantee, in the State aforesaid, the receipt and sufficiency whereof is hereby acknowledged, has granted, bargained, sold and released, and by these presents does grant, bargain, sell and release unto the said Grantee, her heirs, successors and assigns forever:

All that certain piece, parcel or lot of land, together with any improvements thereon, situate, lying and being near the Town of Summerville, in the County of Dorchester, State of South Carolina, being described as LOT FIVE (5) in BLOCK N, of TWIN * and Lot 6 LAKES SUBDIVISION, as shown on Plat prepared by J. N. Frank dated February 14, 1967, and recorded in the Office of the Register of Deeds for Dorchester County in Plat Book 16 at page 85.

The above plat is incorporated herein by reference and is made a part hereof for a more complete and accurate description. All measurements shown on said plat are a little more or less.

This being a portion of the property conveyed to Cleveland O. Perry and Olah H. Perry by Deed dated July 17, 1974 and recorded August 8, 1974 in the Office of the Register of Deeds for Dorchester County in Book 236 at Page 281. Cleveland O. Perry subsequently died testate on or about February 23, 1985, leaving his Last Will and Testament devising said property to Olah Hodges Perry as evidenced by Dorchester County Probate Case No. 1985-ES-18-170.

TAX MAP NUMBER: 142-04-00-019 and 142-04-00-018

GRANTEE'S ADDRESS: ~~1742 Sam Rittenberg Boulevard~~
444 Ashburton Drive, Goose Creek SC 29445

This conveyance is made subject to easements, restrictions, covenants, and conditions of record, including matters shown on recorded plats.

TOGETHER with all and singular, the rights, members, hereditaments and appurtenances to the said premises belonging, or in any wise incident or appertaining.

TO HAVE AND TO HOLD, all and singular the said premises before mentioned unto the said Grantee, her heirs and assigns forever.

AND THE GRANTOR does hereby bind Grantor's heirs, executors and administrators, to warrant and forever defend all and singular the said premises unto the said Grantee, her heirs and assigns, against the Grantor and the Grantor's heirs and against every person whomsoever lawfully claiming or to claim, the same or any part thereof.

WITNESS My Hand and Seal this 30th day of April, 2018.

FILED/RECORDED
DECEMBER 10, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:

Janice L. Carroll

Witness

Olah H. Perry

OLAH H. PERRY a/k/a Olah Hodges Perry

Ian O'Shea

Witness

FILED/RECORDED
May 2, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS

THE STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

ACKNOWLEDGMENT

The foregoing instrument was acknowledged before me this 30th day of April, 2018, by the Grantor(s), Olah H. Perry.

SWORN to before me this 30th day of April, 2018

Ian O'Shea

(L.S.)

Notary Public for South Carolina

Commission Expires: 9/10/2023



STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

AFFIDAVIT

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this affidavit and I understand such information.
2. The property being transferred is located at 0 Wise Lane, Dorchester, SC 29483, bearing Dorchester County Tax Map Number 142-04-00-019, and was transferred by Olah H. Perry a/k/a Olah Hodges Perry to Attia Elbadawy on April 30, 2018.
3. Check one of the Following: The Deed is
- (a) XX Subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
- (b) _____ Subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
- (c) _____ Exempt from the deed recording fee because (See Information section of this affidavit);

(If exempt, please skip items 4-7, and go on to item 8 of this affidavit.)

If exempt under exemption #14 as described in the information section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase realty? Check Yes _____ or No _____

4. Check one of the following if either item 3(a) or item 3(b) above has been checked (See Information section of this affidavit):

- (a) XX The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$23,500.00.
- (b) _____ The fee is computed on the fair market value of the realty which is _____.
- (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is _____.

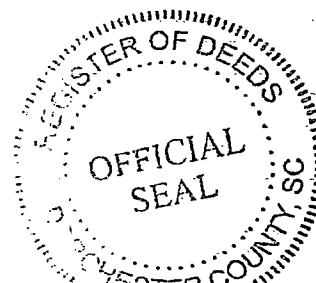
5. Check Yes _____ or No XX to the following: A lien or encumbrance existed on the land, tenement or realty before the transfer and remained on the land, tenement or realty after the transfer. If "Yes," the amount of the outstanding balance of this lien or encumbrance is: N/A.

6. The deed recording fee is computed as follows:

- (a) Place the amount listed in item 4 above here: \$23,500.00
- (b) Place the amount listed in item 5 above here: \$ 0.00
(If no amount is listed, place zero here.)
- (c) Subtract line 6(b) from line 6(a) and place result here: \$23,500.00

7. The deed recording fee due is based on the amount listed on line 6(c) above and the deed recording fee due is: \$86.95.8. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Attorney.

9. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

SWORN to before me this 30th day of April, 2018.Janice L. Carroll
Notary Public for South CarolinaMy Commission Expires: 11/19/23Ian O'Shea
Responsible Person Connected with the TransactionIan O'Shea
Print or type the above name here

16

163-71

Form 14-Title to Real Estate

Revised 1925

\$250.00 S.C. Doc. Stamps, and \$137.50 U.S. Int. Rev. Stamps, affixed and cancelled.

STATE OF SOUTH CAROLINA,

COUNTY OF DORCHESTER

WHEREAS the late Barnwell E. Myers, also known as Barney Myers, departed this life testate on the 17th day of December, 1966 seized and possessed of the hereinafter described premises inter alia and by his Last Will and Testament devised the hereinafter described premises to his beloved wife, Hazel M. Myers.

KNOW ALL MEN BY THESE PRESENTS, THAT

I, HAZEL M. MYERS, Individually and as Executrix and sole Devisee under the Last Will and Testament of the late Barnwell E. Myers,

in the State aforesaid _____ in consideration of the sum of
One Hundred Twenty-four Thousand Seven Hundred Ten DOLLARS (\$124,710.00) _____
to me _____ paid by _____ by AMERICAN MORTGAGE & INVESTMENT COMPANY

_____ in the State aforesaid _____ this (receipt whereof is hereby
acknowledged) have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release unto the said AMERICAN
MORTGAGE & INVESTMENT COMPANY

All that certain Piece, Parcel or Tract of Land situate, lying and being in the Village of Knights-ville, County of Dorchester, State of South Carolina, measuring and containing Four Hundred Fifteen and Seven-tenths (415.7) Acres, more or less, butting and bounding and having such courses and distances as follows, to wit: Beginning at a stake on the northeasternmost corner of the Tract and running N 89°W along Lands now or formerly of Tucker for a distance of One Thousand Five Hundred Ninety-one (1,591) Feet to a concrete marker; thence running West for a distance of One Thousand Nine Hundred Thirty-five (1,935) Feet along Lands now or formerly of the Estate of Elmore to a stake; thence running S 30°30'W for a distance of One Thousand Four Hundred Sixty-seven (1,467) Feet along Lands of Darlington Veneer Co. to a stake; thence running S 66°W for a distance of One Thousand Two Hundred Eighty-seven (1,287) Feet along Lands of the said Darlington Veneer Co. to a stake; thence running S 46°30'W for a distance of Sixty-one and Three-tenths (61.3) Feet along Lands of the said Darlington Veneer Co. to a stake; thence running S 88°W for a distance of Five Hundred Five (505) Feet along Lands of the said Darlington Veneer Co. to an iron; thence running S 25°W for a distance of Eight and Fifty One-hundredths (8.50) Chains along Lands of Darlington Veneer Co. and Lands of the Commissioners of Public Works of the City of Charleston to an iron; thence running S 3°30'W for a distance of Thirty-one and Twenty One-hundredths (31.20) Chains along Lands of the Commissioners of Public Works of the City of Charleston to a stake; thence running in a northeasterly direction for a distance of Ten and Three One-hundredths (10.03) Chains and One Thousand Four Hundred Ninety-eight (1,498) Feet along Lands of Allen Myers to a stake; thence running N 77°E Three Hundred Ninety (390) Feet; N 80°E Four Hundred Seventy-three (473) Feet; N 82°E Four Hundred Three (403) Feet; N 80°E Six Hundred Forty-eight (648) Feet; N 81°E Two Hundred Thirty-one (231) Feet; N 80°30' E Three Hundred (300) Feet; N 79°E Three Hundred (300) Feet; N 80°15'E Six Hundred (600) Feet; N 81°E Three Hundred (300) Feet; N 81°30'E Six Hundred (600) Feet; N 81°E Six Hundred (600) Feet; N 80°30'E Eight Hundred (800) Feet; N 79°E Three Hundred (300) Feet; N 81°E One Hundred Eighty-two (182) Feet; and N 81°30'E One Hundred Eighty-nine (189) Feet to a pipe, all of which is along Lands of Allen Myers; thence running N 8°E for a distance of Three Hundred Ninety-seven (397) Feet along other Lands of the Estate of Barnwell E. Myers to a stake; thence running N 36°30'W for a distance of Two Thousand One Hundred Seventy-eight (2,178) Feet along other Lands of the Estate of Barnwell E. Myers to a stake; thence running N 5°E for a distance of One Thousand Seven Hundred Forty-two (1,742) Feet along other lands of the Estate of Barnwell E. Myers, to a stake, the point of beginning.

The above-described Tract of Land will more fully appear reference being had to a Plat of the same by J.N. Frank, Surveyor, dated July 30, 1966 and recorded in Plat Book _____ at Page _____, RMC Office for Dorchester County, reference to which is hereby craved and made a part and parcel hereof.

The above-described Tract of Land is a portion of that Tract of Land devised to the late Barnwell E. Myers by the late Joseph Myers who departed this life testate on the 16th day of November, 1937 and devised by the said Barnwell E. Myers, who departed this life testate on the 17th day of December, 1966, to Hazel M. Myers.

17

Summerville, S.C. 29483

18

PETITION OF LEGAL LANDOWNER

My name is Steven Meyer, I live at 510 Wise Road, Summerville, S.C. 29483
TMS #142-04-00-025.000 and TMS# 142-04-00-057.000. I give my consent to
Attia Elbadawy, who lives at 493 Wise Lane, Summerville, S.C. 29483
(493 Wise Road serves for 911 purposes)
Attia Elbadawy-TMS# 142-04-00-04-018-000 and TMS# 142-04-00-019.000
to have full sole ownership over Wise Lane- Westside as his own driveway
Also, I give my consent to keep the black metal gate on his driveway to his home.

On this 16th day of May, 2025, before me personally appeared Steven Meyer to know
executed the same for the purposes therein contained.
to be the person whose name is subscribed to the foregoing document, and acknowledged that he

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

Notary Public for South Carolina

My Commission Expires: 5/16/2029

Signed this 16th day of May, 2025.

Yareli

Steven Meyer
510 Wise Road
Summerville, SC 29483

19

Steven Meyer
Steven Meyer

State of: South Carolina
County of: Berkley
The foregoing instrument was acknowledged
before me 16th day of May, 2025
Yareli
Notary Public
My Commission Expires 5/16/2029

PETITION OF LEGAL LANDOWNER

My name is Sylvie Sirois, I own 501 Wise Road, Summerville, S.C. 29483
TMS #142-04-00-027.000 and TMS# 142-04-00-028.000. I give my consent to
Attia Elbadawy, who lives at 493 Wise Lane, Summerville, S.C. 29483
(493 Wise Road serves for 911 purposes)
Attia Elbadawy-TMS# 142-04-00-04-013-000 and TMS# 142-04-00-019.000
to have full sole ownership over Wise Lane- Westside as his own driveway
Also, I give my consent to keep the black metal gate on his driveway to his home.

I only give consent to Attia Elbadawy who lives at 493 Wise Lane to have ownership
of the section of Wise Lane from his gate to his property. I do not give consent to
ownership of the section of Wise Lane that leads to my residence or my immediate
neighbors property.

On this 2nd day of June, 2025, before me personally appeared Sylvie Sirois, to know
executed the same for the purposes therein contained.
to be the person whose name is subscribed to the foregoing document, and acknowledged that he

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

Notary Public for South Carolina

My Commission Expires: 07/05/2034

Signed this 2nd day of June, 2025.

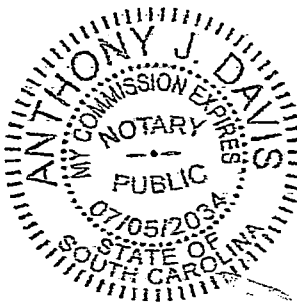
Anthony J. Davis

Sylvie Sirois
501 Wise Road
Summerville, SC 29483

Sylvie Sirois

Sylvie Sirois

Daryl Sirois



20

PETITION OF LEGAL LANDOWNER

My name is Amanda Wise, I live at 502 Wise Road, Summerville, S.C. 29483
TMS #142-04-00-022.000, I give my consent to Attia Elbadawy who lives at
493 Wise Lane, Summerville, S.C. 29483 (493 Wise Road serves as 911 purposes)
Attia Elbadawy-TMS# 142-04-00-04-018-000 and TMS# 142-04-00-019.000
to have full sole ownership over Wise Lane- Westside as his own driveway
Also, I give my consent to keep the black metal gate on his driveway to his home.

On this 15 day of MAY, 2025, before me personally appeared Amanda Wise to know

executed the same for the purposes therein contained.
to be the person whose name is subscribed to the foregoing document, and acknowledged that he

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

Notary Public for South Carolina-

My Commission Expires 19 June 2028

Signed this 15 day of May, 2025.

