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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Judge of the South Carolina Business Court
Case No.: 2017-CP-26-04187

Unpublished Opinion No. 2025-UP-181
(S.C. Ct. App. Filed August 20, 2025)
(Appellate Case No. 2021-000767)

C. Barry Dykes and Barbara Eisenhardt, Individually and Derivatively on Behalf of the Wild Wing
Plantation Property Owners' Association, Inc.,

Petitioners,

v.

Wild Wing Company, LLC; Sunstar, LLC; Ralph R. Teal, Jr.; SLF IV/SBI Wild Wing, LLC; SLF
IV/SBI JV, LLC; SLF, IV/SBI Properties MM, LLC; SLF IV/SBI Development Holdings, LLC;
Wild Wing Residential Development, LLC; Stratford Land Manager, L.P. d/b/a Stratford Land;
Stratford Land Fund IV, L.P.; SB Investments LLC; Realstar Management, LLC; Graeme T. Black;
H. Gilford Edwards; Founders Wild Wing, LLC; Founders Group International, LLC; Dan Liu; Xian
"Nick" Dou; Rick Schultz; Rick Taylor; and Thomas Plankers,

Respondents,

Wild Wing Plantation Owners' Association, Inc.,

Nominal Defendant.

MOTION FOR COSTS AND ATTORNEY'S FEES

Pursuant to Rule 222(b) of the South Carolina Appellate Court Rules, Respondents
Founders Wild Wing, LLC; Founders Group International, LLC; and Dan Liu request this Court
enter an Order awarding them costs and attorney's fees. The Supreme Court of South Carolina
denied Appellants' Petition for Writ of Certiorari on March 11, 2026, and this Court entered the
remittitur in this appeal on March 12, 2026.

An award of costs is made by "party." See Rule 222(b), SCACR ("The party entitled to
recover costs under this rule may, to the extent the party actually incurred these costs, recover the

following” (emphasis added)); Id. (“In addition, the party shall be entitled to recover an attorney’s fee” (emphasis added)). Although Founders Wild Wing, LLC; Founders Group International, LLC; and Dan Liu are separate parties in this appeal, efforts to represent them were collective considering the capacity in which they were involved. Further, Founders Wild Wing, LLC; Founders Group International, LLC; and Dan Liu incurred attorney’s fees based on representation distinct from other Respondents. Therefore, Respondents Founders Wild Wing, LLC; Founders Group International, LLC; and Dan Liu assert they are entitled to their own award and request as costs the \$2,500 attorney’s fee established by the South Carolina Supreme Court’s January 17, 2018 Order. Enclosed, please find a sworn, Itemized Statement of Costs and Attorney’s Fees.

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Myrtle Beach, South Carolina
March 24, 2026

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THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Judge of the South Carolina Business Court

Appellate Case No. 2025-002300

C. Barry Dykes and Barbara Eisenhardt, Individually and Derivatively On Behalf Of The Wild Wing Plantation Property Owners’ Association, Inc.,.....Appellants/Petitioners,

v.

Wild Wing Company, LLC; Sunstar, LLC; Ralph R. Teal, Jr.; SLF IV/SBI Wild Wing, LLC; SLF IV/SBI JV, LLC; SLF IV/SBI Properties MM, LLC; SLF IV/SBI Development Holdings, LLC; Wild Wing Residential Development, LLC; Stratford Land Manager, L.P. d/b/a Stratford Land; Stratford Land Fund IV, L.P.; SB Investments LLC; Realstar Management, LLC; Graeme T. Black; H. Gilford Edwards; Founders Wild Wing, LLC; Founders Group International, LLC; Dan Liu; Xian “Nick” Dou; Rick Schultz; Rick Taylor and Thomas Plankers,Respondents,

Wild Wing Plantation Owners’ Association, Inc.,Nominal Defendant.

PROOF OF SERVICE

I certify that I have served Respondents Founders Wild Wing, LLC; Founders Group International, LLC; and Dan Liu’s Motion for Costs and Attorney’s Fees on each of the following counsel of record via electronic mail on March 24, 2026, to the email addresses set forth below. Consistent with Rule 262(c)(3), SCACR and section (d)(1) of the Supreme Court of South Carolina’s April 24, 2024 Amended Order, a copy of the email serving the document is enclosed.

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s/ Zachary J. Crowl

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Myrtle Beach, South Carolina
March 24, 2026

Crowl, Zachary J.

From: Crowl, Zachary J.
Sent: Tuesday, March 24, 2026 12:01 PM
To: Robert Lyles; Mackelcan, Douglas W.; Wilson, Skyler C.; Cliff Rollins; Gene Matthews; Scott Talley; 'dsmith@jshwlaw.com'
Cc: Miller, David Brunson; Carrigg, Vickie
Subject: C. Barry Dykes v. Wild Wing Company, LLC 2021-000767
Attachments: Founders Motion for Costs.pdf; Founders Itemized Statement of Costs and Attorney Fees.pdf

Good afternoon,

Please see attached Motion for Costs and Attorney's Fees as well as the Itemized Statement of Costs and Attorney's Fees which will be filed with the Court of Appeals today on behalf of Founders Wild Wing, LLC; Founders Group International, LLC; and Dan Liu.

Thank you,
Zach



Zachary James Crowl

Bellamy, Rutenberg, Copeland, Epps, Gravely & Bowers, P.A.

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