

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY

Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2015-000285

RECEIVED
MAR 16 2015
SC Court of Appeals

Spartanburg Buddhist Center of South Carolina, Inc., Respondent,

v.

Ron Ork and Luke Dong,

Appellants.

Ron Ork and Luke Dong,

Third Party Plaintiffs,

v.

Chivin Sun, Robert Pek, Sakhan Sok, Sambo Khiev,
Sophay Pres, and Tommy Ong,

Third Party Defendants.

REPLY TO RETURN TO PETITION FOR WRIT OF SUPERSEDEAS
WITH REQUEST FOR EXPEDITED DECISION

The Respondent gave two reasons why this Court should deny the Appellants' Petition for Writ of Supersedeas:

- 1) The Appellants failed to request a supersedeas from the lower court as required by South Carolina Appellate Court Rules ("SCACR"), Rule 241(d). (Return to Petition, § 36)

The Appellants made a Motion for Stay of Execution of the Contempt Order to the lower court. The Appellants appealed, "(2) the Order dated February 20, 2015

denying the Appellants' SCRPC Rules 59 and 60 Motion, and SCRPC Rule 62 Motion for Stay of Execution of the Contempt Order pending appeal." (Notice of Appeal). The Appellants attached the Motion for Stay to the Notice of Appeal. In the Motion, the Appellants asked the lower court for an "order staying the execution of the Contempt Order [...] [for] the time it takes an appellate court with jurisdiction to rule on any appeal." If this Court is unpersuaded that the Appellants' actions conformed to the requirements of SCACR Rule 241(d), the Appellants argue that "extraordinary circumstances make it impracticable" for the Appellants to make an application to the lower court for supersedeas. SCACR Rule 241(d). Those extraordinary circumstances are that the Appellant Ron Ork (the "Head Monk") will begin a five month prison sentence in early April 2015 unless he produces \$59,765.30. The Head Monk has no income and therefore cannot purge himself of contempt. The Respondent mistakes the Head Monk's many supporters donating cashier's checks for a potential supersedeas bond with the Head Monk having \$59,765.30. (Return to Petition, § 33).

2) The Appellants cited no authority in support of the Petition for Writ of Supersedeas. (Return to Petition, § 41).

On the first page of the Petition, the Appellants state that the Head Monk submitted the Petition pursuant to "Rule 241 of the South Carolina Appellate Court Rules." SCACR Rule 241(d)(2) states that, "After the lower court or administrative tribunal has ruled, any party may petition the appellate court where the appeal is pending or an individual judge or justice for review of this [supersedeas related] order. The individual judge or justice may grant or deny the relief on a temporary basis, and refer the

matter to the full appellate court to hear and determine the matter, or he or she may issue a final order.” SCACR Rule 241 gives this Court the authority to grant the Appellants’ Petition for Writ of Supersedeas.

Although the Respondent’s arguments were only those two set forth above, the Respondent’s Return included grave errors that should not muddy the pool into which this Court must wade for answers to the substantive issues of this Appeal.

This Court does not lack jurisdiction to consider the two Temporary Injunctions that the lower court issued.

The Respondent argued that the Appellants did not timely appeal two Temporary Injunctions issued by the lower court and therefore, this Court “lacks jurisdiction to hear those issues.” (Return to Petition, § 1). “[T]he [appellate] court has jurisdiction over any case in which an appeal is taken from an order, judgment, or decree of the circuit court.” SC Code Ann. § 14-8-200(a). The two Temporary Injunctions to which the Respondent is referring were orders of the circuit court.

“The Supreme Court shall have appellate jurisdiction for correction of errors of law in law cases, and shall review upon appeal... (4) An interlocutory order or decree in a court of common pleas granting, continuing, modifying, or refusing an injunction.” S.C. Code Ann. § 14-3-330(4). In *Link v. School Dist. of Pickens County*, 302 S.C. 1, 393 S.E.2d 176, 179 (S.C., 1990), the Supreme Court of South Carolina held that an appellant can wait to appeal an immediately appealable order (per §14-3-330(2)(c) and §14-3-330(1)) until final judgment. “[A] contempt order is final in nature.” *Tucker v. Honda of*

South Carolina Mfg., 354 S.C. 574, 577, 582 S.E.2d 405 (S.C., 2003). The Appellant has waited until the Contempt Order, a final judgment, to appeal the two Temporary Injunctions. The Court's treatment of the issue is sensible because waiting until a final judgment to appeal previously appealable orders allows the parties' time to settle the case and see whether an appeal of certain orders will become necessary.

The May 2, 2015 email is not an order.

The Respondent argues that an email from Judge R. Keith Kelly's law clerk on May 2, 2015 was the equivalent of an order. (Return to Petition, ¶ 28). The Respondent cites a case decided in 1874, which was prior to enactment of the South Carolina Rules of Civil Procedure, in support of its assertion, *Watson v. Citizens' Sav. Bank*, 5 S.C. 159, 166-67 (S.C. 1874). South Carolina Rules of Civil Procedure, Rule 58(a)(2) states that, "A judgment is effective only when so set forth and entered in the record."

