

**RECEIVED**

**Dec 03 2025**

**IN THE SOUTH CAROLINA COURT OF APPEALS**

**SC Court of Appeals**

**Appellate Case No. 2025-001299**

**Attia Elbadawy and Lynne Chatlos, Appellants**

**v.**

**D.R. Horton, Inc., Respondents  
AND  
Dorchester County, Respondents**

**MOTION TO PRESERVE AND CORRECT THE RECORD**

**PURSUANT TO RULE 240 AND RULE 210(h), SCACR**

---

COMES NOW the Appellants, Attia Elbadawy and Lynne Chatlos, appearing pro se, and respectfully submit this Motion pursuant to Rule 240, SCACR, and Rule 210(h), SCACR. Appellants sincerely appreciate the Court's notice of deficiency and apologize for any misunderstanding regarding the proper filing procedure.

Appellants are grateful for the opportunity to correct and properly present this matter.

**I. BASIS FOR THIS MOTION**

Appellants previously filed a notice explaining that certain filings from the lower court appear to be missing, truncated, or altered. Appellants retain stamped copies of the documents as originally filed. Because the completeness of the appellate record is record pursuant to Rule 210(h), SCACR.

## **II. REQUESTED RELIEF (Within the Court's Authority)**

Appellants respectfully request that the Court:

1. Accept this Motion as curing the deficiency noted by the Clerk;  

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2. Preserve the issues concerning potential omissions in the record;
3. Direct the Clerk of Court for Dorchester County to certify a complete, accurate record.
4. Permit Appellants to submit stamped copies of missing filings for reconstruction under Rule 210(h);
5. Grant any further relief the Court deems appropriate within its appellate jurisdiction.

## **III. APPELLANTS' GOOD-FAITH INTENT**

This Motion is submitted respectfully and solely for the purpose of ensuring that the appellate record reflects the filings as originally accepted by the lower court.

Appellants do not seek sanctions, investigations, or any relief outside the Courts jurisdiction.

Respectfully submitted,

Attia Elbadawy

and Lynne Chatlos

493 Wise Road

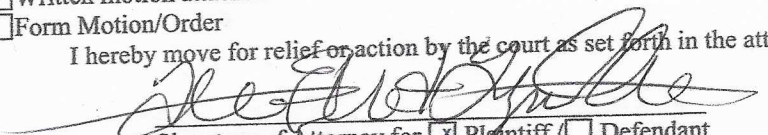
Summerville, SC 29483

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF DORCHESTER )

IN THE COURT OF COMMON PLEAS  
JUDICIAL CIRCUIT

CASE NO.: 2024 -CP- 1801459

ATTIA ELBADAWY AND LYNE CHATLOS  
Plaintiff, )  
 )  
vs. )  
 )  
1) Dorchester County )  
2) D R Horton, Inc )  
Defendant. )

Plaintiff's Attorney: <b>PRO SE</b> , Bar No. _____ Address: <u>493 WISE ROAD, SUMMERVILLE, SC 29483</u> Phone: <u>843-641-8556</u> Fax _____ E-mail: <u>ala_international@yahoo.com</u> Other: _____	Defendant's Attorney: <u>1) KENISON, DUDLEY &amp; CRAWFORD</u> <u>1) Dorchester County</u> , Bar No. _____ Address: <u>10201 Johnston Street, St. George SC 29477</u> <u>2) 325 W McBee Avenue, Suite #301, Greenville, SC 29601</u> Phone: <u>1) 843-563-0103</u> Fax _____ E-mail: <u>2) 864-242-4899</u> Other: _____										
<input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)											
<b>SECTION I: Hearing Information</b> EMERGENCY MOTION TO INVESTIGATE <b>MISSING PLAINTIFFS EXHIBIT#5 &amp; IMPROPER ACTION OF WRIT OF SUPERSEDEAS</b> Nature of Motion: _____ Estimated Time Needed: <u>15 MINUTES</u> Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO											
<b>SECTION II: Motion/Order Type</b> <input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.  Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant Date submitted <u>NOVEMBER 17, 2025</u>											
<b>SECTION III: Motion Fee</b> <input checked="" type="checkbox"/> PAID - AMOUNT: \$ 25.00 <input type="checkbox"/> EXEMPT: (check reason) <table border="0"> <tr> <td><input type="checkbox"/> Rule to Show Cause in Child or Spousal Support</td> <td><input type="checkbox"/> State Agency v. Indigent Party</td> </tr> <tr> <td><input type="checkbox"/> Domestic Abuse or Abuse and Neglect</td> <td><input type="checkbox"/> Post-Conviction Relief</td> </tr> <tr> <td><input type="checkbox"/> Indigent Status</td> <td><input type="checkbox"/> Motion for Stay in Bankruptcy</td> </tr> <tr> <td><input type="checkbox"/> Sexually Violent Predator Act</td> <td><input type="checkbox"/> Motion for Execution (Rule 69, SCRCPP)</td> </tr> <tr> <td><input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions</td> <td></td> </tr> </table> Name of Court Reporter: _____ <input type="checkbox"/> Other: _____		<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party	<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief	<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Stay in Bankruptcy	<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Execution (Rule 69, SCRCPP)	<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input type="checkbox"/> State Agency v. Indigent Party										
<input type="checkbox"/> Domestic Abuse or Abuse and Neglect	<input type="checkbox"/> Post-Conviction Relief										
<input type="checkbox"/> Indigent Status	<input type="checkbox"/> Motion for Stay in Bankruptcy										
<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Motion for Execution (Rule 69, SCRCPP)										
<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions											
<b>JUDGE'S SECTION</b> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____, 20 <u>25</u>										
<b>CLERK'S VERIFICATION</b> Collected by: _____ Date Filed: _____, 20 <u>25</u> <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____											

