

PROTECTIVE NOTICE OF CROSS-APPEAL IN CIVIL CASE

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM AIKEN COUNTY
COURT OF COMMON PLEAS

M. Anderson Griffith, Master-in-Equity

Lower Court Case No. 2020-CP-02-00420

Appellate Case No. 2026-002339

RECEIVED
Oct 23 2026
SC Court of Appeals

Tomislav Todorovic and Julie Todorovic, in their individual capacities and as Trustees of the
Todorovic Family Trust dated June 1, 2021, Respondents/Cross-Appellants,

v.

Cedar Meadows Property Owners Association, Appellant/Cross-Respondent.

Tomislav Todorovic and Julie Todorovic, in their individual capacities and as Trustees of
the Todorovic Family Trust dated June 1, 2021, give notice of cross-appeal to the South Carolina
Court of Appeals under [Rule 203\(c\), SCACR](#). The cross-appeal concerns the following orders
entered by the Honorable M. Anderson Griffith, Master-in-Equity for Aiken County:

1. The order filed June 1, 2026, to the extent it construes Article VII as not requiring the
Appellant to enforce the protective covenants and denies the related enforcement relief
sought by Plaintiffs, particularly the ruling at page 23; the finding of the Appellant's
maintenance and location of the easements.
2. The order filed September 25, 2026, finding no prevailing party and declining to award
Plaintiffs attorney's fees and costs.

Respondents received written notice of entry of the June 1 order on June 1, 2026, and of
the September 25 order on September 25, 2026. Respondents received the Appellant's notice of

appeal on October 21, 2026. This notice is served within the period prescribed by Rule 203(c), SCACR.

This notice preserves Respondents' request for affirmative review if the Court permits the Appellant's corresponding appeal to proceed. Respondents maintain their objection that the Appellant's attempted appeal from the June 1 order is untimely. This notice does not concede appellate jurisdiction over that order or assert that an untimely principal appeal necessarily supports a cross-appeal. Respondents request consideration of their cross-appeal from the June 1 order only if the Court determines that review of that order is properly before it through the Appellant's appeal. Respondents likewise seek review of the September 25 fee order only if the Appellant's appeal from that order proceeds. Any withdrawal will be presented to the Court through the appropriate procedure; this notice does not purport to create automatic dismissal or a special tolling mechanism.

Copies of both orders are attached hereto as required by Rule 203 SCACR

Respectfully submitted,

/s/ Charles A. Krawczyk

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CERTIFICATE OF SERVICE

I certify that on October 23, 2026, I served a true and correct copy of the Protective Notice of Cross-Appeal, with copies of the June 1 and September 25, 2026 orders on counsel for Cedar Meadows Property Owners Association by the following method: by electronic filing with the South Carolina e-filing system and via email to counsel for Appellant.

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