Melissa A. Kahley

Amanda Wise
502 Wise Road
Summerville, SC 29483

Amanda Wise
Amanda Wise

MELISSA A. KAHLEY
Notary Public - State of South Carolina
My Commission Expires June 19, 2028

21

17
PREPARED BY:

O'SHEA LAW FIRM, LLC
1120 FOLLY ROAD
CHARLESTON, SC 29412

FILED/RECORDED
DECEMBER 10, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS

FILED/RECORDED
May 2, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS

SPACE ABOVE THIS LINE RESERVED FOR RECORDING INFORMATION

THE STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

) TITLE TO REAL ESTATE
)

KNOW ALL MEN BY THESE PRESENTS, That, I, **Olah H. Perry a/k/a Olah Hodges Perry**, herein referred to as the Grantor, for valuable consideration to me paid by **Attia Elbadawy**, hereinafter Grantee, in the State aforesaid, the receipt and sufficiency whereof is hereby acknowledged, has granted, bargained, sold and released, and by these presents does grant, bargain, sell and release unto the said Grantee, her heirs, successors and assigns forever:

All that certain piece, parcel or lot of land, together with any improvements thereon, situate, lying and being near the Town of Summerville, in the County of Dorchester, State of South Carolina, being described as LOT FIVE (5) in BLOCK N, of TWIN * and Lot 6 LAKES SUBDIVISION, as shown on Plat prepared by J. N. Frank dated February 14, 1967, and recorded in the Office of the Register of Deeds for Dorchester County in Plat Book 16 at page 85.

The above plat is incorporated herein by reference and is made a part hereof for a more complete and accurate description. All measurements shown on said plat are a little more or less.

This being a portion of the property conveyed to Cleveland O. Perry and Olah H. Perry by Deed dated July 17, 1974 and recorded August 8, 1974 in the Office of the Register of Deeds for Dorchester County in Book 236 at Page 281. Cleveland O. Perry subsequently died testate on or about February 23, 1985, leaving his Last Will and Testament devising said property to Olah Hodges Perry as evidenced by Dorchester County Probate Case No. 1985-ES-18-170.

TAX MAP NUMBER: 142-04-00-019 and 142-04-00-018

GRANTEE'S ADDRESS: ~~1742 Sam Rittenberg Boulevard~~
444 Ashburton Drive, Goose Creek SC 29445

This conveyance is made subject to easements, restrictions, covenants, and conditions of record, including matters shown on recorded plats.

TOGETHER with all and singular, the rights, members, hereditaments and appurtenances to the said premises belonging, or in any wise incident or appertaining.

TO HAVE AND TO HOLD, all and singular the said premises before mentioned unto the said Grantee, her heirs and assigns forever.

AND THE GRANTOR does hereby bind Grantor's heirs, executors and administrators, to warrant and forever defend all and singular the said premises unto the said Grantee, her heirs and assigns, against the Grantor and the Grantor's heirs and against every person whomsoever lawfully claiming or to claim, the same or any part thereof.

WITNESS My Hand and Seal this 30th day of April, 2018.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:

Jarice L. Carrell

Witness

Ian O'Shea

Witness

Olah H. Perry
OLAH H. PERRY a/k/a Olah Hodges Perry

FILED/RECORDED
May 2, 2018
DORCHESTER COUNTY
REGISTER OF DEEDS

THE STATE OF SOUTH CAROLINA)

COUNTY OF DORCHESTER)

ACKNOWLEDGMENT

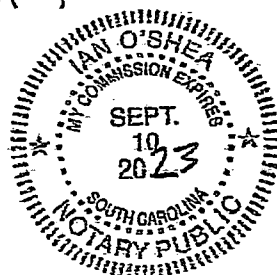
The foregoing instrument was acknowledged before me this 30th day of April, 2018, by the Grantor(s), Olah H. Perry.

SWORN to before me this 30th day of April, 2018

Ian O'Shea (L.S.)

Notary Public for South Carolina

Commission Expires: 9/10/2023



23

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

AFFIDAVIT

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this affidavit and I understand such information.
2. The property being transferred is located at 0 Wise Lane, Dorchester, SC 29483, bearing Dorchester County Tax Map Number 142-04-00-019, and was transferred by Olah H. Perry a/k/a Olah Hodges Perry to Attia Elbadawy on April 30, 2018.
3. Check one of the Following: The Deed is
 - (a) XX Subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) _____ Subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as a distribution to a trust beneficiary.
 - (c) _____ Exempt from the deed recording fee because (See Information section of this affidavit);

(If exempt, please skip items 4-7, and go on to item 8 of this affidavit.)

If exempt under exemption #14 as described in the information section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase realty? Check Yes _____ or No _____

4. Check one of the following if either item 3(a) or item 3(b) above has been checked (See Information section of this affidavit):
 - (a) XX The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$23,500.00.
 - (b) _____ The fee is computed on the fair market value of the realty which is _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is _____.

5. Check Yes _____ or No XX to the following: A lien or encumbrance existed on the land, tenement or realty before the transfer and remained on the land, tenement or realty after the transfer. If "Yes," the amount of the outstanding balance of this lien or encumbrance is: N/A.

6. The deed recording fee is computed as follows:

- | | |
|---|--------------------|
| (a) Place the amount listed in item 4 above here: | <u>\$23,500.00</u> |
| (b) Place the amount listed in item 5 above here:
(If no amount is listed, place zero here.) | <u>\$ 0.00</u> |
| (c) Subtract line 6(b) from line 6(a) and place result here: | <u>\$23,500.00</u> |

7. The deed recording fee due is based on the amount listed on line 6(c) above and the deed recording fee due is: \$86.95.8. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Attorney.

9. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

SWORN to before me this 30th day of April, 2018.

James L. Carroll
Notary Public for South Carolina
My Commission Expires: 11/19/23

Ian O'Shea
Responsible Person Connected with the Transaction

Ian O'Shea
Print or type the above name here

24

 First American Title™	Owner's Policy of Title Insurance
	ISSUED BY First American Title Insurance Company
Schedule A	POLICY NUMBER 5011400-2089649e

Name and Address of Title Insurance Company:

FIRST AMERICAN TITLE INSURANCE COMPANY, 1 First American Way, Santa Ana, California 92707

File No.: 18-067 (ELBADAWY)

Address Reference: 0 Wise Lane A & B
Dorchester, South Carolina 29483

Amount of Insurance: \$ 23,500.00 Premium: \$ 100.00

Date of Policy: April 30, 2018 at 11:30 AM
(or the date and time of the recording of the instrument vesting insured title, whichever is later)

1. Name of Insured:
Attia Elbadawy
2. The estate or interest in the Land that is insured by this policy is:
Fee Simple
3. Title is vested in:
Attia Elbadawy
4. The Land referred to in this policy is described as follows:
SEE ATTACHED EXHIBIT A FOR LEGAL DESCRIPTION

O'SHEA LAW FIRM, LLC
1120 Folly Road
Charleston, SC 29412

By: 
IRO Insurance, LLC, Authorized Signatory

25

 First American Title™	Owner's Policy of Title Insurance ISSUED BY First American Title Insurance Company
EXHIBIT A	POLICY NUMBER 5011400-2089649e

File No.: 18-067 (ELBADAWY)

The Land referred to herein below is situated in the County of Dorchester, State of South Carolina; and is described as follows:

All that certain piece, parcel or lot of land, together with any improvements thereon, situate, lying and being near the Town of Summerville, in the County of Dorchester, State of South Carolina, being described as LOT FIVE (5) in BLOCK N, of TWIN LAKES SUBDIVISION; as shown on Plat prepared by J. N. Frank dated February 14, 1967, and recorded in the Office of the Register of Deeds for Dorchester County in Plat Book 16 at page 85.

The above plat is incorporated herein by reference and is made a part hereof for a more complete and accurate description. All measurements shown on said plat are a little more or less.

26



First American Title™

GENERAL (BLANK) ENDORSEMENT

Issued by

First American Title Insurance Company

Attached to Policy No.: 5011400-2089649e

File No.: 18-067 (ELBADAWY)

This policy is amended as follows:

Exhibit A is hereby amended as follows:

All that certain piece, parcel or lot of land, together with any improvements thereon, situate, lying and being near the Town of Summerville, in the County of Dorchester, State of South Carolina, being described as LOT FIVE (5) and LOT SIX (6) in BLOCK N, of TWIN LAKES SUBDIVISION, as shown on Plat prepared by J. N. Frank dated February 14, 1967, and recorded in the Office of the Register of Deeds for Dorchester County in Plat Book 16 at page 85.

The above plat is incorporated herein by reference and is made a part hereof for a more complete and accurate description. All measurements shown on said plat are a little more or less.

ALL OTHER TERMS AND CONDITIONS REMAIN THE SAME.

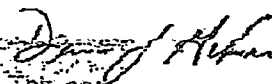
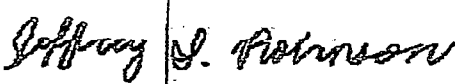
BLOCK N.

This endorsement is made a part of the policy and is subject to all of the terms and provisions thereof and of any prior endorsements thereto. Except to the extent expressly stated, it neither modifies any of the terms and provisions of the policy and any prior endorsements, nor does it extend the effective date of the policy and any prior endorsements, nor does it increase the face amount thereof.

This endorsement shall not be valid or binding unless signed by either a duly authorized officer or agent of the Company.

Date: 04/30/18

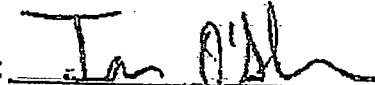
First American Title Insurance Company

Dennis J. Gilmore, President

Jeffrey S. Robinson, Secretary

IRO Insurance, LLC

By: 

Authorized Countersignature

	First American Title™	Owner's Policy of Title Insurance
		ISSUED BY First American Title Insurance Company
Owner's Policy		POLICY NUMBER 5011400-2089649e

Any notice of claim and any other notice or statement in writing required to be given to the Company under this policy must be given to the Company at the address shown in Section 18 of the Conditions.

COVERED RISKS

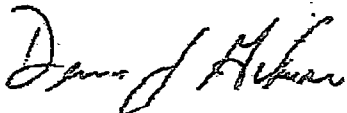
SUBJECT TO THE EXCLUSIONS FROM COVERAGE, THE EXCEPTIONS FROM COVERAGE CONTAINED IN SCHEDULE B, AND THE CONDITIONS, FIRST AMERICAN TITLE INSURANCE COMPANY, a Nebraska corporation (the "Company") insures, as of Date of Policy and, to the extent stated in Covered Risks 9 and 10, after Date of Policy, against loss or damage, not exceeding the Amount of Insurance, sustained or incurred by the Insured by reason of:

1. Title being vested other than as stated in Schedule A.
2. Any defect in or lien or encumbrance on the Title. This Covered Risk includes but is not limited to insurance against loss from
 - (a) A defect in the Title caused by
 - (i) forgery, fraud, undue influence, duress, incompetency, incapacity, or impersonation;
 - (ii) failure of any person or Entity to have authorized a transfer or conveyance;
 - (iii) a document affecting Title not properly created, executed, witnessed, sealed, acknowledged, notarized, or delivered;
 - (iv) failure to perform those acts necessary to create a document by electronic means authorized by law;
 - (v) a document executed under a falsified, expired, or otherwise invalid power of attorney;
 - (vi) a document not properly filed, recorded, or indexed in the Public Records including failure to perform those acts by electronic means authorized by law; or
 - (vii) a defective judicial or administrative proceeding.
 - (b) The lien of real estate taxes or assessments imposed on the Title by a governmental authority due or payable, but unpaid.
 - (c) Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land. The term "encroachment" includes encroachments of existing improvements located on the Land onto adjoining land, and encroachments onto the Land of existing improvements located on adjoining land.
3. Unmarketable Title.
4. No right of access to and from the Land.

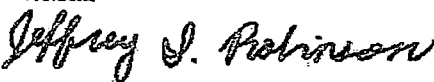
(Covered Risks Continued on Page 2)

In Witness Whereof, First American Title Insurance Company has caused its corporate name to be hereunto affixed by its authorized officers as of Date of Policy shown in Schedule A.

First American Title Insurance Company



Dennis J. Gilmore
President



Jeffrey S. Robinson
Secretary

For Reference:

File #: 18-067 (ELBADAWY 0)

Issued By:

O'Shea Law Firm, LLC
1120 Folly Road
Charleston, SC 29412

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(This Policy is valid only when Schedules A and B are attached)

This packet was created electronically and constitutes an original document

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 First American Title™	Owner's Policy of Title Insurance
Schedule B	ISSUED BY First American Title Insurance Company POLICY NUMBER 5011400-2089649e

File No.: 18-067 (ELBADAWY)

PART I

EXCEPTIONS FROM COVERAGE

This policy does not insure against loss or damage, and the Company will not pay costs, attorneys' fees, or expenses that arise by reason of:

1. (a) Taxes or assessments that are not shown as existing liens by the records of any taxing authority that levies taxes or assessments on real property or by the Public Records; (b) proceedings by a public agency that may result in taxes or assessments, or notices of such proceedings, whether or not shown by the records of such agency or by the Public Records.
2. Any facts, rights, interests, or claims that are not shown by the Public Records but that could be ascertained by an inspection of the Land or that may be asserted by persons in possession of the Land.
3. Easements, liens or encumbrances, or claims thereof, not shown by the Public Records.
4. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the Title that would be disclosed by an accurate and complete land survey of the Land and not shown by the Public Records.
5. Any mineral or mineral rights leased, granted or retained by current or prior owners.
6. Taxes and assessments for the year 2018 and subsequent years, not yet due and payable.
7. Easement to Southern Bell Telephone and Telegraph Company recorded in Book 154 at page 226.
8. Easement to South Carolina Electric and Gas Company recorded in Book 176 at page 175.
9. Easement to South Carolina Water and Sewer recorded in Book 176 at page 175.

