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SC Court of Appeals

**NOTICE TO THE SOUTH CAROLINA COURT OF
APPEALS
REGARDING ORDERS ENTERED WITHOUT
JURISDICTION**



Court of Appeals Case No: 2025-001299
Dorchester Co. Lower Court Case No.: 2024-CP-18-01459

COMES NOW the Appellants, Attia Elbadawy and Lynne Chatlos, appearing pro se, and submit this Notice for informational and record-preservation purposes only.

Following perfection of the appeal, the Circuit Court entered Orders dated December 17, 2025, denying a Motion to Compel, Motion for Investigation, and Motion for Reduced Document Production without jurisdiction or authority.

A Notice of Jurisdictional Objection has been filed in the lower court to preserve the record and prevent waiver or acquiescence.

This Notice does not request relief and is submitted solely to ensure the appellate record accurately reflects the procedural posture of the case.

DEC 29, 2025

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STATE OF SOUTH CAROLINA)
COUNTY OF DORCHESTER)
ATTIA ELBADAWY and LYNNE CHATLOS)
Plaintiff,)
vs.)
1) Dorchester County)
2) D R Horton, Inc)
Defendant.)

IN THE COURT OF COMMON PLEAS
JUDICIAL CIRCUIT
CASE NO.: 2024 -CP- 1801459

CERTIFIED COPY
2025 DEC 29 AM 11:19
DORCHES COUNTY CLERK OF COURT

Plaintiff's Attorney: PRO SE, Bar No.
Address: 493 WISE ROAD, SUMMERVILLE, SC 29483
Phone: 843-641-8556
E-mail: ala_international@yahoo.com
Defendant's Attorney: 2) KENISON, DUDLEY & CRAWFORD
Address: 1) 201 Johnston Street, St. George SC 29477
2) 325 W McBee Avenue, Suite #301, Greenville, SC 29601
Phone: 1) 843-563-0103
E-mail: 2) 864-242-4899

MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)
MOTION=RULE 59e SECTION I: Hearing Information
Nature of Motion: MOTION TO ALTER OR AMEND SUPERSEDAS ORDER (LIMITED TO RECORD ACCURACY)
Estimated Time Needed: 15 MINUTES Court Reporter Needed: YES/NO

SECTION II: Motion/Order Type
Written motion attached
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 Plaintiff/Defendant
Date submitted: DECEMBER 29, 2025

SECTION III: Motion Fee
PAID - AMOUNT: \$ 25.00
EXEMPT: (check reason)
Rule to Show Cause in Child or Spousal Support
Domestic Abuse or Abuse and Neglect
Indigent Status State Agency v. Indigent Party
Sexually Violent Predator Act Post-Conviction Relief
Motion for Stay in Bankruptcy
Motion for Publication Motion for Execution (Rule 69, SCRCF)
Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter:
Other:

JUDGE'S SECTION
Motion Fee to be paid upon filing of the attached order.
Other:
JUDGE CODE
Date: , 20

CLERK'S VERIFICATION
Collected by:
Date Filed: , 20
MOTION FEE COLLECTED: \$
CONTESTED - AMOUNT DUE: \$

**SOUTH CAROLINA
DORCHESTER COUNTY**

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

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

**MOTION- RULE 59(e)
MOTION TO ALTER OR
AMEND SUPERSEDEAS ORDER
(LIMITED TO RECORD ACCURACY)**

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

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Janice H. Johnson
CLERK OF COURT
DORCHESTER COUNTY

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

Attia Elbadawy *attia elbadawy*

Lynne Chatlos *Lynne Chatlos*

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December 23, 2025

2025

RULE 59(e) MOTION TO ALTER OR AMEND SUPERSEDEAS ORDER (LIMITED TO RECORD ACCURACY)

COMES NOW the Appellants and move pursuant to Rule 59(e), SCRCP, for limited alteration or amendment of the Supersedeas Order, solely to correct factual and procedural inaccuracies contained therein.

Rule 59(e) permits a court to alter or amend an order to correct clear factual errors or to prevent manifest injustice. The Supersedeas Order contains inaccuracies apparent on the face of the procedural record.

This Motion is strictly limited to record accuracy. Appellants do not seek reconsideration of the merits, do not seek new findings, and do not request substantive modification beyond correction of inaccuracies.

Ensuring that the Order accurately reflects the record protects the integrity of the appellate process and avoids unnecessary confusion or prejudice at the appellate level.