**SOUTH CAROLINA  
DORCHESTER COUNTY  
COURT OF APPEALS**

**COURT OF COMMON PLEAS**

**CASE No: 2024-CP-1801459**

**CASE No: 2025-001299**

Attia Elbadawy and Lynne Chatlos  
Plaintiffs,  
V  
D R Horton, Inc  
Defendants

---

D R Horton, Inc  
Third Party Plaintiffs  
V  
Dorchester County  
Third Party Defendants

**EMERGENCY MOTION TO  
INVESTIGATE  
MISSING PLAINTIFFS  
EXHIBIT # 5 AND  
IMPROPER ACTION ON  
WRIT OF SUPERSEDEAS**

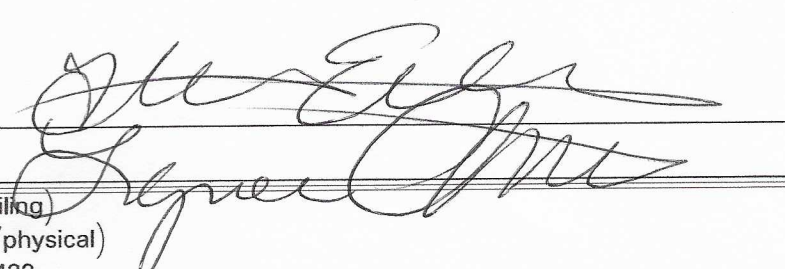
D R Horton, Inc  
Mark Bible  
325 W McBee Avenue  
Suite#301  
Greenville, SC 29601

Dorchester County  
Attorneys Office Bradley Mitchell  
201 Johnston Street  
St. George, SC 29477

Attia Elbadawy \_\_\_\_\_

Lynne Chatlos \_\_\_\_\_

493 Wise Road (mailing)  
493 Wise Lane (911/physical)  
Summerville, SC 29483  
843-641-8556  
ala\_international@yahoo.com  
November 17, 2025



SOUTH CAROLINA  
DORCHESTER COUNTY

COURT OF COMMON PLEAS  
CASE No: 2024-CP-1801459  
COA CASE No:2025-001299

**EMERGENCY MOTION TO INVESTIGATE MISSING PLAINTIFF EXHIBIT 5 AND  
IMPROPER ACTION ON WRIT OF SUPERSEDEAS**

COME NOW Plaintiffs **Attia Elbadawy** and **Lynne Chatlos** ("Plaintiffs"), pro se, and respectfully move this Honorable Court for an emergency investigation into the disappearance and destruction of Plaintiffs' Exhibit 5, filed on **January 17, 2025**, and for an order declaring void any rulings or denials issued by Judge **Mattie Murphy** on or after **November 2, 2025**, in violation of appellate jurisdiction.

**I. BACKGROUND AND PROCEDURAL HISTORY**

On **August 13, 2025**, the South Carolina Court of Appeals issued an order directing the Dorchester County Circuit Court to review and return Plaintiffs' exhibits so that Plaintiffs could exercise due process and forward their review to the Court of Appeals for completion of the Writ of Supersedeas (See Exhibit A). On **November 2, 2025**, Honorable Judge **Mattie Murphy**, through an email sent by **Cheyenne Herlawkirk**, informed Plaintiffs that she never saw Exhibit 4 (filed December 30, 2024) or Exhibit 5 (filed January 10, 2025). Judge **Murphy** then instructed Defendant **D.R. Horton, Inc.** to draft the Writ of Supersedeas on her behalf and to "review" Plaintiffs' exhibits, contrary to the Court of Appeals' directive that such review be performed by the Judge herself and shared with the Plaintiffs for their...