"An order is not final until it is written and entered by the clerk of court."

Bowman v. Richland Memorial Hosp., 515 S.E.2d 259, 335 S.C. 88 (S.C. App., 1999).

"Until written and entered, the trial judge retains discretion to change his mind and amend his oral ruling accordingly." *Va. Mccomb v. Conard*, 394 S.C. 416, 715 S.E.2d 662 (S.C. App., 2011). "The final written order contains the binding instructions which are to be followed by the parties." *Corbin v. Kohler Co.*, 351 S.C. 613, 621, 571 S.E.2d 92, 97 (Ct.App. 2002).

The core of the underlying litigation is not a dispute about a construction agreement.

This origin of the present case is simpler than a dispute about a construction plans for the Buddhist Center's new education building. (Return to Petition, ¶ 4 and 5). Two people hiding behind the Respondent's name, Sambo Khiaev and Robert Pek, acted as the Respondent's members of the Buddhist Center's board and/or as officers at various points in time since the Respondent came into existence on February 16, 2010. Both men were able to siphon off the Buddhist Center's funds by claiming personal expenses and were offered positions of leadership in the Cambodia National Rescue Party in exchange for allowing the political party to use the Buddhist Center for fundraising. Mr. Khiaev agreed to have an election during 2014, but when he realized that the members would not elect him, the present litigation ensued.

The Respondent cannot seriously claim that Mr. Khiaev and Mr. Pek had a problem with the construction agreement. Both men participated in raising money for the construction, mentioned the engineering firm with whom the Buddhist Center had contracted in flyers, and signed a flyer that pictured the planned final building. (Exhibit "A"). Both men participated in the groundbreaking ceremony and would have seen the construction underway in February of 2014. One of the men, Robert Pek, was given the responsibility of communicating with the company who installed the building's septic tank. This fact is particularly interesting because the septic tank was installed in the wrong place.

The Respondent attempts to cast the signers of the construction agreement as mere members who did not have authority to sign the construction agreement during September 2013. The Head Monk, Appellant Luke Dong, and Randy Yip signed the construction agreement and all three acted as board members prior to 2013 alongside Mr.

Khieav. (Exhibit “B”). In fact, Appellant Luke Dong led all construction efforts and pulled permits on behalf of the Buddhist Center.

The Head Monk did not withdraw money from the Buddhist Center’s bank account without the support of the Buddhist Center’s members.

On April 17, 2014, Mr. Pek withdrew \$3,010.00 to pay Respondent’s counsel. On April 18, 2014 the Head Monk withdrew \$61,400.00, the remaining funds, to protect the money from any further misuse. The Buddhist Center’s members authorized the Head Monk to withdraw and protect the money. (Exhibit “C”).

The Head Monk is not hiding or lying about his extreme poverty.

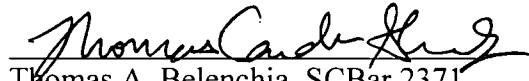
Although the Respondent is not bold enough to say that the Head Monk has enough money to purge himself of contempt, the Respondent does try to imply that the Head Monk is hiding money. (Return to Petition, ¶ 32 “he has taken cross-country trips, hired Appellants’ counsel to facilitate the election prior to the underlying litigation, and likely has been paying his attorneys).

The Respondent *has* taken cross-country trips, but those trips are to teach meditation classes and the students fund him. (Exhibit “D”). The Respondent did not offer evidence of any of its factual assertions in its Return to the Petition, not so much as a verification, but it would be impossible for the Respondent to present any evidence that the Head Monk has paid the Appellants’ attorneys.

As an illustration, imagine that Mr. Pek and Mr. Khieav are successful in the underlying litigation and kick the Head Monk out of the Buddhist Center’s temple in the

middle of the night. The Head Monk would pack his belongings by picking up a light satchel he straps over his shoulder.

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Attorneys for Appellants

March 13, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY

Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

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Sophay Pres, and Tommy Ong, Third Party Defendants.

VERIFICATION OF REPLY TO RETURN TO PETITION FOR WRIT OF SUPERSEDEAS
WITH REQUEST FOR EXPEDITED DECISION


1. We, the undersigned Appellants, are over 18 years of age, have personal knowledge of the facts set forth in the REPLY TO RETURN TO PETITION FOR WRIT OF SUPERSEDEAS WITH REQUEST FOR EXPEDITED DECISION, are duly authorized to state the facts set forth in the Reply and this verification, and are competent to testify to the matters therein contained.

2. We, the undersigned Appellants, have read or have had read and translated to us the contents of the REPLY TO RETURN TO PETITION FOR WRIT OF SUPERSEDEAS WITH REQUEST FOR EXPEDITED DECISION, know the same to be true and correct of our own knowledge, except those matters alleged on information and belief, and as to them, we believe them to be true.