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**The State of South Carolina,
COUNTY OF DORCHESTER**

WHEREAS at a duly called meeting of the Board of Directors of American Mortgage & Investment Company, it was unanimously resolved that the Corporation convey the premises hereinafter described unto CLEVELAND O. PERRY and OLAH H. PERRY, for the consideration of TWO THOUSAND FIVE HUNDRED and NO/100 (2,500.00) DOLLARS and that the proper officers of the Corporation, upon the payment of such sum, be authorized and directed to make, execute and deliver the Title to Real Estate to effectuate such conveyance.

NOW, THEREFORE,

KNOW ALL MEN BY THESE PRESENTS, That

AMERICAN MORTGAGE & INVESTMENT COMPANY

in the State aforesaid, for/and in consideration of the sum of
TWO THOUSAND FIVE HUNDRED and NO/100 (2,500.00)-----Dollars
to it in hand paid at and before the sealing of these presents, by CLEVELAND O. PERRY and
OLAH H. PERRY
in the State aforesaid, County aforesaid, (the receipt whereof is hereby acknowledged)
have granted, bargained, sold and released, and by these Presents do grant, bargain, sell and release, un-
to the said CLEVELAND O. PERRY and OLAH H. PERRY, their heirs and assigns:

ALL those certain pieces, parcels or lots of land, situate, lying and being near the Town of Summerville, in the County of Dorchester, State of South Carolina described as Lots Nos. 5 and 6, in Block N, of Twin Lakes Subdivision, reference being had to a Plat of the same by J. N. Frank, dated February 14, 1967, reference to which is hereby craved and made a part and parcel hereof so far as the same pertains to said Lots No. 5 and 6, in Block N, of the said Twin Lakes Subdivision.

THE above described lots of land are the identical lots of land conveyed to the said American Mortgage & Investment Company by Hazel M. Myers by Deed dated the 23rd day of June, 1967, and recorded in Deed Book No. 153, at Page No. 71, Office of the Clerk of Court, Dorchester County.

CLEVELAND O. and OLAH H. PERRY
RT. 1, BOX 123
ADAMS RUN, S. C. 29426



**DORCHESTER COUNTY
STAMP TAX**

PAID \$2.75
For Arpent & Carr
CLERK OF COURT

E9
17A

30

TOGETHER with all and singular the Rights, Members, Hereditaments and Appurtenances to the said Premises belonging, or in anywise incident or appertaining.

TO HAVE AND TO HOLD, all and singular the said premises before mentioned unto the said CLEVELAND O. PERRY and OLAH H. PERRY, their Heirs and Assigns forever

E9
17B

And the said AMERICAN MORTGAGE & INVESTMENT COMPANY does hereby bind itself

and its successors, to warrant and forever defend all and singular the said premises unto the said CLEVELAND O. PERRY and OLAH H. PERRY, their Heirs and Assigns, against itself and its successors, and all other persons whomsoever lawfully claiming or to claim the same, or any part thereof.

IN WITNESS WHEREOF AMERICAN MORTGAGE & INVESTMENT CO. has caused these presents to be executed in its name by JACK VANE, as its President and by HELEN GOLDSTEIN, as its Secretary-Treasurer and its corporate seal to be hereto affixed this 17th day of JULY in the year of our Lord one thousand nine hundred and SEVENTY-FOUR, and in the one hundred and NINETY-NINTH year of the Sovereignty and Independence of the United States of America.

Signed, Sealed and Delivered in Presence of

AMERICAN MORTGAGE & INVESTMENT CO. (Seal)

Jack K. [Signature]
Witness
[Signature]
Witness

By [Signature]
Jack Vane, as its President
[Signature]
Helen Goldstein, as its Sec. or Treas.

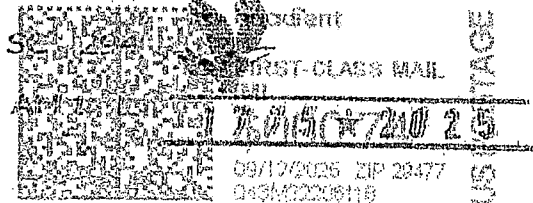
31



Margaret L. Bailey
Register of Deeds
Post Office Box 38
St. George, SC 29477

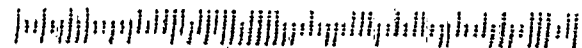
CHARLESTON SC

15 SEP 2025



Attia Elbadawy
493 Wise Road
Summerville, SC 29483

29483-944493



MARGARET L BAILEY
DORCHESTER COUNTY
REGISTER OF DEEDS

201 Johnston Street ~ Saint George, SC 29477 (843) 563-0181

***** THIS PAGE IS PART OF THE INSTRUMENT - DO NOT REMOVE *****



Instrument #: 2025019694

Receipt Number: 213417

Return To: ATTIA ELBADAWY

Recorded As: AFFIDAVIT/G

Recorded On: September 11, 2025

Recorded At: 12:41:09 PM

Received From: ATTIA ELBADAWY

Recorded By: CB

Parties:

Book/Page: RB 16106: 73 - 75

Direct- ELBADAWY, ATTIA

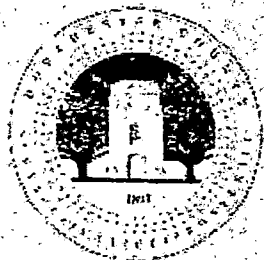
Total Pages: 3

Indirect- ELBADAWY, ATTIA

***** EXAMINED AND CHARGED AS FOLLOWS *****

Recording Fee: \$10.00

Tax Charge: \$0.00



Margaret Bailey

Margaret Bailey - Register of Deeds

**DV Timbers Subdivision
SEWER CALCULATIONS**

Dorchester County, SC

Summary of Effluent Flow

DV Timbers Subdivision – additional improvement sewer will serve 73 single-family dwelling units located in Dorchester County.

REU'S	GPD/REU	GPD
73	250	18,250
Flow = <u>18,250 GPD</u>		

The new system receives flows from two existing units in Dorchester County TMS 142-00-00-018 and 142-00-00-019.

REU'S	GPD/REU	GPD
2	250	500
Total Peak Flow: <u>18,250</u> + 500 = 18,750 GPD		

DORCHESTER COUNTY ILLEGALLY
USED MY 2 TMS # ABOVE
TO GET A PERMIT FOR D.R. HORTON

SOUTH CAROLINA
DORCHESTER COUNTY

COURT OF COMMON PLEAS
CASE # 2025 CP-180152

Statement for Courthouse (St. George)
August 29, 2025

RECEIVED

Sep 02 2025

SC Court of Appeals

1. Defaults under Rule 55, SCRPC

Both Dorchester County and D.R. Horton were properly served in the Quiet Title Action. Neither filed a timely answer. Under Rule 55, South Carolina Rules of Civil Procedure, once a party is in default, they lose the right to file pleadings or motions until the default is first set aside.

Neither the County nor Horton has filed a Motion to Vacate Default. Their filings are untimely and improper, and Mr. Mitchell's failure to file within the deadline is now more than 11 days overdue.

2. Improper Motion to Dismiss

Despite being in default, Mr. Bradley Mitchell filed a Motion to Dismiss.

This violates Rule 55 SCRPC, because a dismissal motion cannot be filed while a default is still in effect.

The correct procedure is:

- (a) file a Motion to Vacate Default,
- (b) obtain a ruling,
- (c) only then file any other pleadings. This procedure has not been followed.

3. Horton's Irregular Filing

D R Horton never filed anything on its own behalf.

The County, through Mr. Mitchell, appears to be filing on D R Horton's behalf.

This is improper because under Rule 12 SCRPC, each defendant must answer or move independently. One party cannot file pleadings for another.

4. September 15th Hearing

A hearing is scheduled for September 15th, but under Rule 55(b)(2) SCRPC, the correct next step after default is default judgment, not a hearing on dismissal. Scheduling this hearing while both defendants remain in default is a violation of proper procedure.

Judge Murphy should not be presiding over this matter because of the conflict of interest already raised.

5. Record Irregularities

Every other party's record was updated by August 18th.

Mr. Mitchell's entry remains incomplete and untimely, raising questions about improper handling of the record.

6. Accountability

These are clear violations of Rule 55 and Rule 12 SCRPC. All filings are required to be made in a timely fashion, and a delay of more than 11 days is unacceptable.

If these defaults and irregularities are ignored, they will be reviewed by the South Carolina Court of Appeals.

Attia Elbadawy
493 Wise Road
Summerville, SC 29483



Dorchester County Assessor
201 Johnston Street
St George, SC 29477
PHONE (843) 563-0162 option #5
www.DorchesterCountySC.gov

E18

THIS IS NOT A TAX BILL

PARCEL NUMBER	ACCOUNT NUMBER
142-04-00-019.000	R0024364

NOTICE OF VALUATION, CLASSIFICATION & ASSESSED VALUE

0006 0001618 Automated Process

ELBADAWY ATTIA
6880 RIVERS AVE UNIT 2219
N CHARLESTON SC 29406-5029

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

FAIR MARKET VALUE
\$48,600
LIMITED/CAPPED VALUE
\$48,600
TAXABLE VALUE
48,600

ADDRESS ON FILE: 444 ASHBURTON DR
GOOSE CREEK SC 29445-6646

TAX YEAR	TAX DISTRICT	DATE OF NOTICE	APPEAL DEADLINE DATE	SITES	ACRES
2019	209	08/09/2019	11/7/2019		2.43
REASONS FOR RECEIVING THIS NOTICE			LEGAL DESCRIPTION OF PROPERTY		
Transfer Of Property (ATI) NOV CHANGE			TWIN LAKES LOT: 05 Block: N. WISE LN		

CLASSIFICATION - RATIO %	AGRICULTURAL USE VALUE	ASSESSED VALUE (Not the Tax Amount)
Other Land 6%	The "Limited /Capped Value" cannot exceed 15% of the value from the prior tax year unless there has been an Assessable Transfer of Interest, Acreage Increase or New Construction. However, if the "Fair Market Value" is less than the "Limited/Capped Value," it is selected as the "Taxable Value."	2,920
		TOTAL ASSESSED VALUE IS NOT THE TAX AMOUNT
		4% Legal Residence Applications may be found on the Assessor's Web Page at www.DorchesterCountySC.gov/Assessor

YOU MAY ELECT TO APPEAL YOUR REAL PROPERTY VALUE OR CLASSIFICATION.

PROTEST BY MAIL: If you choose to mail a written objection, you must provide the following information and mail this form to the Assessor. To preserve your right to protest, your written objection must be timely filed or postmarked by the "Appeal Deadline Date." Please attach a letter explaining the basis of your appeal. Certified mailing is recommended. Please make a copy of both sides of this form for your records.

PROTEST IN PERSON: If you choose to present a written objection to the Assessor's Office, you must provide the following information and timely deliver it to the Assessor's Office by the "Appeal Deadline Date." Please attach a letter explaining the basis of your appeal. Please make a copy of both sides of this form for your records.

Please be aware that even if you protest the value, your property taxes still need to be paid by the due date to avoid penalties for the current tax year.

OWNER'S OPINION OF MARKET VALUE (Please attach proof):	All deadlines for filing an objection or appeal must be met in order to preserve your right to appeal. Please review the backside of this form for detailed information on the appeal procedures.	
OWNER/AGENT SIGNATURE:	DATE:	BEST CONTACT TELEPHONE NUMBER:

EXHIBIT C

To: Kacy Byrd <KByrd@dorchestercountysc.gov>

Subject: Re: Wise Rd

[EXTERNAL - This message originated outside our organization. Use caution when clicking links or opening attachments.]

Hi,

Thank you for the statement of private road,(Wise Road)

One more question,

in the future can the county change the road from private to public road?

Lynne

ALA International

On Friday, November 19, 2021, 01:59:38 PM EST, Kacy Byrd <kbyrd@dorchestercountysc.gov> wrote:

Wise Rd is a private road and is not maintained by Dorchester County. Thanks!

RE: Wise Road, Summerville

From: Tiffany Heber (theber@dorchestercountysc.gov)

To: ala_international@yahoo.com

Date: Friday, November 19, 2021 at 01:53 PM EST

I have forwarded your email to Jim Simpson and Kacy Byrd with Public Works and asked them to send you verification of ownership / maintenance for WISE RD.

Thank you,



Tiffany Heber
Land Surveying Technician

Dorchester County
500 N Main St, Box 3, Summerville, SC 29483
Office: (843) 832-0029
Email: theber@dorchestercountysc.gov



From: Andy Garsea <ala_international@yahoo.com>

Sent: Friday, November 19, 2021 1:45 PM

To: Tiffany Heber <theber@dorchestercountysc.gov>

Subject: Wise Road, Summerville

[EXTERNAL - This message originated outside our organization. Use caution when clicking links or opening attachments.]