**II. STATEMENT OF FACTS**

1. On **January 17, 2025**, at approximately **2:30 p.m.**, Plaintiffs filed Exhibit 5 (approximately 150 pages) with the Dorchester County Clerk of Court. The filing was time-stamped and accepted approximately two hours before **D.R. Horton** filed its own exhibit package at **4:45 p.m.** on the same day.
2. When reviewing the court docket in November 2025, Plaintiffs discovered that Exhibit 5 was missing entirely from the public docket and was never entered into evidence. Plaintiffs immediately visited the Clerk's Office on **November 14, 2025**, where **Rosa Lee** and her assistant confirmed that Exhibit 5 could not be found in the system.
3. After 30 minutes of searching, the clerks located a remnant of Exhibit 5 "hiding behind" the Certificate of Service for the same filing date, showing only eight pages—printed double-sided, equating to four sheets—out of the full 150-page filing.
4. The missing pages were neither restored nor explained, and no copy was provided to Judge **Murphy** for her review as directed by the Court of Appeals.
5. On **November 2, 2025**, while still purporting to review the Writ of Supersedeas, Judge **Murphy** denied three separate motions filed by Plaintiffs. Because the Court of Appeals had already assumed jurisdiction, those actions were outside her authority and therefore **null and void**.

### III. LEGAL BASIS

A. Under **Rule 210(h), SCACR**, the record on appeal must include all materials necessary for review, and the appellate court may direct supplementation or correction.

B. Under **Rule 60(b)(4), SCRPC**, an order entered without jurisdiction is void and of no effect. Once appellate jurisdiction attached, the lower court was without power to deny motions or alter the appellate record.

C. **S.C. Code § 16-13-410** criminalizes the knowing removal, alteration, destruction, or concealment of any public record, document, or file belonging to a public office.

D. The concealment or destruction of filed exhibits constitutes **obstruction of justice** under South Carolina common law.

E. These acts also implicate **misconduct in office** under **S.C. Code § 8-1-80** and potential violations of **Rules 3.3 and 8.4** of the South Carolina Rules of Professional Conduct.

### IV. REQUEST FOR IMMEDIATE RELIEF

Plaintiffs respectfully request that this Honorable Court:

1. Immediately open an **emergency investigation** into the missing Exhibit 5 and identify who removed, concealed, or destroyed the document.
2. Direct the Clerk of Court to **restore the full Exhibit 5** (approximately 150 pages) to the docket and provide certified copies to both Judge Murphy and Plaintiffs.
3. Order the preservation of all audit logs, digital access records, and system metadata between January 10, 2025, and November 14, 2025.
4. Refer this matter to the **South Carolina Attorney General** and the **Office of Disciplinary Counsel** for investigation.
5. Sanction any person responsible for the removal or destruction of evidence.
6. Declare **null and void** any rulings or denials issued by Judge Murphy after the Court of Appeals assumed jurisdiction.
7. Grant such other and further relief as may be just and proper.

Dated: November 17, 2025

Respectfully submitted,

Attia Elbadawy,

Lynne Chatlos

Pro Se

493 Wise Road (mailing)

493 Wise Lane (911/physical)

Summerville, SC 29483

Phone: 843-641-8556

ala\_international@yahoo.com

**SOUTH CAROLINA  
DORCHESTER COUNTY**

**COURT OF COMMON PLEAS  
CASE No:2024-CP-1801459  
COA CASE No:2025-001299**

**Attia Elbadawy  
And Lynne Chatlos  
Plaintiffs,  
V  
Dorchester County,  
Defendants,  
And  
D R Horton, Inc  
Defendants,**

**CERTIFICATE OF SERVICE  
EMERGENCY MOTION TO  
INVESTIGATE MISSING PLAINTIFFS  
EXHIBIT #5  
AND IMPROPER ACTION ON  
WRIT OF SUPERSEDEAS**

We, certify that we served a true and correct copy of the foregoing  
**EMERGENCY MOTION TO INVESTIGATE MISSING PLAINTIFFS EXHIBIT #5  
AND IMPROPER ACTION ON WRIT OF SUPERSEDEAS**

by depositing it in the United States Mail,  
first-class postage prepaid, or by certified mail, addressed as  
follows on the date indicated below:

1. Dorchester County Clerk of Court, Cheryl Graham/Priscilla Bolen  
5200 E. Jim Bilton Blvd., St. George, SC 29477.
2. D.R. Horton, Inc., Mark Bible  
325 W. McBee Ave., Suite 301, Greenville, SC 29601.
3. Dorchester County Attorney, Bradley Mitchell  
201 Johnston St., St. George, SC 29477.
4. Clerk of the South Carolina Court of Appeals,  
1220 Senate St., Columbia, SC 29201.