Affiants sayeth nothing further.



Ron Ork, Appellant



Luke Dong, Appellant

SWORN TO AND SUBSCRIBED

Before me, this 13th day of March 2015,

Monica Cande Sheff (SEAL)

Notary Public for South Carolina

My Commission expires 11-18-2023

EXHIBIT

A



មជ្ឈមណ្ឌលព្រះពុទ្ធសាសនាស្រុកស្មៅចុងភ្នំ (ចតុត្ថារៈអង្គ) ឥណ្ឌូ

SPARTANBURG BUDDHIST CENTER OF SOUTH CAROLINA, INC.
A NON PROFIT ORGANIZATION

770 BRYANT ROAD, SPARTANBURG, SC 29303-5002

OFFICE: (864)327-8726, Head monk :Venerable ORK, RON (408)416-8801

Mr Sambo Khieav, President (864)621-6764, Mr. Robert Pek, Registered agent/Incorporator (864)621-9362

www.patsc.org email: spartanburabuddhist@gmail.com

បុណ្យផ្កាប្រាក់សាមគ្គី

គណកម្មការអាចារ្យវត្តព្រះអង្គធំ ព្រមទាំងព្រះគ្រូចៅអធិការវត្ត បានព្រមព្រៀងគ្នាជាឯកច្ឆ័ន្ទនឹង ប្រារព្ធធ្វើបុណ្យផ្កាប្រាក់សាមគ្គីមួយ ដើម្បីជួយឧបត្ថម្ភក្នុងការកសាងសាលាធាន់ ដែលជាសមិទ្ធផល ចុងក្រោយបង្អស់នៃវត្តព្រះអង្គធំរបស់យើង ។

យើងខ្ញុំជាគណកម្មការ សូមគោរពអញ្ជើញលោក-លោកស្រី,លោកតា-លោកយាយ និងសប្បុរសជន ទាំងក្មេងទាំងចាស់ទៅចូលរួមចាប់កុសលក្នុងបុណ្យផ្កាប្រាក់សាមគ្គីខាងលើនេះ តាមកម្លាំងសទ្ធារៀងៗខ្លួន

កម្មវិធីបុណ្យ

ថ្ងៃអាទិត្យ ទី ២៩ ខែ ធ្នូ ឆ្នាំ ២០១៣ កម្មវិធីធ្វើតែមួយថ្ងៃគឺម៉ោង ៩ព្រឹក នមស្សការព្រះរតនត្រៃ,សមាទាន សីល,រាប់បាត្រ-វេរកត្ត និង និមន្តព្រះសង្ឃចំរើនព្រះបរិត្ត-បង្សកូលព្រមគ្នាតែម្តង ។ ពុទ្ធបរិស័ទទទួលទាន អាហារថ្ងៃត្រង់រួច វេលាម៉ោង ១:៣០រសៀលចាប់ផ្តើមដង្ហែរផ្កាប្រាក់ និងវេរផ្កាប្រាក់ជាកិច្ចបង្ហើយបុណ្យ ។

FUNDRAISING FOR CEREMONY HALL CONSTRUCTION

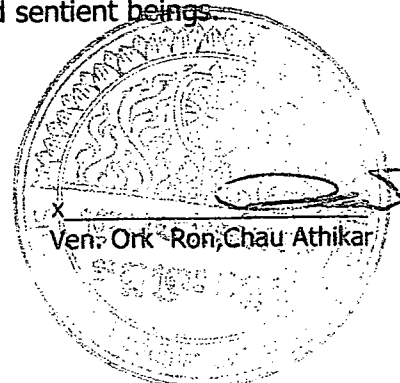
Board of Directors of Spartanburg Buddhist Center of South Carolina Incorporated will organize a special fundraising Ceremony at the end of fiscal year 2013. The purpose of this fundraising is to fulfil our obligations to build the last Ceremony Hall in our Center. The engineer firm that we have contracted is almost completed their structure plan and permit. The work construction will start very soon. All of you and your friends are cordially invited.

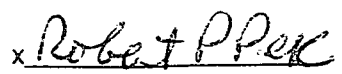
PROGRAM OF EVENT

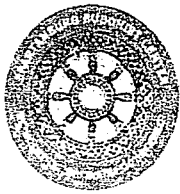
Sunday, December 29, 2013, it is a one day event; start Buddhist Services at 9:00am- Pay Homage to the Triple Gems, Undertake the Five Precepts, Alms service, Offering food to the monks who will chant Paritta and Bangsokol all at once.

After Lay Buddhists and guests having lunch, around 1:30pm, will have a small procession circling the Big Buddha Statue, then offering these public funds that we raised to the monks. It is a traditional Buddhist way to transcient the Merit to our ancestors and sentient beings.