Thank you

ALA International

33

Fw: Wise Rd

From: Andy Garsea (ala_international@yahoo.com)

To: oznlogisticsllc@yahoo.com

Date: Monday, July 25, 2022 at 12:05 AM EDT

Sent from Yahoo Mail on Android

— Forwarded Message —

From: "Andy Garsea" <ala_international@yahoo.com>

To: "Kacy Byrd" <KByrd@dorchestercountysc.gov>

Sent: Fri, Nov 19, 2021 at 2:35 PM

Subject: Re: Wise Rd

hi,

thank you so much for the information, now we know what the process will be.

we will follow the above guidelines in the future, if needed.

thanks again for all your help

Lynne

ALA International

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On Friday, November 19, 2021, 02:14:36 PM EST, Kacy Byrd <kbyrd@dorchestercountysc.gov> wrote:

A petition would have to be sent to the county. There would need to be proof that the road was built to county standards. Once petitioned the Public Works dept would take the petition before County Council and they would vote whether to accept the road into county maintenance or not. I hope this helps. Let me know if you have any further questions.

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Andy Garsea <ala_international@yahoo.com>

Sent: Friday, November 19, 2021 2:08:50 PM

Fw: Fw:

From: lynne (groominginstyle@yahoo.com)

To: smelbadawy@gmail.com

Date: Wednesday, March 5, 2025 at 03:54 PM EST

----- Forwarded Message -----

From: Smith, Kyle <kyle.smith@claytonhomes.com>

To: lynne <groominginstyle@yahoo.com>

Sent: Saturday, February 11, 2023 at 11:39:20 AM EST

Subject: Fw:

Hey Lynne,

Nick just went out there and said it's not looking good. He thinks the type of dirt/clay that's out there is going to take forever to dry in order to be driving any big machines out there. He mentioned a couple things that would help. One, he thinks you're going to need to bring a lot of dirt to get this property up to par after all this rain. Which of course he can do that or if you guys wanted to bring the dirt in yourselves to build it up. Also he mentioned since they have city sewer out there and theres a clean out right at the end of your street you could go with a septic and a pump station bringing the sewage out to the city sewer instead of the actual septic system with the drainlines. You could save some money that way as an option.

If you have some time do you want to call Nick and let him explain what hes seeing out there? I believe I gave you Nicks number but just in case it's 843-822-6389.

Kyle Smith

Sales Manager

Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

Email kyle.smith@claytonhomes.com

Web claytonhomesofmonckscorner.com

35

Email kyle.smith@claytonhomes.com

Web claytonhomesofmonckscorner.com

From: Tiffany Heber <theber@dorchestercountysc.gov>
Sent: Friday, February 17, 2023 5:13 PM
To: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>
Subject: [EXTERNAL] RE: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

External email: careful w/ links or attachments

Please find attached the address verification letter for Elbadawy (Wise Ln).

Thank you,

 (Tiffany Heber)

From: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>
Sent: Tuesday, February 14, 2023 9:24 AM
To: Tiffany Heber <theber@dorchestercountysc.gov>
Subject: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

[EXTERNAL - This message originated outside our organization. Use caution when clicking links or opening attachments.]

Good morning!

Just checking on the status of the 911 address for this one. I swore I got an email from you recently with Wise lane as the header but I can't find it anywhere now. So I wasn't sure if this one was complete or you guys were still working on it?

Kyle Smith

Sales Manager
Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

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Fw: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

From: lynne (groominginstyle@yahoo.com)

To: smelbadawy@gmail.com

Date: Wednesday, March 5, 2025 at 03:55 PM EST

----- Forwarded Message -----

From: lynne <groominginstyle@yahoo.com>

To: "Kyle.Smith@ClaytonHomes.com" <Kyle.Smith@ClaytonHomes.com>

Sent: Saturday, February 18, 2023 at 12:48:37 PM EST

Subject: Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Hi Kyle,

Thank you for the address

That would be great when Nick starts to work on the septic

keep us informed

thank you

have a good weekend

Sent from Yahoo Mail on Android

On Sat, Feb 18, 2023 at 9:45 AM, Smith, Kyle
<Kyle.Smith@ClaytonHomes.com> wrote:

Good morning,

Looks like we got your address yesterday afternoon. Here is a copy of the official form. Nick is going to check the property out next week and see if it's dry enough for him to start bringing the equipment over there. Do we still have the gate up out there or will he have access to get in there when he comes?

Kyle Smith

Sales Manager

Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083



On Sat, Feb 18, 2023 at 2:52 PM, lynne
<groominginstyle@yahoo.com> wrote:

Hi

That's good let Nick know when he goes there
there is one more thing

We have a neighbor at 151 Weir Road (house on the corner with the spaniel dogs)
we're not very friendly with him and we prefer that NONE of the contractors have any conversations with
him

When I came up to the property and meet Nick by chance he was speaking to him

Now I know Nick didn't go over there and start talking to him

he probably called him over to find out are business,

when I spoke to Nick I did say we're not too friendly with him he's basically nosey
so he said okay,he wouldnt anymore,

So I guess if you can make a note in the file to NOT have any contractors talk to him

This guy is a jerk ,he's basically a troublemaker that causes problems for the small area of homes around
us

Thanks for understanding

Sent from Yahoo Mail on Android

On Sat, Feb 18, 2023 at 2:17 PM, Smith, Kyle
<Kyle.Smith@ClaytonHomes.com> wrote:

Gotcha thank you. I'll let Nick know.

Kyle Smith

Sales Manager

Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

Email kyle.smith@claytonhomes.com

Web claytonhomesofmonckscorner.com

From: lynne <groominginstyle@yahoo.com>

Sent: Saturday, February 18, 2023 2:12 PM

To: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>

Subject: Re: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Sure,just open the gate, and drive down the driveway and then reup gate back together
The gate doesn't have a lock

We just ask that you leave it the way you found it
with placing the signs and making sure it's secure

Sent from Yahoo Mail on Android

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This message and the accompanying documents contain information that belongs to the sender and may

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From: lynne <groominginstyle@yahoo.com>
Sent: Tuesday, February 21, 2023 10:39 PM
To: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>
Subject: Re: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Hi Kyle

So he will go out there tomorrow Wednesday
Bring in all that 30 some loads of dirt
As far as the red truck (Annie) she has been moved out of the way on the 12th
Nick was out there on the 11th
I was out there today and things looked much drier
Attia suggested that if he wants he could put the dirt where the house poles are set up
And please just remember to close the gate when he leaves
I'm going up there on Thursday around 10:00 a.m.
And how things for are progressing
thanks again

Sent from Yahoo Mail on Android

On Tue, Feb 21, 2023 at 4:52 PM, Smith, Kyle
<Kyle.Smith@ClaytonHomes.com> wrote:

Good afternoon!

Nick is wanting to start getting the dirt and material for the septic out there tmrw. Is there any way to get that red truck thats out there moved? He said the septic calls for about 30 loads of dirt so it's going to take up a lot of space when they bring all that in there.

Kyle Smith

Sales Manager
Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

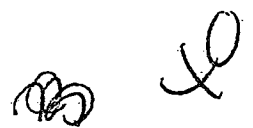
Email kyle.smith@claytonhomes.com

Web claytonhomesofmonckscorner.com

From: lynne <groominginstyle@yahoo.com>
Sent: Saturday, February 18, 2023 3:38 PM
To: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>
Subject: Re: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Great thanks enjoy the rest of your weekend

Sent from Yahoo Mail on Android



<Kyle.Smith@ClaytonHomes.com> wrote:

Good morning,

Nick is out there but said that truck is still in the way. I know you said the red truck, Annie was out of the way. I'm not sure if this is a different truck? But it is in the way for Nick to be working today.

Kyle Smith

Sales Manager
Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

Email kyle.smith@claytonhomes.com

Web claytonhomesofmonckscorner.com

From: lynne <groominginstyle@yahoo.com>

Sent: Wednesday, February 22, 2023 10:21 AM

To: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>

Subject: Re: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Yes the weather has been gorgeous

That sounds great

Then we can get on to the next phase of the project

Thanks about the gate,

Sent from Yahoo Mail on Android

On Wed, Feb 22, 2023 at 9:37 AM, Smith, Kyle
<Kyle.Smith@ClaytonHomes.com> wrote:

Good morning,

Thanks for getting the truck moved I'm sure that will give more flexibility out there. I believe he's just dropping the dirt off today and then should be starting tmrw as long as it's not too wet still. This has been perfect weather this week so as long as that keeps up we should be in good shape. I'll remind him again about the gate as well.

Kyle Smith

Sales Manager
Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

Email kyle.smith@claytonhomes.com



Fw: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

From: Lynne Evener (groominginstyle@yahoo.com)

To: ala_international@yahoo.com

Date: Wednesday, March 5, 2025 at 04:25 PM EST

----- Forwarded Message -----

From: Smith, Kyle <kyle.smith@claytonhomes.com>

To: lynne <groominginstyle@yahoo.com>

Sent: Thursday, February 23, 2023 at 08:19:06 AM EST

Subject: Re: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Perfect I let Nick know. I believe the engineer is also coming out at 9 to see if the property dry enough to start working. He gives the okay when the property is ready for the septic to be installed so hopefully it's not too wet still.

Kyle Smith

Sales Manager

Clayton Homes #238

2680 S Live Oak Drive | Moncks Corner, SC 29461

Phone 843-761-9490 Fax 843-761-0083

Email kyle.smith@claytonhomes.com

Web claytonhomesofmonckscorner.com

From: lynne <groominginstyle@yahoo.com>

Sent: Thursday, February 23, 2023 7:19 AM

To: Smith, Kyle <Kyle.Smith@ClaytonHomes.com>

Subject: Re: [EXTERNAL] Re: Wise Lane TMS 142-04-00-019 ATTIA ELBADAWY

Good morning Kyle

Yes it is the same red truck

We did move her, I guess not far enough

I called Attia and I told him what's going on and he said

If Nick can move the red truck, I will be there with the KEY

Aby 9am this morning

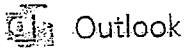
Please let him know

Thanks

Sent from Yahoo Mail on Android

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On Thu, Feb 23, 2023 at 6:43 AM, Smith, Kyle



RE: Elbadawy/D.R. Horton - Wise Road

From Harper, Thomas <Tom.Harper@wbd-us.com>

Date Mon 8/26/2024 6:32 PM

To Landon Brock <lbrock@wiggerlawfirm.com>

📎 2 attachments (766 KB)

Recorded Plat 16 - 85.pdf, Recorded Deed Attia Elbadawy Little Yerby DV Timber 011662 298.pdf

Landon:

I hope that we have answered your client's questions, and I am happy to discuss if he has any others, but we need to put this behind us. As I mentioned, this whole thing should be wrapped up in less than 30 days and the road restored to its prior condition, and Horton would be done working in that ROW. But we need to make progress in the near term.

Your client is interfering with Horton's legal right to install its utilities in the Wise Road ROW. We will need him to remove his property from that public right of way, and stop interfering with Horton's work, before the week is out or Horton will need to take steps to pursue its remedies against this unlawful interference. We would like to avoid that, but your client has already cost them 3 weeks at significant expense to them, and without any legal basis for doing so, a fact which Dorchester County can confirm.

For your reference, I'm attaching a copy of your client's deed, and the plat referenced therein. As you can see, the Wise Road ROW is publicly dedicated on that plat, and is clearly outside of your client's lot lines. He needs to remove his equipment from that public ROW, and stop interfering with my client's legally permitted work.

Please confirm for me by noon on Wednesday that your client will comply. Again, I am happy to answer any questions he may have but we need to wrap this up in the next few days or I'm afraid Horton will need to take other steps to protect its rights.

Thanks.

Tom

From: Harper, Thomas <Tom.Harper@wbd-us.com>

Sent: Thursday, August 22, 2024 7:58 AM

To: Landon Brock <lbrock@wiggerlawfirm.com>

Subject: RE: Elbadawy/D.R. Horton - Wise Road

Landon:

Yes, I just got what I needed from my client yesterday to respond to your request. Just to confirm, you're looking for all Horton's plans and specs and permits for this development? Or is your client just looking to see what's going to happen with Wise Road? We're happy to share it all. If Horton did not have the

DRH_000111

legal right to do this, including having all of its permits, Dorchester County would be stopping it, which it is of course not.

For now, I'm just attaching a copy of their plans & specs. I'm hoping it's not too large to get through to you, but we can upload to the cloud if needed. This shows exactly what Horton is building where, including Wise Road, but as you'll see, the plans have very little to do with Wise Road at all.

I'm assuming your client is primarily concerned about what's going to happen next to his property. As you can see on the plans, Horton is not tying its roads into Wise Road. It's installing water & sewer in the Wise Road right of way — as it is very clearly legally entitled to do, but let's not dwell on that unless we have to — but once those improvements are installed, that will be it for Wise Road as far as this development is concerned. The Horton neighborhood isn't using Wise Road for vehicular or pedestrian access — traffic goes through other roads.

As to your inquiry about timing, Horton has been ready to start on sewer installation for 2 weeks but has been prevented from doing so by your client. The work should take about 3 weeks, assuming the weather cooperates. After the water and sewer installations are complete, Horton will grade the road back to its original state. Then it will be done with Wise Road. In the spring, after everything is built in the development, Dorchester County will come out and inspect the development, including the lines installed in the Wise Road ROW, and that should be the end of it. Home starts would follow, but that wouldn't have anything to do with Wise Road.

Again, as you can see on the plans, other than tying its water & sewer into the Wise Road right of way — which, as everyone including Dorchester County acknowledges, is not owned by your client and which Horton legally is entitled to do — Horton's development isn't connecting to Wise Road. Our owners won't be driving over it to get to their homes. Horton will install the water & sewer in the Wise Road ROW, restore that area to its prior condition, and then be done. Should take fewer than a handful of weeks and then it will be done and behind us.