**Attia Elbadawy**

**Lynne Chatlos**

493 Wise Road (mailing)  
493 Wise Lane (911/physical)  
Summerville, SC 29483  
843-641-8556  
ala\_international@yahoo.com  
November 17,2025

# EXHIBIT A

Will show the Dorchester County Court Docket for 01/17/2025 without Exhibit #5, it is missing.

Until 11/14/2025 at the Dorchester County Courts After a long search through the courts docket system, the court found some pages (8-pages) of Exhibit#5 and the rest of the Exhibit has been removed completely gone.

See Exhibit B court docket Shows Exhibit #5 after 11/14/2025

# EXHIBIT A

Shows No Exhibit #5 on the Dorchester County  
Court's Docket on 01/17/2025

Elbadawy, Attia	Evidence to Consolidate Two Cases	Filing		04/09/2025-15:24		
Elbadawy, Attia	Motion/Open Internal Investigation	Motion		04/07/2025-16:39	06/18/2025-16:39	
Elbadawy, Attia	Motion/Compel	Motion		04/07/2025-16:26	06/18/2025-16:26	
Elbadawy, Attia	ADR/Alternative Dispute Resolution (Workflow)	Action		04/03/2025-11:50	04/25/2025-11:50	
Elbadawy, Attia	Service/Certificate Of Service	Filing		03/19/2025-09:35		
Elbadawy, Attia	Plaintiffs to Present New Evidence	Filing		03/14/2025-15:00		
Elbadawy, Attia	Service/Certificate Of Service	Filing		03/14/2025-15:00		
Elbadawy, Attia	Affidavit/Affidavit of Mark Wapshire Clayton Homes	Filing		03/14/2025-15:00		
Elbadawy, Attia	Order/Pro Se Service	Order		03/03/2025-16:05	03/03/2025-16:05	
Elbadawy, Attia	NEF(03-03-2025 04:05:33 PM) Order/Electronic Form 4	Filing		03/03/2025-16:03		
Elbadawy, Attia	Order/Denying TRO	Order		03/03/2025-15:58	03/03/2025-15:58	
Elbadawy, Attia	Service/Certificate Of Service Return Green Card	Filing		03/03/2025-09:41		
Elbadawy, Attia	Motion For Emergency Restraining Order	Motion		02/27/2025-14:37	03/03/2025-14:37	
Elbadawy, Attia	Service/Certificate Of Service Return Green Card	Filing		02/26/2025-11:54		
Elbadawy, Attia	Service/Certificate Of Service Return Green Card	Filing		02/26/2025-11:53		
Elbadawy, Attia	Affidavit of Neighbor Christopher Brown	Filing		02/25/2025-15:02		
Elbadawy, Attia	Adding More Evidence	Filing		02/20/2025-14:55		
Elbadawy, Attia	Service/Certificate Of Service	Filing		02/20/2025-14:50		
Elbadawy, Attia	Interrogatories to Defendant	Filing		02/14/2025-14:08		
Elbadawy, Attia	Service/Certificate Of Service	Filing		02/14/2025-14:08		
Elbadawy, Attia	Request/Request for Production	Filing		02/14/2025-14:07		
Elbadawy, Attia	Service/Certificate Of Service	Filing		02/14/2025-14:07		
Elbadawy, Attia	Service/Proof Of Service	Filing		02/11/2025-09:28		
Elbadawy, Attia	Additional Evidence and Affidavit of Steve Meyer	Filing		02/06/2025-16:08		
Elbadawy, Attia	Service/Certificate Of Service	Filing		02/06/2025-16:08		
Elbadawy, Attia	Service/Proof Of Service	Filing		01/29/2025-12:56		
Elbadawy, Attia	Service/Proof Of Service	Filing		01/28/2025-09:53		
Elbadawy, Attia	Affidavit/Affidavit of Neighbor Amanda Wise	Filing		01/24/2025-12:52		
Elbadawy, Attia	Plaintiffs Adding More Evidence	Filing		01/24/2025-12:50		
D.R. Horton, Inc.	NEF(01-17-2025 05:49:20 PM) Filing/Other	Filing		01/21/2025-09:21		
D.R. Horton, Inc.	NEF(01-17-2025 05:33:30 PM) Affidavit/Affidavit of	Filing		01/21/2025-08:42		
D.R. Horton, Inc.	Filing/Exhibits	Filing		01/17/2025-17:49		
D.R. Horton, Inc.	Filing/Exhibits	Filing		01/17/2025-17:49		