Mr. Sambo Khieav, President




Mr. Robert Pek, Achar Wat



វត្តព្រះអង្គឌីសប៊ិក - ភ្នំពេញ

Spartanburg Buddhist Center of South Carolina, Inc
770 Bryant Road, Spartanburg, SC 29303, Tel: 864-327-8726 / 408-416-8601
email: Spartanburgbuddhist@gmail.com



វត្តព្រះអង្គឌីសប៊ិក Bon Pka Prak Samaki

អាគារភាពព្រះត្រូចៅអធិការ គណៈកម្មការ ព្រមទាំងពុទ្ធបរិស័ទចំណុះជើងវត្តព្រះអង្គឌី បានមូលមត្តិគ្នាផ្ដើមធ្វើ
បុណ្យផ្កាប្រាក់ ដើម្បីប្រមូលបច្ច័យដើម្បីសាងសង់វត្តប្រាសាទសាលា(សាលាឆាន់) ។

ដោយអាស្រ័យហេតុនេះ សូមអញ្ជើញឧបាសក ឧបាសិកា លោកតា លោកយាយ អស់លោក លោកស្រី
អ្នកនាងកញ្ញា និងពុទ្ធបរិស័ទ ជិតឆ្ងាយទាំងអស់អញ្ជើញមកចូលរួម
ឧបត្ថម្ភនឹងអនុមោទនាយក បុណ្យកុសលទៅតាមកម្លាំង
សមត្ថភាពច្រើនៗខ្លួន ។



On behalf of the monks, Board of directors and members of Wat
Preah Angthom, we will hold the Bon Pka Prak Samaki fundraising to build Obhathan Sala (Sala Chhan).
You're cordailly invited to participate in the ceremony of *Bon Pka Prak Samaki* .

កម្មវិធីបុណ្យ

ថ្ងៃសៅរ៍ ១២កើត ខែមិគសិរ ត្រូវនិងថ្ងៃទី១៤ ខែធ្នូ ឆ្នាំ២០១៣ (Saturday, December 14, 2013)

ម៉ោង 6:30pm ជួបជុំពុទ្ធបរិស័ទនមស្សការសមាទានសីល, អាណនព្រះសង្ឃចំរើនព្រះបរិត្ត និងនិមន្តធម្មកថិកសំដែងធម៌ទេសនា ។
The arrival of Buddha's disciples and paying homage to the Triple Gems, Undertake the five precepts,
To request a Buddhist monk to recite a protective prayer and dhamma's talk.

ថ្ងៃអាទិត្យ ១៣កើត ខែមិគសិរ ត្រូវនិងថ្ងៃទី១៥ ខែធ្នូ ឆ្នាំ២០១៣ (Sunday, December 15, 2013)

ម៉ោង 9:30am ជួបជុំពុទ្ធបរិស័ទនមស្សការសមាទានសីល ។ The arrival of Buddha's disciples.
ម៉ោង 10:00am រាប់បាត្រ និងវេរភត្តប្រគេនព្រះសង្ឃ-ជារបង្កកូល និងឧទ្ទិសកុសលដល់ញាតិទាំង៧សត្វាន ។
Putting alms into Almsbowls; Food offering; to devote good merit to the death.
ម៉ោង Noon ពុទ្ធបរិស័ទទទួលភោជនាហារ ។ The Lunch for all Buddha's disciples and guests.
ម៉ោង 1:00pm វេរផ្កាប្រាក់ដល់ព្រះភិក្ខុសង្ឃជាភិក្ខុបញ្ចប់ ។ Offering Prak to the monks & Conclude the ceremony.