Please let me know if you have any questions or would like other information.

Also, I do need to say that this needs to be resolved in the next couple of days or Horton is going to have to take steps to protect its rights here. I hope we don't have to get into all of that. I am happy to share a copy of your client's deed of his property, and the plat referenced in that deed, which clearly shows that your client does not own Wise Road, that it's outside of his property, and that Wise Road is a public ROW. As you probably already know but any real estate attorney can tell you, the county's failure to maintain that ROW area does not change that it belongs to the general public, including Horton, and that your client is not allowed to prevent Horton from using that area. Dorchester County owns the Wise Road ROW and it has approved Horton's plans to install water & sewer in that ROW, and Horton will need to take steps to ensure that right is no longer infringed.

Horton wants to be a good neighbor here and that's why it's happy to answer these questions. I will follow up with you tomorrow so that we can get this resolved and move forward. Thanks.

Tom

From: Landon Brock <lbrock@wiggerlawfirm.com>
Sent: Monday, August 19, 2024 4:15 PM
To: Harper, Thomas <Tom.Harper@wbd-us.com>
Subject: Re: Elbadawy/D.R. Horton - Wise Road

DRH 000112

From: Harper, Thomas <Tom.Harper@wbd-us.com>
Sent: Monday, August 26, 2024 6:32 PM
To: Landon Brock <lbrock@wiggerlawfirm.com>
Subject: RE: Elbadawy/D.R. Horton - Wise Road

Landon:

I hope that we have answered your client's questions, and I am happy to discuss if he has any others, but we need to put this behind us. As I mentioned, this whole thing should be wrapped up in less than 30 days and the road restored to its prior condition, and Horton would be done working in that ROW. But we need to make progress in the near term.

Your client is interfering with Horton's legal right to install its utilities in the Wise Road ROW. We will need him to remove his property from that public right of way, and stop interfering with Horton's work, before the week is out or Horton will need to take steps to pursue its remedies against this unlawful interference. We would like to avoid that, but your client has already cost them 3 weeks at significant expense to them, and without any legal basis for doing so, a fact which Dorchester County can confirm.

For your reference, I'm attaching a copy of your client's deed, and the plat referenced therein. As you can see, the Wise Road ROW is publicly dedicated on that plat, and is clearly outside of your client's lot lines. He needs to remove his equipment from that public ROW, and stop interfering with my client's legally permitted work.

Please confirm for me by noon on Wednesday that your client will comply. Again, I am happy to answer any questions he may have but we need to wrap this up in the next few days or I'm afraid Horton will need to take other steps to protect its rights.

Thanks.

Tom

From: Harper, Thomas <Tom.Harper@wbd-us.com>
Sent: Thursday, August 22, 2024 7:58 AM
To: Landon Brock <lbrock@wiggerlawfirm.com>
Subject: RE: Elbadawy/D.R. Horton - Wise Road

Landon:

Yes, I just got what I needed from my client yesterday to respond to your request. Just to confirm, you're looking for all Horton's plans and specs and permits for this development? Or is your client just looking to see what's going to happen with Wise Road? We're happy to share it all. If Horton did not have the legal right to do this, including having all of its permits, Dorchester County would be stopping it, which it is of course not.

For now, I'm just attaching a copy of their plans & specs. I'm hoping it's not too large to get through to you, but we can upload to the cloud if needed. This shows exactly what Horton is building where, including Wise Road, but as you'll see, the plans have very little to do with Wise Road at all.

I'm assuming your client is primarily concerned about what's going to happen next to his property. As you can see on the plans, Horton is not tying its roads into Wise Road. It's installing water & sewer in the Wise Road right of way – as it is very clearly legally entitled to do, but let's not dwell on that unless we have to – but once those improvements are installed, that will be it for Wise Road as far as this

development is concerned. The Horton neighborhood isn't using Wise Road for vehicular or pedestrian access – traffic goes through other roads.

As to your inquiry about timing, Horton has been ready to start on sewer installation for 2 weeks but has been prevented from doing so by your client. The work should take about 3 weeks, assuming the weather cooperates. After the water and sewer installations are complete, Horton will grade the road back to its original state. Then it will be done with Wise Road. In the spring, after everything is built in the development, Dorchester County will come out and inspect the development, including the lines installed in the Wise Road ROW, and that should be the end of it. Home starts would follow, but that wouldn't have anything to do with Wise Road.

Again, as you can see on the plans, other than tying its water & sewer into the Wise Road right of way – which, as everyone including Dorchester County acknowledges, is not owned by your client and which Horton legally is entitled to do – Horton's development isn't connecting to Wise Road. Our owners won't be driving over it to get to their homes. Horton will install the water & sewer in the Wise Road ROW, restore that area to its prior condition, and then be done. Should take fewer than a handful of weeks and then it will be done and behind us.

Please let me know if you have any questions or would like other information.

Also, I do need to say that this needs to be resolved in the next couple of days or Horton is going to have to take steps to protect its rights here. I hope we don't have to get into all of that. I am happy to share a copy of your client's deed of his property, and the plat referenced in that deed, which clearly shows that your client does not own Wise Road, that it's outside of his property, and that Wise Road is a public ROW. As you probably already know but any real estate attorney can tell you, the county's failure to maintain that ROW area does not change that it belongs to the general public, including Horton, and that your client is not allowed to prevent Horton from using that area. Dorchester County owns the Wise Road ROW and it has approved Horton's plans to install water & sewer in that ROW, and Horton will need to take steps to ensure that right is no longer infringed.

Horton wants to be a good neighbor here and that's why it's happy to answer these questions. I will follow up with you tomorrow so that we can get this resolved and move forward. Thanks.

Tom

From: Landon Brock <lbrock@wiggerlawfirm.com>
Sent: Monday, August 19, 2024 4:15 PM
To: Harper, Thomas <Tom.Harper@wbd-us.com>
Subject: Re: Elbadawy/D.R. Horton - Wise Road

Thomas,

I have been in depositions today but appreciate you reaching out. Will you all be able to provide the requested information no later than close of business this coming Friday 8/23/24? If so, I will advise my clients of the extension.

Thanks,

Landon L. Brock
Associate Attorney

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DRH_000107

3/14/25, 12:03 PM

RE: Elbadawy/D.R. Horton - Wise Road - Onyx Hall - Outlook

I tried to give you a shout yesterday on this. We no longer represent Mr. Elbadawy. Give me a shout on my cell when you have a few if you like. (843) 872-8332.

Landon L. Brock
Associate Attorney
Wigger Law Firm, Inc.
100 S. Main St., Suite D
Summerville, SC 29483
☎ 843-851-9900
☎ 843-851-9044
lbrock@wiggerlawfirm.com

CONFIDENTIAL COMMUNICATION

Unless otherwise indicated or obvious from the nature of the preceding communication, the information contained therein is Attorney/Client privileged and confidential information/work product. The communication is intended for the use of the individual or entity to whom it was addressed. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail or facsimile and destroy any copies, whether electronic, paper, or otherwise, which you may have of this communication.

From: Harper, Thomas <Tom.Harper@wbd-us.com>
Sent: Tuesday, September 3, 2024 2:22 PM
To: Landon Brock <lbrock@wiggerlawfirm.com>
Subject: RE: Elbadawy/D.R. Horton - Wise Road

Landon: Can you let me know when your client will have removed his stuff blocking the right of way? It's still there as of this morning. I'm told that if it's not gone before this week is out, the contractors won't be able to move forward and, at that point, I am afraid my client is going to be looking to yours for compensation. I'd like to avoid that so let's please do what is needed for him to get out of there in the next couple of days. Thank you. Tom

From: Landon Brock <lbrock@wiggerlawfirm.com>
Sent: Friday, August 30, 2024 10:40 AM
To: Harper, Thomas <Tom.Harper@wbd-us.com>
Subject: RE: Elbadawy/D.R. Horton - Wise Road

Ok, great. I'll call you shortly.

Thanks,

Landon L. Brock
Associate Attorney
Wigger Law Firm, Inc.
100 S. Main St., Suite D
Summerville, SC 29483
☎ 843-851-9900
☎ 843-851-9044
lbrock@wiggerlawfirm.com

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CONFIDENTIAL COMMUNICATION

DATE 000104

EMAIL SENT TO JOHN FRAMPTON FROM THE PLAINTIFF

To: jframpton@dorchestercounty.net

Tue, Jun 24 at 12:45 PM

Dear Mr. Frampton,

I 'am writing to formally bring to your attention several serious concerns regarding Deputy Couty Attorney Bradley Mitchell's involvement in our ongoing civil case, Case # 2024-CP-1801459. Elbadawy V. D R Horton, Inc is currently pending in Dorchester County. Specifically, Multiple motions, including an Emergency Motion to Strike (06/23/2025) and Motion to Strike (06/16/2025) and a Notice of Appearance, were filed with the Clerk of Court but have not been entered on the public docket

We have reason to believe Mr. Mitchell may be exerting improper influence to suppress or delay these filings.

He has also refused to release FOIA- requested from the meeting on 11/14/2024, with Melissa Bates (taking notations), despite repeated requests, he is denying that there are any records. Whatever Mr. Mitchell is doing is very transparent; his lack of support for Dorchester County citizens is beyond the unthinkable of how a Dorchester County employee should be conducting himself.

He is clearly working outside the scope of Dorchester County and is helping D R Horton, Inc. As you are the supervising authority over the Dorchester County Attorney's office,

I'm respectfully request that you review Mr. Mitchell's suspicious actions and ensure that all court filings are handled lawfully and impartially, and confirm that no Dorchester County official is interfering with the judicial process.

Mr. Mitchell has also changed is answer on my private driveway, back in the 11/14/2024 sit-down Meeting at Summerville Town Hall, Mr. Mitchell assured us that Wise Lane was a private Road and then contacted my neighbor, Amanda Wise, to meet with him about Wise Lane. I have email conversations between me and my neighbor, and Mr. Mitchell discussing Wise Lane and he also admitted altering the County map to aid D R Horton, and then it was changed back to it's current status.

Then during the vrial hearing on 01/21/2025, he told Judge Matie Murphy it was a county road to support D. R. Horton's claim., This is untrue.

He also waited over 8 months to answer a Counterclaim, even though the deadline was 30 days, and now he has made himself a long trail of several recorded unethical traceable facts that cannot be ignored.

We are open to providing further documentation to prove evidence of misconduct, maybe schedule a sit-down meeting if necessary.

My goal is transparency, fairness, and upholding the integrity of the public process.

Sincerely,

Attia Elbadawy

493 Wise Road

Summerville, SC 29483

John Frampton

To: me

Tue, Jun 24 at 12:57 PM

Mr. Elbadawy,

It is my practice and custom not to respond to or engage in debate with parties to litigation who are not represented by a lawyer.

Should you engage a lawyer to represent you, I will be happy to discuss your concerns with him/her.

Sincerely,

John G. Frampton

FILED-55

2025 JUN 27 PM 2:14

CLERK OF COURT
DORCHESTER COUNTY

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SCDOT Customer Service Center - Request for Information and Services # 157810

From: cscts@scdot.org

To: ala_international@yahoo.com

Date: Monday, January 6, 2025 at 09:52 AM EST

Below you will find information regarding your recent Contact SCDOT Email received by the SCDOT Customer Service Center on 06-JAN-25.

?Dear Madam:

Thank you for contacting the South Carolina Department of Transportation's Customer Service Center. Unfortunately, the road you are inquiring about is not maintained by the SCDOT. You may contact Dorchester Public Works or Planning Office at (843-563-0070) to address your concerns.

[Subject] 493 Wise Lane

[County] Dorchester

[Message] Hi,

We are the owners on 2 lots on Wise Lane, 1 s this Road 493 Wise Lane, maintained by SC DOT?, thank you

Status: Completed on 06-JAN-25

If you have any questions regarding this email, please call the SCDOT Customer Service Center at 855-467-2368.

We value your feedback. Please take a moment to provide us with your comments by clicking the link below and completing the Customer Service Survey.

<http://www.scdot.org/scdotcontactusurvey/default.aspx?LogID=212643>

E5-11

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DORCHESTER COUNTY TREASURER
CHADY L. CHITTY
201 JOHNSTON ST. • SAINT GEORGE SC 29477-2412
500 NORTH MAIN ST. • SUMMERVILLE SC 29483
TEL: (843) 563-0165
Fax: (843) 563-0131

2024 REAL ESTATE TAX NOTICE

CHANGE OF ADDRESS

ELBADAWY ATTIA
493 WISE RD
SUMMERVILLE, SC 29483-9444



Mailing address changes should be submitted in writing and sent to the Assessor's office located at 201 Johnston St, St. George, SC 29477.

You may also submit your request online by visiting www.DorchesterCountySC.gov/addresschange.

Please note the address change requested will apply to the next tax year, not the current year.