(X)  
(X)  
(X)  
(X)



D.R. Horton, Inc.	Affidavit/Affidavit of	Filing		01/17/2025-17:33		
D.R. Horton, Inc.	NEF(01-17-2025 04:42:55 PM) Memo/Memo in Opposition	Filing		01/17/2025-16:46		
D.R. Horton, Inc.	Memo/Memo in Opposition	Filing		01/17/2025-16:42		
D.R. Horton, Inc.	Affidavit/Affidavit of	Filing		01/17/2025-16:42		
Elbadawy, Attia	Service/Certificate Of Service	Filing		01/17/2025-15:11		
Elbadawy, Attia	Service/Certificate Of Service Certified Mail/A Jordan	Filing		01/17/2025-15:10		
Chatlos, Lynne	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Filing		01/13/2025-15:09		
Elbadawy, Attia	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Filing		01/13/2025-15:09		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/13/2025-14:47		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/13/2025-14:47		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/13/2025-14:47		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/13/2025-14:47		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/13/2025-14:47		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/13/2025-14:47		
Elbadawy, Attia	Service/Certificate Of Service	Filing		01/10/2025-16:44	01/10/2025-09:44	
Elbadawy, Attia	Notice/Plaintiff Notice of Filing/Exhibit #5	Filing		01/10/2025-16:44	01/10/2025-09:50	
Chatlos, Lynne	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Filing		01/03/2025-11:39		
Elbadawy, Attia	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Filing		01/03/2025-11:39		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/03/2025-11:11		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/03/2025-11:11		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/03/2025-11:11		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/03/2025-11:11		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/03/2025-11:11		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		01/03/2025-11:11		
Elbadawy, Attia	Review with County Lawyer/Exhibit 4	Filing		12/30/2024-15:06		
Chatlos, Lynne	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Filing		12/20/2024-11:45		
Elbadawy, Attia	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Filing		12/20/2024-11:44		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		12/20/2024-09:59		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		12/20/2024-09:59		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		12/20/2024-09:59		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		12/20/2024-09:59		
Bible, Mark Anthony Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		12/20/2024-09:59		
Crawford, John T. Jr.	1/21/2025 MOTION Roster/Notice of Case Roster Publication Se	Action		12/20/2024-09:59		

# EXHIBIT B

Shows only 8-pages from Exhibit#5  
Which was filed by the Plaintiffs  
on 01/17/2025.

Dorchester County Courts put them  
back on the court's docket on 11/14/2025

**NOTE:**

Judge Matie Murphy Never reviewed  
All those pages of evidence in Exhibit #5.  
That were filed on 01/17/2025



CERTIFIED COPY

STATE OF SOUTH CAROLINA 17 PM 2:38 IN THE COURT OF COMMON PLEAS

COUNTY OF DORCHESTER

Civil Action No.: 2024-CP-18-01459

*Caryl Adams*  
CLERK OF COURT  
DORCHESTER COUNTY

Attia Elbadawy and Lynne Chatlos,

Plaintiffs

v.

D.R. Horton, Inc.,

Defendant.

**CERTIFICATE OF SERVICE**

\_\_\_\_\_

This is to certify that I have served a true Copy of the Foregoing Plaintiffs' reply to Defendant's/Third Party Plaintiff's Counterclaim on this date January 17th, 2025 by depositing a copy of the same in the United States Mail, proper postage affixed, addressed as follows:

Mark A. Bible, Jr., (SC Bar #101624)  
John T. Crawford, Jr. (SC Bar # 69682)  
KENISON, DUDLEY & CRAWFORD, LLC  
325 West McBee Avenue, Suite 301  
Greenville, SC 29601  
Ph. 864.242.4899 Fax 864.242.4844  
Attorneys for Defendant, D.R. Horton, Inc.

CERTIFIED COPY

STATE OF SOUTH CAROLINA JAN 17 ) PM 2:10 IN THE COURT OF COMMON PLEAS

COUNTY OF DORCHESTER ) Civil Action No.: 2024-CP-18-01459

*Cheryl Madson*  
CLERK OF COURT  
DORCHESTER COUNTY

Attia Elbadawy and Lynne Chatlos, )

Plaintiffs )

v. )

D.R. Horton, Inc., )

Defendant. )

**Plaintiffs Additional Evidence  
Exhibit # 5**

\_\_\_\_\_

This is to certify that I have served a true Copy of the Foregoing Plaintiffs' reply to Defendants/Third Party Plaintiffs Counterclaim on January 17, 2025. The Plaintiffs are adding Additional Evidence EXHIBIT# 5. By depositing a copy of the same in the United States Mail, proper postage affixed, addressed as follows:

Mark A. Bible, Jr., (SC Bar #101624)  
John T. Crawford, Jr. (SC Bar # 69682)  
KENISON, DUDLEY & CRAWFORD, LLC  
325 West McBee Avenue, Suite 301  
Greenville, SC 29601  
Ph. 864.242.4899 Fax 864.242.4844  
Attorneys for Defendant, D.R. Horton, Inc.