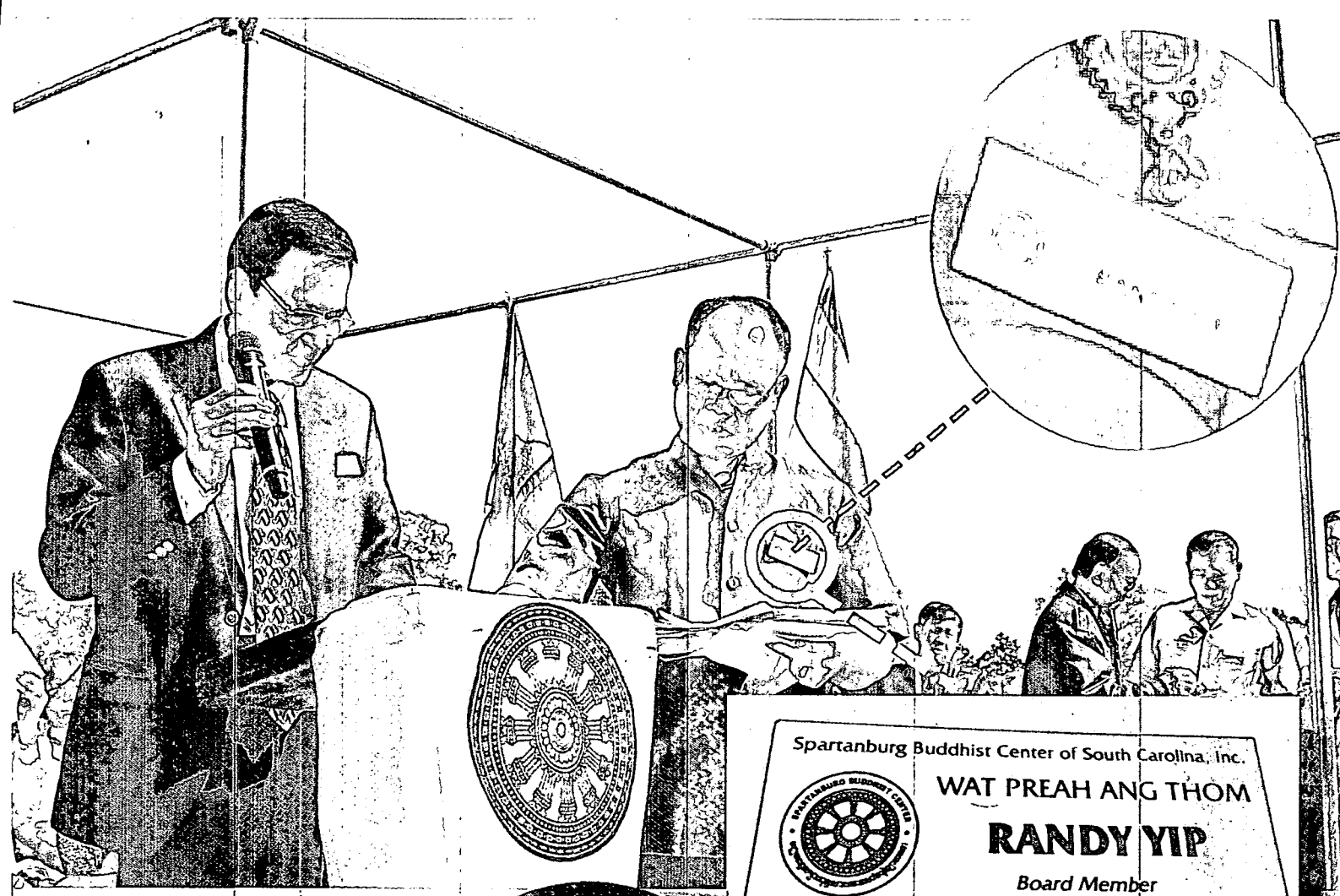


ប្រធានវត្ត
Sambo Khiev
លោក ខេង សំបូរណ៍

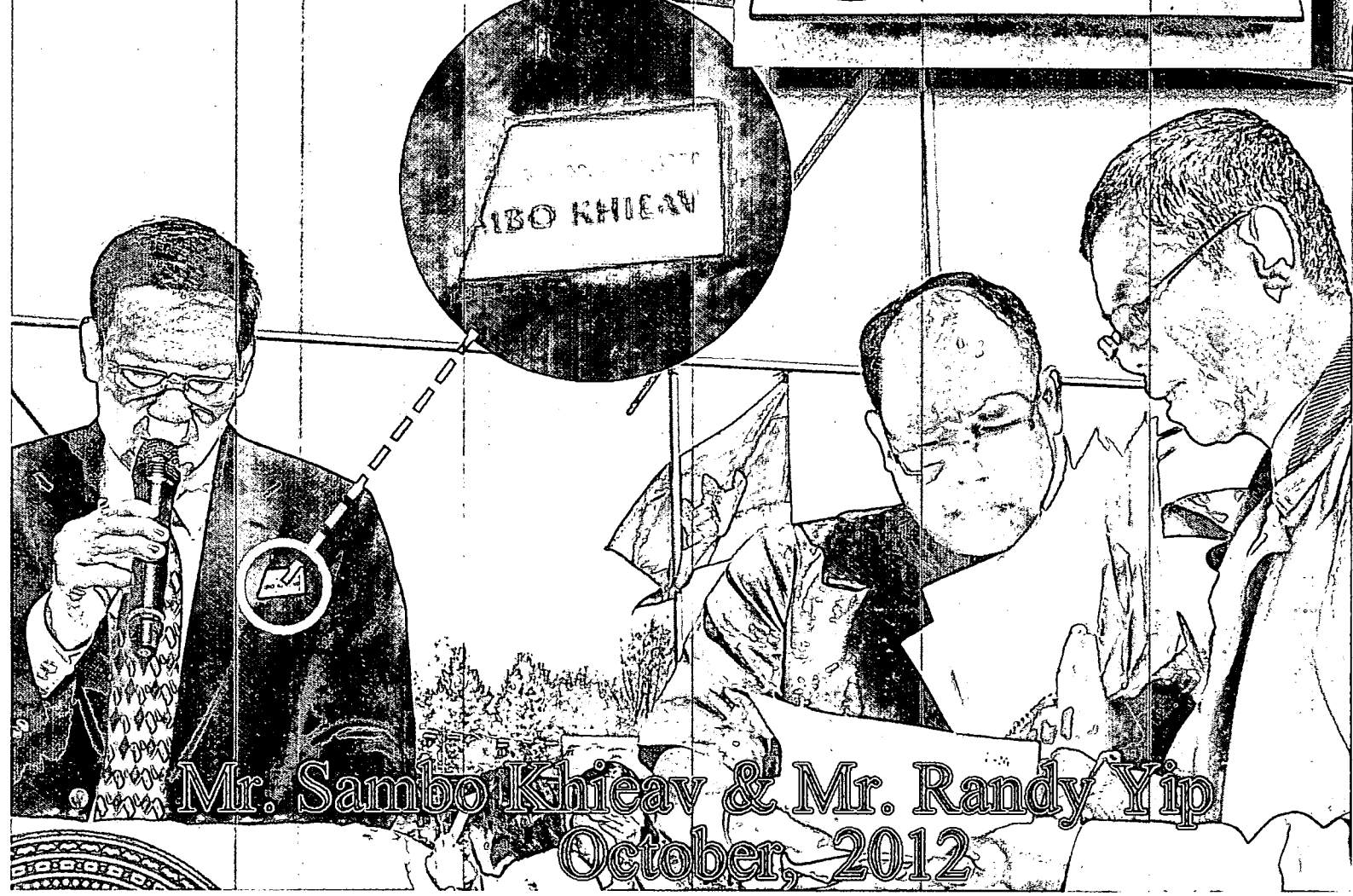
អាចារ្យវត្ត
Robert pek
លោក ខេង គាន

EXHIBIT

B

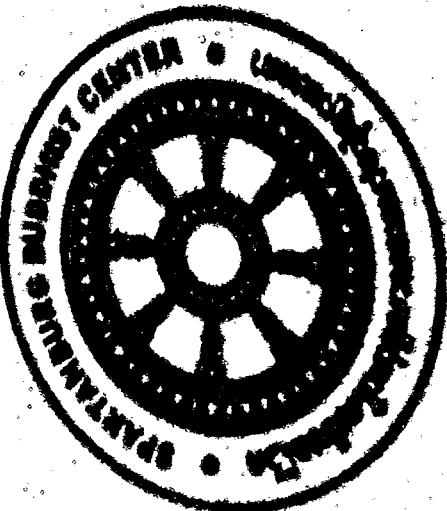


Spartanburg Buddhist Center of South Carolina, Inc.
WAT PRAEH ANG THOM
RANDY YIP
 Board Member



Mr. Sambo Khieav & Mr. Randy Yip
 October, 2012

Spartanburg Buddhist Center of South Carolina, Inc.

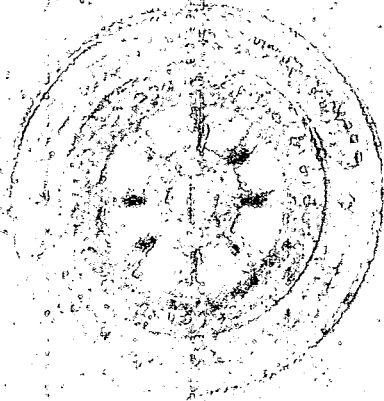


WAT PRAEH ANG THOM

RANDY YIP

Board Member

Myrtleburg Buddhist Center of South Carolina, Inc.



WAT PRAEH ANG THOM
PHAMM LUKE DONG

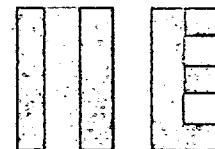
Board Member

EXHIBIT

C



សម្បទានុញ្ញបញ្ជូនប្រាក់បញ្ញើសម្រាប់សាលាថ្មី ភ្នំស្រី (ស្រុះស្រួច)
 Spartanburg Buddhist Center of South Carolina, Inc
 770 Bryant Road, Spartanburg, SC 29303, Tel: 864-308-1138 / 408-416-8801
 email: Spartanburgbuddhist@gmail.com



April 18, 2014

TEMPORARY MONEY TRANSFER

We the people of Spartanburg Buddhist Center of SC, INC. (SBCSC,INC) 770 Bryant Road, Spartanburg, SC, 29303 authorize Ven. Ron Ork to withdraw all the money from the account in bank of America on Ashville hwy, Spartanburg, SC 29303. We feel this is best interest for the temple fund, because this fund for the construction of the New-Hall (Sala Chan) is in progress.

We feel \$3010.00 was withdraw on April 17, 2014 for different purpose not approved by Ven. Ron Ork and all the members. This fund will be keep in the safe place until all legal matter are resolved.