TAX YEAR	NOTICE	PARCEL NO.	LOT/BLDG/ACRES	PRIOR YEAR TAX	CONTRIBUTION
2024	R-2024-10078499-00	142-04-00-019-001-C			
DESCRIPTION			200		
WISE RD 493			353.20		
			6%		
GOVERNMENT AGENCIES RESPONSIBLE FOR THE PROPERTY					
OF BILL	AMOUNT	PERCENTAGE	TAXES		
15.26%	County Operating	53.70	\$467.19		
2.43%	County Debt	8.60	\$74.82		
1.44%	County Library	5.10	\$44.37		
1.72%	County Capital Improvements	6.10	\$53.07		
2.8%	Children in Crisis	1.00	\$3.70		
5.0%	Senior Citizens Centers	1.80	\$15.56		
6.00%	County Fire	21.20	\$184.44		
50.56%	School Operating	178.50	\$1,553.82		
18.40%	School Debt	55.00	\$555.50		
2.54%	School Vocational	9.00	\$78.30		
8.7%	School Trident Tech	3.10	\$25.97		
100.00%	Sub-Total		\$3,072.84		
	Plus SWUF (Solid Waste User Fee)		\$95.00		
	Grand Total		\$3,167.84		
				PRIOR YEAR TAX	\$0.00
				INCLUDES TAXES AND FEES	
					TAX CALCULATION
				Assessed Value	8,700
				X Tax Rate	0.35320
				= Taxes before credits & fees	3,072.84
				- School Tax Credit	0.00
				- Homestead Exemption	0.00
				+ Fee Totals	85.00
				TOTAL AMOUNT DUE:	3,157.84
				DUE BY:	Jan 15, 2025

RETURN THIS STUB WITH PAYMENT

Pay Online www.dorchestercountytaxesonline.com • Pay by Credit Card Call 1-888-544-9434
There is a nominal fee charged for this service. If you pay online you WILL NOT be mailed a paid receipt. You can print it from the website.

NOTICE NUMBER	YEAR	PARCEL NO.	DESCRIPTION	DATE OF NOTICE	RATIO
R-2024-10078499-00	200	142-04-00-019-001-C		10/11/2024	6%

TOTAL DUE BY Jan 15, 2025

\$3,157.84

THEN PENALTIES APPLY:

If received after 1/15/25 (+3%)

\$3,252.58

If received after 2/3/25 (+10%)

\$3,473.63

If received 3/17/25 (+15%)

\$3,631.52

Must be paid in the Delinquent Tax Office, St. George.

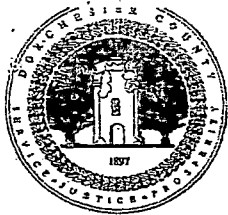
ELBADAWY ATTIA
493 WISE RD
SUMMERVILLE, SC 29483-9444

MAKE CHECK PAYABLE TO:
DORCHESTER COUNTY TREASURER
Please WRITE NOTICE NUMBER on check

DORCHESTER COUNTY REAL ESTATE TAX
PO BOX 834
ST GEORGE SC 29477-0834

Internet Tax Bill 1/14/2025

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Dorchester County Assessor
201 Johnston Street
St George, SC 29477
PHONE (843)563-0162 option #5
www.DorchesterCountySC.gov

THIS IS NOT A TAX BILL

PARCEL NUMBER	ACCOUNT NUMBER
142-04-00-019.000	R0024364

NOTICE OF VALUATION, CLASSIFICATION & ASSESSED VALUE

0006 0001618 Automated Presort



ELBADAWY ATTIA
6880 RIVERS AVE UNIT 2219
N CHARLESTON SC 29406-5029

FAIR MARKET VALUE
\$48,600
LIMITED/CAPPED VALUE
\$48,600
TAXABLE VALUE
48,600

0202016180

ADDRESS ON FILE: 444 ASHBURTON DR
GOOSE CREEK SC 29445-6646

TAX YEAR	TAX DISTRICT	DATE OF NOTICE	APPEAL DEADLINE DATE	SITES	ACRES
2019	209	08/09/2019	11/7/2019		2.43
REASONS FOR RECEIVING THIS NOTICE			LEGAL DESCRIPTION OF PROPERTY		
Transfer Of Property (ATI) NOV CHANGE			TWIN LAKES LOT: 05 Block: N WISE LN		

CLASSIFICATION - RATIO %	AGRICULTURAL USE VALUE	ASSESSED VALUE (Not the Tax Amount)
Other Land 6%		2,920
	The "Limited /Capped Value" cannot exceed 15% of the value from the prior tax year unless there has been an Assessable Transfer of Interest, Acreage Increase or New Construction. However, if the "Fair Market Value" is less than the "Limited/Capped Value," it is selected as the "Taxable Value."	TOTAL ASSESSED VALUE IS NOT THE TAX AMOUNT
		4% Legal Residence Applications may be found on the Assessor's Web Page at www.DorchesterCountySC.gov/Assessor

YOU MAY ELECT TO APPEAL YOUR REAL PROPERTY VALUE OR CLASSIFICATION.

PROTEST BY MAIL: If you choose to mail a written objection, you must provide the following information and mail this form to the Assessor. To preserve your right to protest, your written objection must be timely filed or postmarked by the "Appeal Deadline Date." Please attach a letter explaining the basis of your appeal.

Certified mailing is recommended. Please make a copy of both sides of this form for your records.

PROTEST IN PERSON: If you choose to present a written objection to the Assessor's Office, you must provide the following information and timely deliver it to the Assessor's Office by the "Appeal Deadline Date." Please attach a letter explaining the basis of your appeal. Please make a copy of both sides of this form for your records.

Please be aware that even if you protest the value, your property taxes still need to be paid by the due date to avoid penalties for the current tax year.

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OWNER'S OPINION OF MARKET VALUE (Please attach proof):	All deadlines for filing an objection or appeal must be met in order to preserve your right to appeal. Please review the backside of this form for detailed information on the appeal procedures.	
OWNER/AGENT SIGNATURE:	DATE:	BEST CONTACT TELEPHONE NUMBER:



APPROVAL TO OPERATE
Onsite Wastewater System

Permit ID: 18-2023-01-0006 v2.0
County: Dorchester

Name: ATTIA ELBADAWY
Type Facility: Residential
Subdivision:
Block: **Lot:**

Address: PINOPOLIS, SC
29469
Site: Wise Lane
Summerville, SC

Program Code:
System Code: 611 ENGINEERED SYS
<1500GPD PUMP
TM #: 142-04-00-019
Water Supply: Private Well

ACTUAL INSTALLATION

The Final Approval is issued upon the system certified "as built" plan of the actual installation, and other supporting documentation as required by this standard and supplied by the Consulting Engineer.

FINAL APPROVAL

Caleb Rodgers, PE

(Consulting Engineer)

SC #32006

(State & License Number)

01/04/2023

(Plan Date)

Tyler Sgro, PSC

(Soil Classifier)

4/17/2023

(As Built Plan)

The consulting engineer shall be responsible for supervising construction of the system and providing SCDHEC with a certified "as built" plan of the actual installation. Any Final Approval that is released pursuant to this Standard shall be based upon this engineering certification.

Comments:

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APPROVAL TO PLACE INTO OPERATION

THIS CERTIFICATE OF FINAL APPROVAL IN NO WAY GUARANTEES THE LIFE OF THE SYSTEM OR THAT IT WILL FUNCTION PROPERLY UNDER ANY OR ALL CONDITIONS. ANY PERMIT TO CONSTRUCT AND OPERATE THAT IS ISSUED PURSUANT TO THIS STANDARD SHALL BE BASED UPON THE CONSULTING ENGINEER'S DESIGN CERTIFICATION AND OTHER SUPPORT DOCUMENTATION.

Reviewed By:

Kevin Holland

Date: April 17, 2023

E5-5

Wise Rd TMS# 142-04-00-019

From: Wendy Creel (wcreel@dorchestercountysc.gov)

To: groomingstyle@yahoo.com

Cc: jilienthal@dorchestercountysc.gov

Date: Friday, July 22, 2022 at 09:44 AM EDT

Good morning,

Dorchester County Water and Sewer has completed our review and have determined that we do not have any sewer lines near this lot. Therefore, Sewer service is not available to your lot on Wise Rd, with TMS# 142-04-00-019.

You will need to contact DHEC regarding a septic system.

Thank you,

DCWS



Wendy Creel
Customer Service Supervisor

Dorchester County
235 Deming Way Summerville SC 29483
Office: 843 832 0075
Email: WCreel@dorchestercountysc.gov

f @ in v

53

E5-4

SC Code § 56-5-450 (2012) ○

Every way or place in private ownership and used for vehicular travel by the owner and those having express or implied permission from the owner but not by other persons is a "private road" or "driveway."

HISTORY: 1962 Code Section 46-253; 1952 Code Section 46-253; 1949 (46) 466.

54

E5-1

Att: Jason Carraher,, Wise Road, Summerville

From: Andy Garsea (ala_international@yahoo.com)

To: PublicWorks@DorchesterCountySC.gov

Date: Wednesday, April 24, 2019 at 11:11 PM EDT

Dear Jason Carraher,

Hello, We are the owners of two lots (trns# 142-04-00-018 and 142-04-00-019) on Wise Road,, Summerville. SC 29843

We are writing you to deal with the service of getting the roadway prepared

"equipped" for use of a home permit on the 2 lots,that I'm paying taxes on.

We have tried to fix the roadway on are own, wasting alot of money and time,

because we have tried to deal with the people in your office,and have gonna nowhere

Never giving a real reason,why this roadway is not equipped by Dorchester County

The condition of the road remain very messy,muddy (3 to 4 feet of mud) ,cars will

get suck in the mud, all because I was told that it is not in the county problem

(Dorchester County), which is not the truth, and we feel that we have been lied to as

well as discriminated against. This needs to end, we are tax payers and are rights

that are not being addressed. We need this matter taken care of and not be given the

run around, we trust that you will get to the bottom of this issue and solve it.

Thank you for your time

We appreciate your professionalism in clearing up this issue quickly,so that we

can move forward in making are home in Dorchester County.

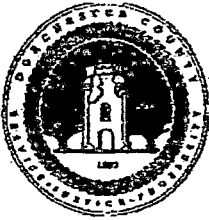
Thank you

Attia Elbadawy & Lynne Chatlos

email: ala_international@yahoo.com

We can be reached at 843-412-8026 or 843-641-8556

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Dorchester County Assessor
201 Johnston Street
St George, SC 29477
PHONE (843)563-0162 option #5
www.DorchesterCountySC.gov

THIS IS NOT A TAX BILL

PARCEL NUMBER	ACCOUNT NUMBER
142-04-00-019.000	R0024364

NOTICE OF VALUATION, CLASSIFICATION & ASSESSED VALUE

0006 0001618 Automated Presort
ELBADAWY ATTIA
6860 RIVERS AVE UNIT 2219
N CHARLESTON SC 29406-5029

FAIR MARKET VALUE
\$48,600
LIMITED/CAPPED VALUE
\$48,600
TAXABLE VALUE
48,600

ADDRESS ON FILE: 444 ASHBURTON DR.
GOOSE CREEK SC 29445-6646

TAX YEAR	TAX DISTRICT	DATE OF NOTICE	APPEAL DEADLINE DATE	SITES	ACRES
2019	209	08/09/2019	11/7/2019		2.43
REASONS FOR RECEIVING THIS NOTICE			LEGAL DESCRIPTION OF PROPERTY		
Transfer Of Property (ATI) NOV CHANGE			TWIN LAKES LOT: 05 Block: N WISE LN ✓		

CLASSIFICATION - RATIO %	AGRICULTURAL USE VALUE	ASSESSED VALUE (Not the Tax Amount)
Other Land 6%		2,920
	The "Limited /Capped Value" cannot exceed 15% of the value from the prior tax year unless there has been an Assessable Transfer of Interest, Acreage Increase or New Construction. However, if the "Fair Market Value" is less than the "Limited/Capped Value," it is selected as the "Taxable Value."	TOTAL ASSESSED VALUE IS NOT THE TAX AMOUNT
		4% Legal Residence Applications may be found on the Assessor's Web Page at www.DorchesterCountySC.gov/Assessor

YOU MAY ELECT TO APPEAL YOUR REAL PROPERTY VALUE OR CLASSIFICATION.

PROTEST BY MAIL: If you choose to mail a written objection, you must provide the following information and mail this form to the Assessor. To preserve your right to protest, your written objection must be timely filed or postmarked by the "Appeal Deadline Date." Please attach a letter explaining the basis of your appeal. Certified mailing is recommended. Please make a copy of both sides of this form for your records.

PROTEST IN PERSON: If you choose to present a written objection to the Assessor's Office, you must provide the following information and timely deliver it to the Assessor's Office by the "Appeal Deadline Date." Please attach a letter explaining the basis of your appeal. Please make a copy of both sides of this form for your records.

Please be aware that even if you protest the value, your property taxes still need to be paid by the due date to avoid penalties for the current tax year.

