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Oct 14 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEALS FROM DORCHESTER COUNTY

Court of Common Pleas

Matie Murphy, Circuit Court Judge

Diane Goodstein, Circuit Court Judge

Appellate Case No. 2025-001299

Lower Court Case No. 2024-CP-18-01459

Attia Elbadawy and Lynne Chatlos, Appellants,

v.

Dorchester County and D.R. Horton, Inc., Respondents.

Appellate Case No. 2026-001187

Lower Court Case No. 2025-CP-18-01527

Attia Elbadawy and Lynne Chatlos, Appellants,

v.

Dorchester County and D.R. Horton, Inc., Respondents.

**MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT
AND TO ACCEPT PREVIOUSLY SUBMITTED INITIAL BRIEFS**

Rules 208(b)(5) and 240, SCACR

MOTION

Attia Elbadawy and Lynne Chatlos, appearing pro se in Appellate Case No: 2025-001299, and Attia Elbadawy, appearing pro se in Appellate Case No: 2026-001187, respectfully move under Rules 208(b)(5) and 240, SCACR, for permission to exceed the principal-brief page limit and for acceptance of the initial briefs already submitted on October 14, 2026. The grounds are as follows:

1. The submitted initial brief in Case No: 2025-001299 contains 74-PDF pages. The initial brief in Case No. 2026-001187 contains 42- PDF pages. These figures include the covers, tables, and certificates of service. The two briefs total 116- pages. The accompanying designations of matter total approximately 15-pages, making the overall submission approximately 131- pages.
2. Appellants request permission for the 74-page brief in Case No: 2025-001299. If the Court treats the two briefs as one briefing submission, Appellants request permission for their combined 116- pages. If the accompanying designations are counted within the same submission, Appellants request permission for a total of up to 131- pages. The 42-page brief does not independently exceed 50- pages.
3. Appellants are two self-represented individuals, not attorneys. Attia Elbadawy is the sole appellant in the quiet-title appeal. Appellants have prepared their submissions without counsel and ask the Court to consider their practical difficulty in organizing a substantial record and addressing the issues arising from two lower-court actions. They seek discretionary permission under the rule,

rather than an automatic exemption based on pro se status.

4. Both appeals concern Wise Lane and the parties' disputed rights concerning that property. They arise from different lower-court proceedings and orders.

Addressing the procedural history, the relevant facts, the applicable standards of review, and the preserved legal issues in both proceedings requires additional space.

5. The briefs address injunctive relief and the quiet-title proceedings, including issues concerning service, default procedure, title and easement history, and claimed public dedication and acceptance. The materials designated for the record include hearing transcripts, pleadings, orders, plats, deeds or easement documents, correspondence, affidavits, and exhibits. The requested pages permit an explanation of the relevant record materials and their relationship to the issues presented for review.

6. Appellants recognize the importance of concise briefing. The additional length reflects their attempt to present the history and legal issues intelligibly in readable type and spacing. This motion requests no permission to introduce new evidence, expand the record beyond material properly before the lower court, or alter the standards of review.

7. Because the initial briefs have already been submitted, Appellants specifically request acceptance of those submissions despite their length and ask that the lack of advance page-limit permission be excused. This request is made in good faith

to correct the page-limit issue and is not interposed for delay.

8. If the Court determines that further condensation or a different briefing arrangement is required, Appellants alternatively request 30 -days from the Court's order, or such time as the Court directs, to submit replacement briefs conforming to the Court's instructions, rather than rejection or dismissal solely because of the excessive length.

WHEREFORE, Appellants respectfully request that the Court grant the applicable page allowance described in paragraph# 2; accept the initial briefs previously submitted on October 14, 2026; permit the designations to be treated as separate Rule 209 filings; and, alternatively, allow time to submit conforming replacement briefs. Appellants request no change to any existing abeyance order or other deadline except as expressly ordered by the Court.

MEMORANDUM OF LAW IN SUPPORT

Rule 208(b)(5), SCACR, establishes a 50-page limit for principal briefs and a 25-page limit for reply briefs, except in death-sentence cases. It expressly authorizes the appellate court, upon motion, to permit a party to exceed those limits. This provision supplies the direct authority for the requested relief.

Rule 240(c), SCACR, requires a written motion stating its grounds, a supporting memorandum citing authorities, proof of service on all parties, and supporting documentation when the pertinent facts are not in the Record on Appeal. Exhibit A contains the title and contents pages of the two briefs, identifying the submissions and their subject matter. Appellants ask the Court to consider those pages together with the complete briefs already submitted.