FILED-REC'D

2025 JAN 17 PM 2:35

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF DORCHESTER

CHERYL GRAHAM  
CLERK OF COURT  
DORCHESTER COUNTY

Civil Action No.: 2024-CP-18-01459

Attia Elbadawy and Lynne Chatlos,

Plaintiffs

v.

D.R. Horton, Inc.,

Defendant.

Plaintiffs Additional Evidence  
Exhibit # 5

\_\_\_\_\_

This is to certify that I have served a true Copy of the Foregoing Plaintiffs' reply to Defendants/Third Party Plaintiffs Counterclaim on January 17, 2025. The Plaintiffs are adding Additional Evidence EXHIBIT# 5. By depositing a copy of the same in the United States Mail, proper postage affixed, addressed as follows:

Mark A. Bible, Jr., (SC Bar #101624)  
John T. Crawford, Jr. (SC Bar # 69682)  
KENISON, DUDLEY & CRAWFORD, LLC  
325 West McBee Avenue, Suite 301  
Greenville, SC 29601  
Ph. 864.242.4899 Fax 864.242.4844  
Attorneys for Defendant, D.R. Horton, Inc.

FILED-REC'D

2025 JAN 17 PM 2: 35

CHERYL GRAHAM  
CLERK OF COURT  
DORCHESTER COUNTY

**EXHIBIT # 5**

*the New MAP*

Dorchester County GIS Viewer

Public Data

Dorchester County Main Page Register of Deeds Search

+  
 -

X Q  
 Show search results for 493 WI...  
*D.R Horton -*

*D.R Horton*

*D.R Horton  
west land.*

*D.R Horton*



FILED-RECORDED  
 2005 JAN 17 PM 2:35  
 CHERYL GRAHAM  
 CLERK OF COURT  
 DORCHESTER COUNTY

*E5-21*

App State  
 Click to restore the map extent and layers  
 visibility where you left off.

All rights reserved

E5-22

# S.C. LAW FOR ROADS Dedication & Acceptance.

SC Code § 6-29-1170 (2019) ○

The approval of the land development plan or subdivision plat may not be deemed to automatically constitute or effect an acceptance by the municipality or the county or the public of the dedication of any street, easement, or other ground shown upon the plat. Public acceptance of the lands must be by action of the governing body customary to these transactions.

**HISTORY:** 1994 Act No. 355, Section 1.

ES-23.

Wise Rd

From: Kacy Byrd (kbyrd@dorchestercountysc.gov)

To: ala\_international@yahoo.com

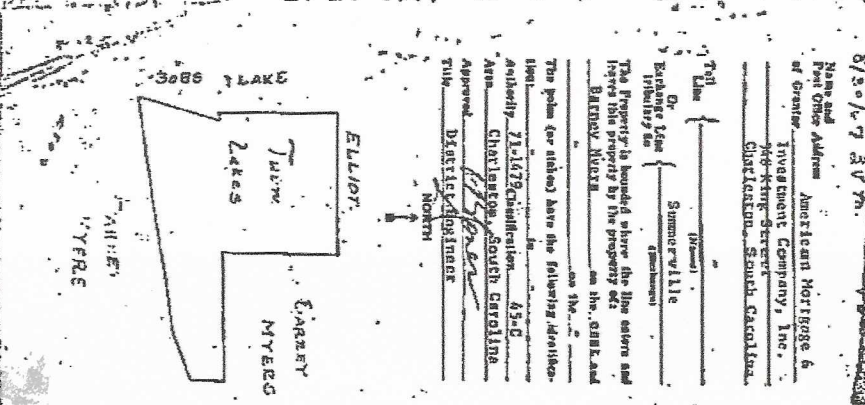
Cc: theber@dorchestercountysc.gov

Date: Friday, November 19, 2021 at 01:59 PM EST

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

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BOOK 154 Page 226



8/30/67 3 P.M.

Name and Post Office Address: American Mortgage & Investment Company, Inc., 140 King Street, Charleston, South Carolina.

Title: Mortgage

Exhibit: Summerville

The Property is bounded above the line shown and below the property by the following description: BARNY MYERS as the...

This plan (see attached) has the following description: Lot 1 - 1/2 Acre, Lot 2 - 1/2 Acre, Total 1 Acre.