OWNER'S OPINION OF MARKET VALUE (Please attach proof):		All deadlines for filing an objection or appeal must be met in order to preserve your right to appeal. Please review the backside of this form for detailed information on the appeal procedures.	
OWNER/AGENT SIGNATURE:		DATE:	BEST CONTACT TELEPHONE NUMBER:

2019
E3
15

DORCHESTER COUNTY S.C.
DATE PRINTED: 1/08/2019 REAL ESTATE

ACCOUNT NUMBER
R-2018-00024363-00 LEVY-YR: 2018

MAP # 142-04-00-018-000C

Total Tax 682.89

DIST.	APPRaisal VALUE	ASSESSed VALUE	MILLAGE
209	33,800	2,030	336.40

Current Owner

KLEADAMY ATTIA

444 ASHBURTON DR

GOOSE CREEK

SC 29445 6646

Jan 15, 2019 682.89

Jan 16 - Feb 1, 2019 703.38

Feb 2 - Mar 18, 2019 751.18

After Mar 18 Delinquent notice will be
mail with correct amount

PLEASE DETACH AND RETURN THIS PORTION WITH PAYMENT

IMPORTANT-MAIL

TREASURER'S COPY WITH FULL PAYMENT
MADE PAYABLE TO:

DORCHESTER COUNTY TREASURER
201 JOHNSTON STREET
ST GEORGE, SC 29477

Total Tax 682.89

DEAR TAXPAYER:

This tax notice describes the taxes on this said property for this tax year. The County Assessor's records show changes in the past year either: ownership, acres, assessment or etc. Please check the tax ratio on this notice. If you are the owner/occupant of this property, you may qualify for the Legal Residence Ratio of 4% rather than the 6% ratio, which will save you money. The county assessor is responsible for making these changes. Please call the assessor at 832-0162 or (843)563-0162 for these changes.

Homestead Exemption is an additional reduction for those who own and occupy their property, are over 65 and/or 100% totally and permanently disabled, please call the county auditors office at 832-0118 or (843)563-0118 to apply for Homestead Exemption.

Previous owner: FERRY OLSE HODGES
Purchased: 04-30-2018

Jan 15, 2019 682.89

Jan 16 - Feb 1, 2019 703.38

Feb 2 - Mar 18, 2019 751.18

After Mar 18 Delinquent notice will be
mail with correct amount

REAL ESTATE

ACCOUNT NUMBER
R-2018-00024363-00 LEVY-YR: 2018

MAP # 142-04-00-018-000C

	RATIO	LAND-APPR	BLDG-APPR
OTHER	.060	33,800	0

Total Appr: 33,800 Land Appr: 33,800 Bldg Appr: 0

Total Acres: 1.00

Location: WISE LN

019 2.43 acres

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TAX PRORATION AGREEMENT

RE: File #: 18-067 (Elbadawy)

Seller(s): Olah H. Perry

Purchaser: Atia Elbadawy

Property Address: 0 Wise Lane
Dorchester, SC 29483

The undersigned Purchaser(s) and Seller of the above referenced property acknowledge that they have been advised that the tax rolls may carry said property within a larger tract of land and/or as unimproved or partially improved property.

IF THE COUNTY PROPERTY TAXES ARE DUE AND PAYABLE AT THE TIME WHEN THE CLOSING OF THIS TRANSACTION TAKES PLACE, THEY WILL BE PRO-RATED BETWEEN THE PARTIES AND PAID TO THE COUNTY TREASURER AS PART OF THE CLOSING.

IF THE CURRENT YEAR'S TAXES ARE NOT YET DUE AT THE TIME OF CLOSING THEN THE PURCHASER WILL BE RESPONSIBLE FOR PAYMENT OF THOSE TAXES AND USER FEES WHEN THEY DO BECOME DUE. The county usually sends the tax bills out in September or early October. At the time of closing the purchaser received a credit for the seller's pro-rata share of the estimated taxes and user fees expected to be due for this year. This pro-ration is determined as of the date of closing and is based on the best available information. Should it be discovered, when the actual bill for such taxes and user fees is received, that the seller has not been charged his accurate pro-rata share thereof, the seller hereby agrees to promptly reimburse the difference to the purchaser. Likewise, if it is discovered that the purchaser received a larger credit, at the time of closing, than to which he was entitled, the purchaser agrees to promptly reimburse such difference to the seller. If this year's tax bill is sent to the seller, the seller agrees to promptly forward the same to the purchaser. If the purchaser has established an escrow account for taxes and/or insurance with his or her lender, then the lender will pay the taxes out of that account when they become due.

If no adjustment in taxes owed by Seller is made prior to December 31st of the year of closing, then the figures used at closing will be presumed to be the true amount due by Seller and both parties will be bound thereby.

IN THE EVENT THE PURCHASER HAS NOT RECEIVED A TAX BILL BY DECEMBER 1, S/HE SHOULD CONTACT THE COUNTY TREASURER'S OFFICE AND REQUEST A DUPLICATE TAX BILL. A SUBSTANTIAL PENALTY WILL ACCRUE ON TAX PAYMENTS MADE AFTER JANUARY 15.

If the property purchased in this transaction is to be used as purchaser's primary residence, purchaser should contact the County Tax Assessor's Office, in order to apply for an owner-occupied (qualified residence) assessment rate of four (4%) percent rather than the six (6%) percent assessment charged on second homes and investment properties. It may be

E3
16

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Dorchester
COUNTY

PLANNING & ZONING

KIERA REINERTSEN
Director

*** RESIDENTIAL USE ***

February 17, 2023

Attia Elbadawy
6880 Rivers Ave, Unit 2219
North Charleston, SC 29406

Dear Elbadawy:

Please accept this letter as verification of the address assigned to your property known as Lot 5, Blk N in Twin Lakes with access off Wise Lane, Summerville, SC.

493 Wise Lane
Summerville, SC 29483
TMS# 142-04-00-019.000

Address numbers are very important for location of your property in the event of an emergency; therefore, we need you to properly post your address numbers where they can be seen in all types of weather.

Dorchester County Ordinance 04-13 requires that numbers be in a color that contrasts with the background on which they are displayed. The numbers must be at least 4 (four) inches in height for residential use. The numbers are to be placed on residential structures within twenty (20) days of receiving this letter.

The street address must also be placed on your mailbox to receive mail. If you presently use a PO Box your street address is the physical location of your residence or business, and requires the numbers be placed on your home or business also. The owner / resident is responsible for the cost of displaying the address and for notifying agencies and individuals of this new address.

If you need further assistance, please contact the E 9-1-1 Addressing office at (843) 832-0029 or (843) 563-0029.

Sincerely,

Tiffany B. Heber
Tiffany B. Heber
Land Surveying Tech

**Recreational vehicles, travel trailers (campers) or motorized homes licensed for travel on highways shall not be construed as manufactured (or mobile) homes for the purpose of providing permanent occupancy for human habitation.*

DorchesterCountySC.gov

500 North Main Street • Box 3 • Summerville • South Carolina • 29483

E3
1

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E6-19

DORCHESTER COUNTY PLANNING DEPARTMENT
P.O. Box 2220
SUMMERVILLE, SC 29484
(803) 821-0391

In cooperation with the U.S. Postal Service

DATE: July 23, 1990

**OFFICIAL NOTIFICATION OF NEW HOUSE NUMBER: 502 Hisc Ln.
Summerville, SC 29484**

As a part of Dorchester County's effort to improve the quality of service to our citizens, Ordinance 89-04 has been adopted which established a uniform system of house/building numbering and street addressing. This action is necessary for the establishment of the "911" centralized dispatching, which will reduce the time required for police, fire and EMS assistance to reach you during an emergency. This system will also improve delivery of mail and the location of your home or building by other visitors.

A new house/building address number has been assigned to your property, and is listed at the top of this Notice. Ordinance 89-04 requires that you display this address number on your house/building. All numbers must be shown in a color which has a contrasting color to the background wall or object on which the number is displayed. For example, a dark colored number should be used on a building wall which is painted a light color. For a residence, the house number must be at least 3 inches in height. For a business, the building number must be at least 4 inches in height. The numbers must be displayed so that the number is clearly and easily visible from the street. Whenever any building is located more than 50 feet from the street, the address number must be placed near the sidewalk, driveway or other common entrance to the property, such as a mailbox, if it is located on that property.

The owner or agent for the property is responsible for the cost of displaying the address numbers and to notify the U.S. Post Office, utility companies and other agencies and individuals with whom they correspond, of this change in address.

We hope that you will give your complete cooperation to this important project as it is vital to your well being, safety, and protection. If you need any further assistance in this matter, please contact the Planning Department's Street Address Office.

Sincerely,

Adena Harper

Adena Harper
Staff Planner/Street Address Coordinator

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DORCHESTER COUNTY ADDRESS NOTIFICATION FORM

NAME OF RESIDENT/OWNER Marcia Wise

ADDRESS ASSIGNED 502 Wise Lane Lane

OLD ADDRESS (if applicable) _____

CITY Summerville ZIP CODE 29483 TMS# 142-04-08-022

LOCATION: Private road off Weir Road located in Twin Lakes S/D

PHONE #: _____ WILL RECEIVE STREET DELIVERY Yes

ASSIGNED BY Adena Barber

DATE RECEIVED 7/90 DATE ASSIGNED 7/90

201-0391

For information concerning this form call ~~563-5197~~ or 563-5197.

DORCHESTER COUNTY PLANNING DEPARTMENT

White - File copy • Yellow - Post Office • Pink - Tax Assessor • Gold - Resident

Elc-20

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DORCHESTER COUNTY PLANNING DEPARTMENT

POST OFFICE BOX 416
ST. GEORGE, S.C. 29477
TELEPHONE: 563-2331 or 821-1624
EXTENSIONS: 152 or 197

E6-21

September 29, 1987

Ms. Marcia H. Wise
1450 Ft. Johnson Road
Charleston, S.C. 29412

Dear Ms. Wiser:

This letter is to inform you that on Thursday, September 16, 1987, the Dorchester County Planning Board Street Naming Committee voted unanimously to name a unnamed road. The road is a small dirt road that is connected to Weir Road located in Twin Lakes Subdivision. The name shall be Wise Lane and the number range shall be 500-515, numbering East to West. Enclosed please find a location map with the street highlighted in yellow.

I hope this notification pleases you and your family. Thank you for your time and cooperation.

Sincerely,

M. Carol Thomason

Carol Thomason
Dorchester County
Planning Department

Enclosures
cc. Ms. Joyce Poole, Southern Bell

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EXHIBIT D

EXHIBIT C

Supersedeas Authority – Status Quo Pending Appeal

A writ of supersedeas is designed to maintain the status quo pending appeal and divests the trial court of jurisdiction over the matters on appeal. Any further trial court action on those matters is barred.

Points and Authorities

Rule 241, South Carolina Appellate Court Rules (SCACR)

Provides that the filing of a supersedeas stays proceedings in the trial court on the matters involved in the appeal.

Ex parte Bowers, 275 S.C. 361 (1980)

Held that a supersedeas maintains the status quo pending appeal and bars further trial court action.

State v. Harris, 268 S.C. 117 (1977)

Confirmed that once an appeal is perfected, the trial court lacks jurisdiction and all subsequent proceedings are void.

Due Process – Mathews v. Eldridge, 424 U.S. 319 (1976)

Due process requires a meaningful opportunity to be heard. Forcing hearings during a supersedeas stay undermines this principle.

Abuse of Process – Huggins v. Winn-Dixie Greenville, Inc., 252 S.C. 353 (1969)

Misusing court procedure to advance an improper purpose constitutes abuse of process. Proceeding despite a supersedeas fits this category.

Conclusion

The law is clear: a supersedeas halts all trial court proceedings on the appealed matters. By scheduling and hearing motions after the supersedeas was filed, the Dorchester County trial court is acting outside its jurisdiction, in violation of Rule 241, SCACR, and established case law.

FILED-REC.

E5-15

2025 JUN 12 PM 12:19 		PERMIT TO CONSTRUCT Onsite Wastewater System		File Nbr: 2023-01-0006 County: Dorchester				
Name: CHERYL CRAWFORD Type Facility: Mobile Home (4 BR) Subdivision: Block: Lot: TM#: 142-04-00-019-000		Address: c/o CPR Engineering Solutions, LLC PO Box 67 Forestville, SC 29469 Site: Wise Lane Summerville, SC		Program Code: 362 System Code: 611 Water Supply: Private				
PERMIT TO CONSTRUCT SYSTEM SPECIFICATIONS See engineered system design and supporting documentation.								
SPECIAL INSTRUCTIONS/CONDITIONS THIS PERMIT IS SITE SPECIFIC. ANY CHANGES TO THE SYSTEM MUST BE APPROVED BY DHEC. ALTERNATIVE TRENCH PRODUCTS APPROVED UNDER STATE RULES AND REGULATIONS MAY BE SUBSTITUTED. ANY UNAPPROVED CHANGES WILL VOID THIS PERMIT. This Permit To Construct and Operate is issued pursuant to the SCODHEC Specialized Onsite Wastewater Systems for Peak Flows less than 1500 GPD. Issuance of this Specialized Onsite Wastewater System Permit To Construct does not relinquish the property owner of responsibility in attaining any and all necessary approvals or permits required to develop this property.								
PERMIT TO CONSTRUCT The Permit To Construct is issued upon the system design, certification, and other supporting documentation as required by this standard and supplied by: <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;"> CPR Engineering Solutions, LLC (Engineering Company) Caleb P. Rodger (Consulting Engineer) PE SC # 32006 (State and License Number) </td> <td style="width: 50%; text-align: center;"> Tyler Sgro (Soil Classifier) PSC SC # 119 (State and License Number) </td> </tr> </table> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; text-align: center;"> 01/04/2023 (Plan Date) </td> <td style="width: 50%; text-align: center;"> 22-577 (Project Number) </td> </tr> </table> Any Permit To Construct and Operate that is issued pursuant to this Standard shall be based upon the consulting engineer's design, certification, and other supporting documentation.					CPR Engineering Solutions, LLC (Engineering Company) Caleb P. Rodger (Consulting Engineer) PE SC # 32006 (State and License Number)	Tyler Sgro (Soil Classifier) PSC SC # 119 (State and License Number)	01/04/2023 (Plan Date)	22-577 (Project Number)
CPR Engineering Solutions, LLC (Engineering Company) Caleb P. Rodger (Consulting Engineer) PE SC # 32006 (State and License Number)	Tyler Sgro (Soil Classifier) PSC SC # 119 (State and License Number)							
01/04/2023 (Plan Date)	22-577 (Project Number)							
Reviewed By: <u>Natalie Kirkpatrick</u> DHEC 1781 (01/2014) This Permit will Expire and Become Null and Void Five (5) Years from the Issuance Date.		Date: <u>01/10/2023</u> This Permit is Appealable Under the Administrative Procedures Act. There may be an Additional Fee for Changes in this Permit that Require a Site Reevaluation.						