Rule 208(b)(1) requires the brief to explain the issues, procedural history, applicable standards of review, argument, and requested relief. Rule 208(b)(4) also requires references to the pertinent record materials supporting salient facts. Appellants submit that the two proceedings, their procedural histories, and the title, easement, service, default, and injunction issues provide concrete grounds for the additional pages requested.

Rule 209, SCACR, separately governs the designation of matter to be included in the Record on Appeal. Appellants therefore ask that the designations be treated as separate documents rather than substantive brief pages. The request for up to 131- pages is an alternative safeguard if the Court treats the entire uploaded

submission as a single package.

Rules 210(c) and 210(h), SCACR, govern the permissible contents of the Record on Appeal and the factual basis of appellate review. Permission for additional briefing pages would not itself make new evidence admissible or make material from one lower-court action automatically part of the record in the other.

Rule 267(c)-(d), SCACR, requires readable type of at least 12- points, double spacing, and one-inch margins. The requested allowance permits readable briefing while presenting the issues arising from both proceedings. Appellants recognize that the Court retains discretion to require shorter or differently organized submissions.

The Court should exercise the authority expressly provided by Rule 208(b)(5) to accept the submitted briefs. If it declines to allow the requested length, Appellants request an opportunity to cure the defect within a time fixed by the court.

SIGNATURES

Respectfully submitted,

Attia Elbadawy

Signed by lynne ch... • Oct 14, 2026

Attia Elbadawy, pro se

Appellant in No.: 2025-001299 and 2026-001187

Lynne Chatlos

Signed by lynne chatlos • Oct 14, 2026

Lynne Chatlos, pro se

Appellant in No. 2025-001299 only

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October 14, 2026

Summerville, South Carolina

CERTIFICATE OF SERVICE

We, certify that on October 14, 2026, we served a true and correct copy
of the foregoing Motion for Leave to Exceed the Page Limit and to Accept
Previously Submitted Initial Briefs, including its memorandum and Exhibit A,
upon counsel for Respondents identified below.

Method of service: United States certified Mail:

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Appellants, pro se,

Attia Elbadawy

Attia Elbadawy

AND Lynne Chatlos

Lynne Chatlos

493 Wise Road, Summerville, SC 29483

Date: October 14, 2026.

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SC Court of Appeals

EXHIBIT A

Title and table-of-contents pages of the initial briefs previously submitted in Appellate Case No:2025-001299 and 2026-001187.

The following four pages reproduce pages 1 and 2 of each brief. The complete brief PDFs contain 74- pages and 42 -pages, respectively. Their full contents are identified in the motion as already submitted to the Court.

THE STATE OF SOUTH CAROLINA

The Court of Appeals

Attia Elbadawy and Lynne Chatlos,

Appellants,

v.

DORCHESTER COUNTY

AND

D R HORTON, INC

Respondents.

APPELLANTS INITIAL BRIEF

Court of Appeals CASE No: 2025-001299

Appeal From Dorchester County

Case No. 2024-CP-18-01459

Attia Elbadawy, Pro Se Appellant

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TABLE OF CONTENTS

Table of Contents	2
Table of Authorities	3
Statement of Issues Presented	5
Statement of the Case and Facts (Chapters I–V)	6
Standard of Review	55
Argument	58
Conclusion and Request for Relief	72
Certificate of Service	74

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY

Court of Common Pleas

Honorable Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2026-001187

Attia Elbadawy and Lynne Chatlos.Appellants,

v.

Dorchester County and D.R. Horton, Inc., Respondents.

INITIAL BRIEF OF APPELLANT

Attia Elbadawy and Lynne Chatlos, Appellants, pro se

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TABLE OF CONTENTS

Table of Authorities	3
STATEMENT OF ISSUES ON APPEAL	5
STATEMENT OF THE CASE	7
STATEMENT OF FACTS RELEVANT TO THE ISSUES	8
ARGUMENT	29
I. Service on Dorchester County and preservation of its service objection	29
II. Service on D.R. Horton, Inc. through an authorized agent	31
III. Default procedure and relief from default	32
IV. Title, tacking, merger, and the scope of utility easements	33
V. Public dedication and acceptance of Wise Lane	39
VI. Injunctive relief and preserved issues concerning the hearing and orders	40
CONCLUSION	40
Certificate of Service	42