

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge  
Marvin H. Dukes, III, Master-In-Equity

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Appellate Case No. 2011-204367  
Common Pleas Case No. 2011-CP-07-2546

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**RECEIVED**

JUN 04 2014

**SC Court of Appeals**

Joseph C. Sun, *Pro se*,

Appellant,

v.

Olesya Matyushevsky,  
Citizens Opposed to Domestic Abuse,  
Christine Varg and Liling Sun,

Respondents.

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**RESPONDENTS OLESYA MATYUSHEVSKY, CITIZENS OPPOSED TO  
DOMESTIC ABUSE, AND CHRISTINE VARG'S  
MOTION TO DISMISS APPEAL OR, IN THE ALTERNATIVE, TO STRIKE  
APPELLANT'S FINAL BRIEF**

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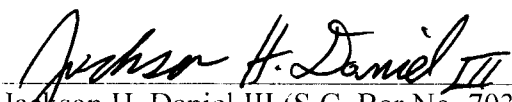
Attorneys for Respondents Olesya Matyushevsky,  
Citizens Opposed to Domestic Abuse and Christine  
Varg

Come now Respondents, Olesya Matyushevsky, Citizens Opposed to Domestic Abuse, and Christine Varg (hereinafter "Respondents") pursuant to Rule 240, SCACR and hereby move this Court for an order dismissing the foregoing appeal or, in the alternative, striking the Appellant's Final Brief. Appellant Sun has repeatedly ignored or failed to comply with the procedural rules of the Court. Appellant Sun's Final Brief violates Rule 211, SCACR because it includes a number of additional factual assertions and legal arguments that were not included in Appellant's Initial Brief. (Appellant's Initial Brief is only nineteen pages; however, Appellant's Final Brief is thirty pages). The Respondents request that the Court dismiss this consolidated appeal pursuant to Rule 260, SCACR because the Appellant has repeatedly violated the procedural rules in this matter.

In the alternative, Respondents request the Court strike the Appellant's Final Brief and order Appellant Sun to submit another Final Brief that complies with Rule 211.

Respectfully submitted,

June 3, 2014

  
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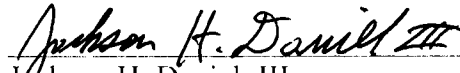
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**PROOF OF SERVICE**

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I certify that I have served **Respondents' Motion to Dismiss Appeal or, In the Alternative, to Strike Appellant's Final Brief** upon the parties below by depositing a copy of it in the United States Mail, postage prepaid, on June 3, 2014, addressed as follows:

Joseph C. Sun P.O. Box 151, Bluffton, SC 29910  
J. Sam Scoville, Esq., Harvey & Battey, P.A., P.O. Drawer 1107, Beaufort, SC 29901

  
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June 3, 2014

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**SC Court of Appeals**

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

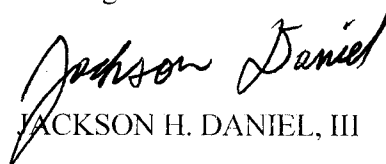
Re: Sun v. Olesya Matyushevsky, Citizens Opposed to Domestic Abuse and  
Christine Varg, et al.  
Appellate Case No: 2011-204367  
Our File No.: 3564-44375

Dear Ms. Kitchings:

Enclosed for filing, please find an original and one copy of Respondents Olesya Matyushevsky, Citizens Opposed to Domestic Abuse, and Christine Varg's Motion to Dismiss Appeal or, In the Alternative, to Strike Appellant's Final Brief.

By copy of this correspondence to all parties, I am serving a copy of the enclosures upon all parties. If you have any questions or concerns, please do not hesitate to contact me.

Best regards.

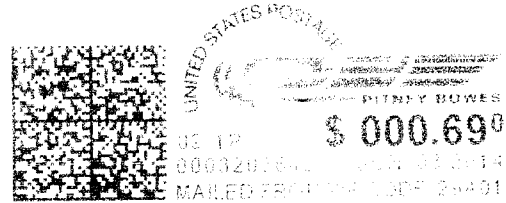
  
JACKSON H. DANIEL, III

JHD:sss  
Enclosures

cc: Joseph C. Sun, *Pro se*  
J. Samuel Scoville, Esq.  
Charles J. Baker, III, Esq.

**LOCK  
ELAND**  
LITIGATION

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