ABOVE GROUND SEPTIC PERMIT FROM DHEC; NO EXISTING SEWERAGE @ S.D.C. PUBLIC WORKS CLAIMS.

Quiet Title Default & Dorchester Countys Officer & Agents Roles in Corruption

In the ongoing litigation over Wise Lane, the record clearly shows that D.R. Horton, Dorchester County Lawyer Bradley Mitchell and County Administrator Jason Ward were each properly served with the Quiet Title Action Complaint. None of them filed an answer within the statutory 30-day deadline. These failures to respond constitute defaults, meaning there is no lawful claim or challenge on record to the Appellants/Plaintiffs' ownership of Wise Lane.

Despite this, Dorchester County Attorney Bradley Mitchell has actively participated in efforts to undermine the Appellants/Plaintiffs' rights by enabling unlawful actions outside the judicial process. Most notably, on or about August 8, 2025, the Dorchester County GIS map for "Roads by Maintenance with Contact" was altered to reclassify Wise Lane from private (gray) to county-owned (blue) — during active litigation. This change is unsupported by any court order, violates established legal process, and was made in direct contradiction to the unresolved Quiet Title action. Case No: 2025-1801527

Such conduct constitutes abuse of authority, interference with judicial proceedings, and potential criminal acts under South Carolina law. Bradley Mitchell's actions represent a clear pattern of corruption designed to circumvent the courts and deprive the plaintiffs of their property rights without due process.

The plaintiffs request that all reviewing authorities recognize the significance of these defaults in the Quiet Title action, investigate the unlawful map change, and hold Bradley Mitchell fully accountable.

MAP
1

WISE LAWE
IN GRAY, ORIGINAL STATUS

WISE
ROAD

WIRST

CENTRAL AVE

Layer List

Layers

Subdivisions

Parcels with PUBLIC INFO

USA_Flood_Hazard FEMA

DFIRM circa 2018 not live

Tax Grid

Address

Parcels with Public data

Parcels Only Live

County Zoning

Roads with Address Range

✓ Roads by Maintenance with contact

Town Zoning

County Council Districts

Municipal Boundaries

Find address or TMS

Show search results for 49%

MAP #2

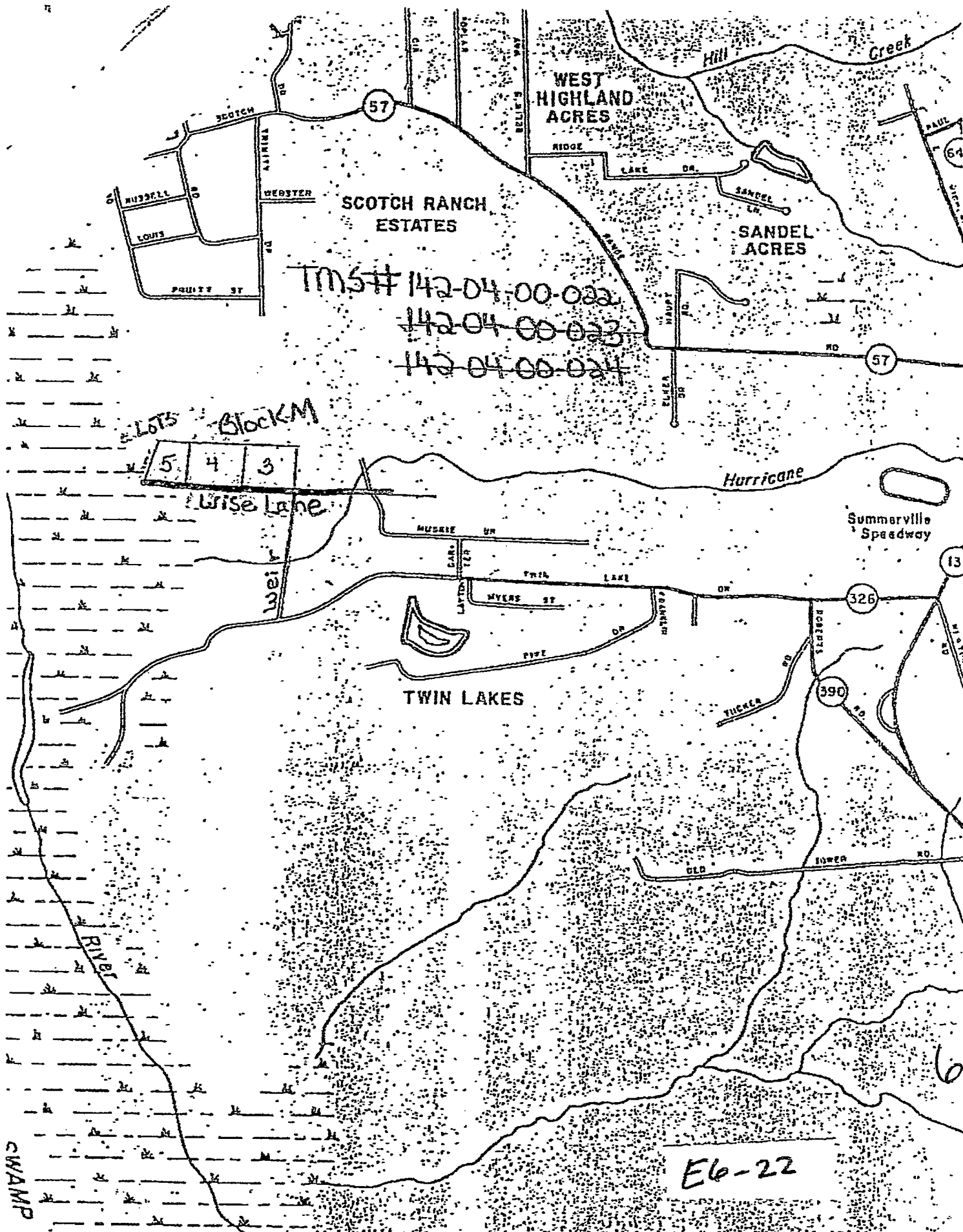
WISE LANE
IS NOW
IN Blue

WISE
LANE

WISE
ROAD

7
WALK

DORCHESTER County
ILLEGALLY CHANGED
the STATUS.



Wise Lane
Wise Rd
the Plaintiff House

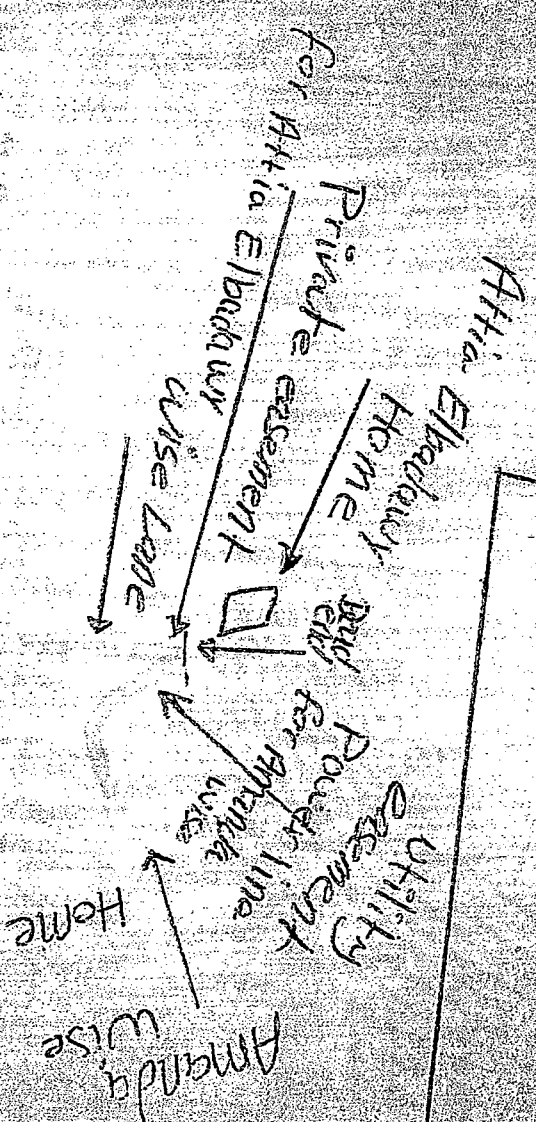
On the County
MAP Wise Lane
Private Rd

FILED-REC'D
2025 SEP 11 PM 1:53
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

2025 SEP 11 PM 2:05
CERTIFIED COPY
CLERK OF COURT
DORCHESTER COUNTY

old
69

Dor Horton
(HQA) subdivided



Wise St

Wise Rd

the Plaintiff Lot #3 and Lot #6
merged together
so the easement
Between Lot #5
and Lot #6

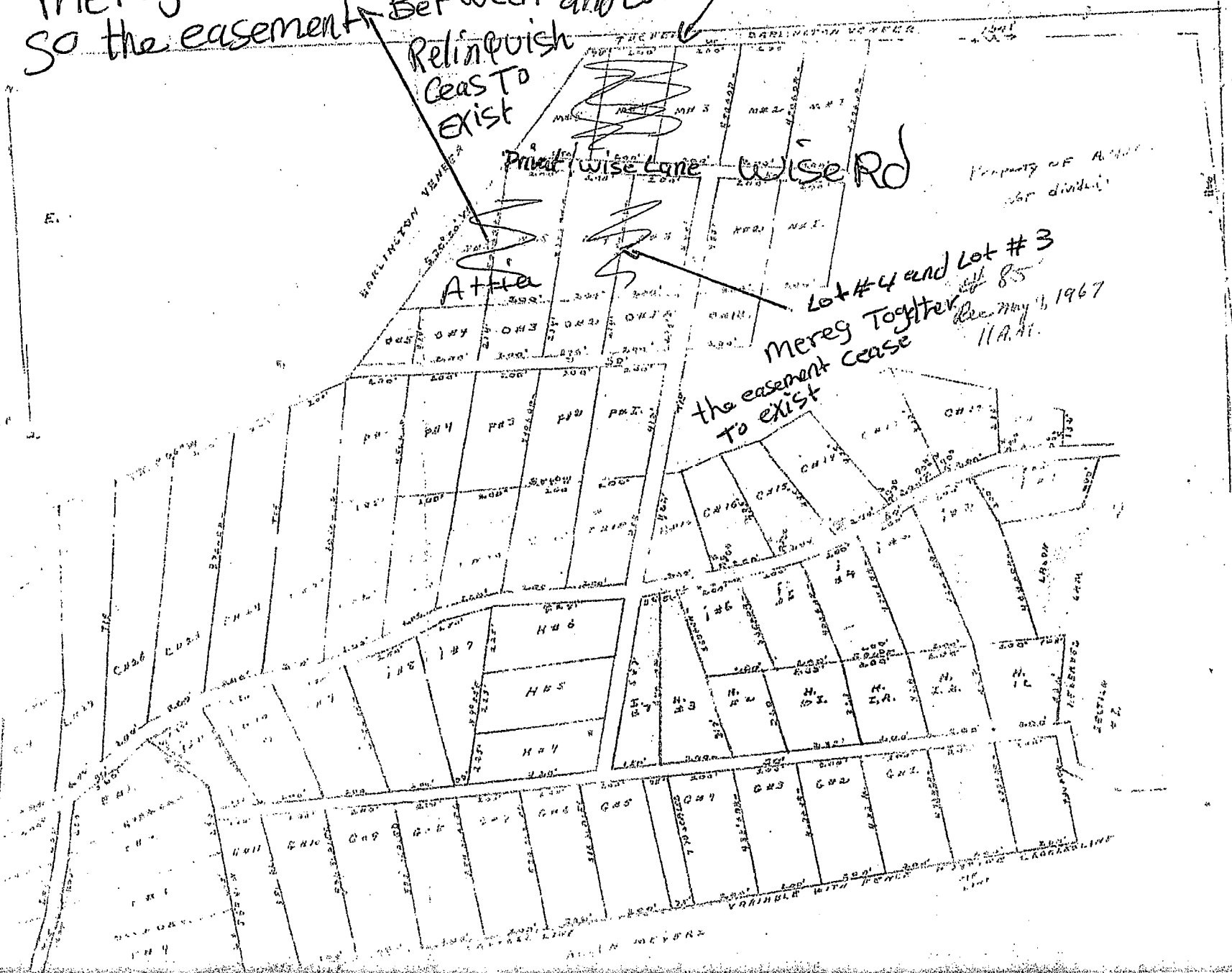
Lot #3 and Lot #4 and Lot #5
merged together the easement
cease to exist.

Relinquish
Cease to
Exist

Private Lane Wise Rd

Lot #4 and Lot #3
merged together
the easement cease
to exist
Dec. May 1967
H.A.T.

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Lot #3, #4, & 5
under one owner
so the easement
cease to exist