Approved: [Signature] District Engineer

GENERAL PERMIT (CORPORATION) Form 507 Rev. 7/1

Received of the SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY, One Bell and No. 100 Dollars, in consideration of which American Mortgage and Investment Company, Inc. hereby grants said Company, its associated and allied companies, their respective successors and assigns, the right to construct, operate and maintain a line of communication consisting of such poles, wires, cables, conduits, guys, anchors and other necessary appurtenances as from time to time are required upon, across, and/or under that certain tract of land situated in Richland County, State of South Carolina, to-wit: That tract of land known as Twin Lakes Subdivision bounded on the north by Elliott on the east by Barney Myers on the south by Myers and on the west by Lake.

to-wit: That tract of land known as Twin Lakes Subdivision bounded on the north by Elliott on the east by Barney Myers on the south by Myers and on the west by Lake.

to-wit: That tract of land known as Twin Lakes Subdivision bounded on the north by Elliott on the east by Barney Myers on the south by Myers and on the west by Lake.

IN WITNESS WHEREOF, the said grantor has caused its name to be hereunto set and its seal hereunto affixed this 12 day of July, 1967.

Signed, sealed and delivered to the presence of: [Signature] AMERICAN MORTGAGE & INVESTMENT CO., INC. By: [Signature] O. T. Wallace, President

Attest: [Signature] (Corporate Seal)

Corporation Form

STATE OF SOUTH CAROLINA } ss. COUNTY OF }

Personally appeared before me James L. Lingooc who, on oath, says that (he) (she), with C.D. Thompson III, saw O. T. Wallace, President of the American Mortgage and Investment Company, Inc., sign and seal, and as the act and deed of said corporation, deliver the within written instrument, and that (he) (she) and C.D. Thompson III witnessed the execution thereof.

Sworn to and subscribed before me this 12 day of August, 1967.

[Signature] Notary Public

Recorded Aug. 30<sup>th</sup> 1967 - 3 P.M.  
 Mailed To - District Engineer  
 P.O. Box 2038-A  
 Charleston, S.C. 184-226  
 attn: Mr. R. J. Chapman

E5-24



Q Search



Map data ©2022

E5-25

FILED-RECO.

STATE OF SOUTH CAROLINA JAN 17, PM 2: 35 IN THE COURT OF COMMON PLEAS

COUNTY OF DORCHESTER CHERYL GRAHAM CLERK OF COURT Civil Action No.: 2024-CP-18-01459 DORCHESTER COUNTY

Attia Elbadawy and Lynne Chatlos,

Plaintiffs

v.

D.R. Horton, Inc.,

Defendant.

CERTIFICATE OF SERVICE

This is to certify that I have served a true Copy of the Foregoing Plaintiffs' reply to Defendant's/Third Party Plaintiff's Counterclaim on this date January 17th, 2025 by depositing a copy of the same in the United States Mail, proper postage affixed, addressed as follows:

Mark A. Bible, Jr., (SC Bar #101624)  
John T. Crawford, Jr. (SC Bar # 69682)  
KENISON, DUDLEY & CRAWFORD, LLC  
325 West McBee Avenue, Suite 301  
Greenville, SC 29601  
Ph. 864.242.4899 Fax 864.242.4844  
Attorneys for Defendant, D.R. Horton, Inc.

D.R Horton  
HOA Subdivision



Attia Elbadawy House

Deadend

Amanda wise  
Utility easement  
Power line

Wise lane Private easement for  
Attia Elbadawy

Also, Utility easement Power line  
For. Attia Elbadawy

Amanda wise  
House

Weir St

Wise Rd

Wise lane branch



Q

Map data © 2025 Terms

**SOUTH CAROLINA**  
**DORCHESTER COUNTY**  
**COURT OF APPEALS**

**COURT OF COMMON PLEAS**

**CASE No: 2024-CP-1801459**

**CASE No: 2025-001299**

Attia Elbadawy and Lynne Chatlos  
Plaintiffs,  
V  
D R Horton, Inc  
Defendants

**EMERGENCY NOTICE OF  
OBJECTION AND FRAUD**

---

D R Horton, Inc  
Third Party Plaintiffs  
V  
Dorchester County  
Third Party Defendants

D R Horton, Inc  
Mark Bible  
325 W McBee Avenue  
Suite#301  
Greenville, SC 29601

Dorchester County  
Attorneys Office Bradley Mitchell  
201 Johnston Street  
St. George, SC 29477

Attia Elbadawy

Lynne Chatlos

493 Wise Road (mailing)  
493 Wise Lane(911/physical)  
Summerville, SC 29483  
843-641-8556  
ala\_international@yahoo.com  
November 14, 2025

*Charles J. Johnson*  
CLERK OF COURT  
DORCHESTER COUNTY

2025 NOV 14 PM 12:43

CERTIFIED COPY

**SOUTH CAROLINA  
DORCHESTER COUNTY**

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

**ATTIA ELBADAWY**

And

**LYNNE CHATLOS,**

Plaintiffs,

v.