Luke Dong

NOY CHEN ms

TONGHENG CHEA

Chasem tek

Pheum Kansandy

Vannhin Kansandy

Roon Blang

Phiev Blang

puwatt Blang

Artchi Blang

UM SUK

VEN NOEUTH

Ven RIM Chak

Phat Lem

Randy [Signature]

ms

Seng Bom

Smy Wemy

[Signature]

CHAM SEM

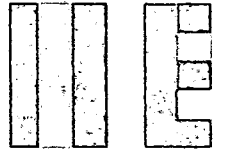
Heem Kereh

Stoyngat SUO

State of South Carolina
 County of Spartanburg
 Notary Public
 4.18.14



ស្នូលព្រះពុទ្ធសាសនាក្រុងស៊ាតធីតា ស្នូលព្រះពុទ្ធសាសនា (វិញ្ញាណ) ភ្នំ (វិញ្ញាណ)
 Spartanburg Buddhist Center of South Carolina, Inc
 770 Bryant Road, Spartanburg, SC 29303, Tel: 864-308-1138 / 408-416-8801
 email: Spartanburgbuddhist@gmail.com



April 18, 2014

TEMPORARY MONEY TRANSFER

We the people of Spartanburg Buddhist Center of SC, INC. (SBCSC,INC) 770 Bryant Road, Spartanburg, SC, 29303 authorize Ven. Ron Ork to withdraw all the money from the account in bank of America on Ashville hwy, Spartanburg, SC 29303. We feel this is best interest for the temple fund, because this fund for the construction of the New-Hall (Sala Chan) is in progress.

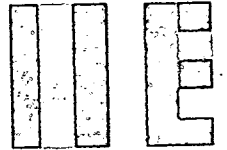
We feel \$3010.00 was withdraw on April 17, 2014 for different purpose not approved by Ven. Ron Ork and all the members. This fund will be keep in the safe place until all legal matter are resolved.

Khounnoeuy Sok	<i>[Signature]</i>	<i>[Signature]</i>
VITHI KIM	<i>[Signature]</i>	<i>[Signature]</i>
VORN M. VANN	<i>[Signature]</i>	<i>[Signature]</i>
NGIN. CHE	<i>[Signature]</i>	<i>[Signature]</i>
Sophea Prom	<i>[Signature]</i>	<i>[Signature]</i>
Ean Kan	<i>[Signature]</i>	<i>[Signature]</i>
LAM XAI	<i>[Signature]</i>	<i>[Signature]</i>
DAKAY	<i>[Signature]</i>	<i>[Signature]</i>
Pha	<i>[Signature]</i>	<i>[Signature]</i>
SHAP	<i>[Signature]</i>	<i>[Signature]</i>
MON CHER	<i>[Signature]</i>	<i>[Signature]</i>
Sophal Dorr	<i>[Signature]</i>	<i>[Signature]</i>
KHOEUM SOK	<i>[Signature]</i>	<i>[Signature]</i>
Eileen Thang	<i>[Signature]</i>	<i>[Signature]</i>
ROEUN LAN	<i>[Signature]</i>	<i>[Signature]</i>

State of South Carolina
 County of Spartanburg
 4.18.14
[Signature]



ស្នូលព្រះពុទ្ធសាសនាក្រុងស៊ាត់សប៊ិក ស្ថាប័នព្រះពុទ្ធសាសនា ចុង (វត្តព្រះអង្គ)
 Spartanburg Buddhist Center of South Carolina, Inc
 770 Bryant Road, Spartanburg, SC 29303, Tel: 864-308-1138 / 408-416-8801
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Wald Chan

- Dong Ceng Leang Lann*
- Samai Ung*
- Bunrom WIT*
- Chanin Chandra*
- Kesara*
- Chh Bun*
- Vanna Huon*