WHEREFORE, Appellants respectfully request that the Court alter or amend the Supersedeas Order as necessary to accurately reflect the procedural record.

DORCHESTER COUNTY

CLERK OF COURT

David M. [Signature]

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CONCLUSION

Review and Conclusion.

Appellants, after careful review of the Honorable Judge Murphy's review and report on the Appellants' exhibits and the writ of supersedeas, the Appellants object to Honorable Judge Murphy's review and report.

And the Appellants return the matter back to the lower court to review the errors and mistakes in Honorable Judge Murphy's review and report.

In Honorable Judge Murphy's order, the order is full of mistakes and defects.

And those mistakes, there are so many and they are serious mistakes, listing them as the following.

1) Honorable Judge Murphy did not write her report and review on the following exhibits.

Exhibit #1, filed on November 12, 2024.

Exhibit #2, filed on November 12, 2024.

Exhibit#3 filed on November 12, 2024.

Exhibit#5 filed on January 17, 2025.

About her review and report on Exhibit #4, filed on December 30, 2024.

On Exhibit#5, filed on January 10, 2025.

The report on exhibit#4 and exhibit#5 are full of defects and those defects are so many and very serious.

The Appellants have already listed them in the motion.

Also, about the review of her reports about the

Appellants' filing evidence and motions after January 21, 2025, until the June 23,2025 period. Hon Judge Murphy review and report on the Appellants' evidence and motions filed after January 21,2025, is inaccurate and full of mistakes and defects and needs to be corrected. The Appellants did list all the filings and motions that have been filed by the Appellants from the time period of January 24, 2025, until June 23,2025

for the lower court to review & report with precise accuracy.

This section is part of the conclusion. The following pages and exhibits were filed by the Appellants for the January 21, 2025 virtual hearing. The total exhibits related to the Motion for Injunction consist of 6 exhibits.

Exhibit #1 was filed on November 12, 2024.

Exhibit #2 was filed on November 12, 2024.

Exhibit #3 was filed on November 12, 2024.

Exhibit #4 was filed on December 30, 2024.

Exhibit #5 was filed on January 10, 2025.

Exhibit #5 was filed on January 17, 2025.

The total number of pages submitted by the Appellants before the January 21, 2025 virtual hearing were 342 pages

The Honorable Judge Murphy reviewed and reported on only 64 pages out of the 342 pages submitted by the appellants.

The total number of pages submitted by the Appellants from January 21, 2025 until June 23, 2025, which is the date the Honorable Judge Murphy denied the Appellants' Motion to Reconsider the Motion for Injunction, is 1,307 pages.

Accordingly, the total number of pages submitted by the Appellants from September 5, 2024 until January 17, 2025, which was prior to the virtual hearing on the Motion for Injunction held on January 21, 2025, was 342 pages

The total number of pages submitted by the Appellants from January 21, 2025 until the second Motion for Injunction, which was the Motion to Reconsider denied on June 23, 2025, was 1,307 pages total.

Therefore, the grand total of pages related to the Motion for Injunction from September 5, 2024 through June 23, 2025, is 342 pages plus adding the 1,307 pages for a grand total of 1,649 pages submitted by the appellants. Out of the 1,649 pages only a mere 64 pages were reviewed and reported on that related to the Motion for Injunction, by the Honorable Judge Murphy.

Out of the 1,649 pages the appellants submitted 495 pages to the Court of Appeals.

As a result, the Court of Appeals returned the Honorable Judge Murphy's order to the lower court for review and re-reporting on all those missing exhibits.

Accordingly, a total of 1,585 pages remain missing from the exhibit review.



**SOUTH CAROLINA
DORCHESTER COUNTY**

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

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,

**CERTIFICATE OF SERVICE
MOTION=RULE 59(e)
MOTION TO ALTER OR AMEND
SUPERSEDEAS ORDER
(LIMITED TO RECORD ACCURACY)**

We certified that a true copy of MOTION= RULE 59(e)
MOTION TO ALTER OR AMEND SUPERSEDEAS ORDER AND
(LIMITED TO RECORD ACCURACY)

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

2) Dorchester County
Attorney, Bradley Mitchell
201 Johnston St., St. George, SC 29477.

Attia Elbadawy

Lynne Chatlos

493 Wise Road (mailing)
493 Wise Lane (911/physical)
Summerville SC 29483
ala-international@yahoo.com
December 29, 2025

29,

DORCHESTER COUNTY
CLERK OF COURT

Joseph Markson

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