**D.R. HORTON, INC.,**

Defendant.

AND

Dorchester County

Defendants,

**EMERGENCY NOTICE OF  
OBJECTION AND FRAUD**

CERTIFIED COPY  
2025 NOV 14 PM 12:43  
Clerk of Court  
DORCHESTER COUNTY

Comes now, on **November 14, 2025**, the Plaintiffs, **Attia Elbadawy** and **Lynne Chatlos**, and hereby file this **Emergency Notice of Objection and Fraud**.

On 11/13/2025 Defendant **D.R. Horton** submitted a fake Certificate of Service and Proof of Service to the Dorchester County Circuit Court claiming that the Plaintiff, **Attia Elbadawy**, did receive two packages delivered by FedEx and claimed that **Attia Elbadawy** signed for the two packages.

The Plaintiff **never received** the two packages by FedEx and **never signed** for them. The Plaintiff therefore asks the Court to **reject the Proof of Service** submitted by **D.R. Horton** and to **sanction D.R. Horton's counsel** for their illegal acts.

Also, **FedEx** has an **open investigation** concerning the two packages that were said to be delivered and signed for by **Attia Elbadawy**. Case # 885943018114

Additionally, the Plaintiff did submit **Exhibit 5** on **January 17, 2025**, before the virtual hearing held on **January 21, 2025**. The Court did remove **Exhibit 5** from the Court's docket. The Plaintiff asks the Court to **restore the Exhibit immediately** so that it may be properly transmitted to the **South Carolina Court of Appeals**.

Finally, the Plaintiff requests that the Court **sanction any employee responsible for altering or removing filings from the official docket**.

# RELIEF REQUESTED

The Plaintiffs respectfully request that this Honorable Court:

1. **Reject** the false Certificate and Proof of Service submitted by **D.R. Horton**;
2. **Order** the immediate **restoration of Exhibit 5** to the court docket;
3. **Refer** the matter of the altered docket entry for internal investigation; and
4. **Impose sanctions** upon D.R. Horton's counsel and any responsible party involved in the fraudulent or misleading acts described herein.

Respectfully submitted,

Attia Elbadawy

Lynne Chatlos

493 Wise Road (mailing)

493 Wise Lane (911 / physical)

Summerville, South Carolina 29483

ala\_international@yahoo.com

Dated: November 14, 2025

**SOUTH CAROLINA  
DORCHESTER COUNTY**

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

Attia Elbadawy  
And Lynne Chatlos  
Plaintiffs,  
V  
Dorchester County,  
Defendants,  
And  
D R Horton, Inc  
Defendants,

**CERTIFICATE OF SERVICE  
EMERGENCY NOTICE OF  
OBJECTION AND FRAUD**

We, certify that we served a true and correct copy of the foregoing  
**EMERGENCY NOTICE OF OBJECTION AND FRAUD**

by depositing it in the United States Mail,  
first-class postage prepaid, or by certified mail, addressed as  
follows on the date indicated below:

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

D R Horton, Inc  
Keniston, Dudley & Crawford, LLC  
Mark Bible  
325 W McBee Avenue  
Suite#301  
Greenville SC 29601

Attia Elbadawy



Lynne Chatlos



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

November 14,2025

*Bradley Mitchell*  
CLERK OF COURT  
DORCHESTER COUNTY  
2025 NOV 14 PM 12:43  
CERTIFIED COPY

**RECEIVED**

**Dec 03 2025**

**SC Court of Appeals**

**CERTIFICATE OF SERVICE**

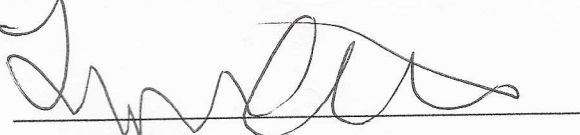
I hereby certify that a true and correct copy of the foregoing Motion to Preserve and Correct the Record was served on all parties by U.S. Mail, first-class postage prepaid, on this 3rd day of December, 2025.

Mark Anthony Bible, Jr., Esq.  
325 West McBee Avenue, Suite 301  
Greenville, SC 29601

John T. Crawford, Jr., Esq.  
325 West McBee Avenue, Suite 301  
Greenville, SC 29601



Attia Elbadawy



Lynne Chatlos