

THE STATE OF SOUTH CAROLINA  
In The SC Court of Appeals

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JUL 21 2014

APPEAL FROM BEAUFORT COUNTY  
Carmen T. Mullen, Circuit Court Judge

**SC Court of Appeals**

S.C. Court of Appeals Case No: 2014-000148

ALEXANDER PASTENE.....Appellant,

v.

THOMAS TROBOUGH, MR & MRS NORMAN GINSBURG, W. RICHARD  
BEETLE, COUNTRY CLUB OF HILTON HEAD, CLUBCORP OF DALLAS, TX.,  
CCHH TENNIS COMMITTEE MEMBERS.....Respondents.

APPELLANT’S RETURN TO ALL OF THE DEFENDANTS MOTION TO DISMISS  
DATED JULY 10, 2014, CLAIMING APPELLANT’S NON COMPLIANCE WITH  
THIS HONORABLE COURT’S ORDER OF  
JUNE 10, 2014.

**C**omes now the Appellant, Alexander Pastene, and answers to respondents’ and their attorneys Motion to Dismiss stating that the Appellant did not comply with this Honorable Court’s Order, which is inconsistent with the facts, as follows:

1. The Appellant was given twenty (20) days to respond to this Honorable Court’s Order. The Court Order was signed in Columbia on June 10, 2014, stamped and seemingly mailed out from Columbia, SC, via the USPS to the Appellant on that same day. See copy of USPS envelope stamped June 10, 2014, enclosed herewith. The Appellant received copy of this Honorable Court’s Order on or about Friday June 13, 2014, possibly Monday June 16, 2014. Assuming receipt by the Appellant on Friday June 13, 2014, then, twenty (20) days from that day was July 3, 2014. The Respondents submitted alleged evidence showing that the


Appellant mailed his Amended Initial Brief plus copies to the Respondents on July 2, 2014, i.e., within the twenty (20) days ordered by this honorable court, wherefore, contrary to the Respondents' arguments the Appellant did comply with this Honorable Court's Order.

2. Besides, after all these years the aging Appellant never abandoned his intention to secure a trial before a jury against *inter alia* two respondents who chose to take justice in their own hands; an arrogant company that violated its own rules, acted unfairly and irresponsibly against the appellant without regret, and then sought impunity by hiring disingenuous attorneys who blatantly abused their positions before these honorable South Carolina courts, managed to have an ongoing case closed, and then lied to affect the outcome of the case *sub judice*; pathetic.
3. Clearly, the respondents harmed the Appellant beyond the meager amount they offered to settle in exchange for all kinds of conditions to exonerate them, which shows the extent of these respondents hubris and disdain for a faithful employee who for three years protected their interest, never missed a single day or was ever late to work at five (5) o'clock in the morning, rain or shine ...the proverbial abuse of powerful people oblivious to *noblesse oblige*; what can the appellant say... it's un American.

Wherefore, the respondents' Motion to Dismiss should be denied, and the Appellant granted his long-awaited day-in-court before a jury in Beaufort County or elsewhere.

Respectfully submitted,

On beautiful Hilton Head Island, SC  
This 19<sup>th</sup> day of July, 2014.

  
\_\_\_\_\_  
Alexander Pastene, Appellant  
Appearing *pro se*  
P.O. Box 22298  
Hilton Head Is., SC 29925  
843-605-5266

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ALEXANDER PASTENE.....Appellant,

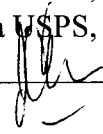
v.

THOMAS TROBOUGH, MR & MRS NORMAN GINSBURG, W. RICHARD  
BEETLE, COUNTRY CLUB OF HILTON HEAD, CLUBCORP OF DALLAS, TX.,  
CCHH TENNIS COMMITTEE MEMBERS.....Respondents.

CERTIFICATE OF MAILING

The Appellant, Alexander Pastene, certifies that on this 19<sup>th</sup> day of July, 2014, he mailed copies of his return to counsel Mary B. Lohr (for respondents Richard Beetle, CCHH, ClubCorp, CCHH Tennis Committee, et al) and attorney Terry Finger (Counsel for respondents Thomas Trobough and Norman Ginsburg), via USPS, to their last known addresses, P.O. Box 40 Beaufort SC and PO Box 24005 HHI, SC. Signed by: \_\_\_\_\_

Alexander Pastene.





South Carolina Court of Appeals

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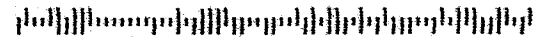
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ALEXANDER PASTENE  
PO BOX 22298  
HILTON HEAD ISLAND SC 29925

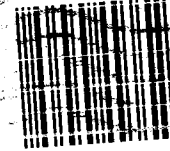
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