Bruce Chan
mal kyro

Davis Nguyen

Be Nguyen

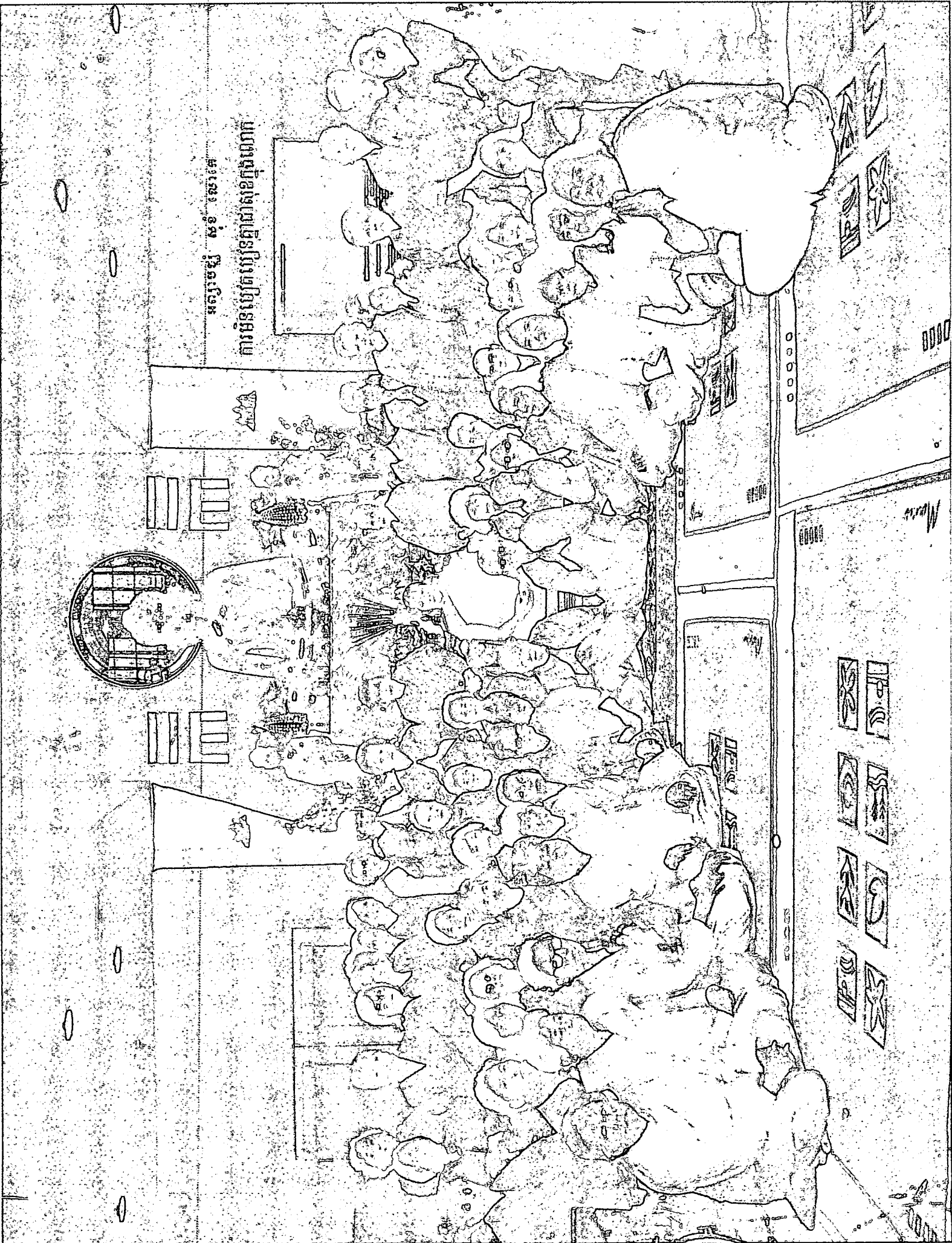
San Kany
Nal Chh

Stated
Colety of Paety
H. 18. 4 Kathy

EXHIBIT

D

អង្គប្រជុំ សុំ ឆោរគេ
ការមិនបៀតបៀនគ្នាជាសុខក្នុងសាលា



**STATEMENT OF CALIFORNIA CAMBODIAN BUDDHIST DEVOTEES
IN RESPONSE TO Mr. SAMBO KHIEV AFFIDAVIT**

We, the California Cambodian Devotees have known Venerable ORK RON, for seven years, after he moved to the US in 2007 from France. The Master Meditation Teacher resided at the Temple in San Jose for three years for Dharma Teaching and Meditation before he moved to PREAH ANG THOM TEMPLE SPARTANBURG BUDDHIST CENTER OF SOUTH CAROLINA, INC. on April 22nd 2010, located at 770 Bryant Road, Spartanburg, SC 29303

Having been a monk almost 30 years, Venerable ORK RON is a great Master Meditation Teacher. His compassion, patience and character with his high knowledge in Buddhism have earned Venerable ORK RON the highest respects and honors from his followers. A warm and inspiring teachings, not limited to the religion, Venerable ORK RON has expressed the practical messages to his students of the importance of compassion, love and kindness. He is very generous, truthful and thoughtful.

At PREAH ANG THOM TEMPLE SPARTANBURG BUDDHIST CENTER OF SOUTH CAROLINA, Venerable ORK RON had built a Meditation Center supported by Cambodian Buddhist Devotees from across the nation. We all went there to celebrate the Grand Opening of the Meditation Center along with many monks from different temples and a lot of people from other states.

- 7. Mrs. Chhun Yen Chhun Yen
- 8. Mrs. Huon Daneth Huon Daneth
- 9. Mrs. Touch Eang Touch Eang
- 10. Mrs. Dao Somalis Dao Somalis
- 11. Mrs. Choun Seanat Choun Seanat
- 12. Mrs. Sann Yan YAN SAM
- 13. Mrs. Vann Heng Vann Heng
- 14. Mrs. Sok Moeut MOEUT SOK
- 15. Mrs. Pek Ear PEK EAR
- 16. Mrs. Lim Yim Lim Yim
- 17. Mrs. Sar Yuth Yuth Sar
- 18. Mrs. Lao Kim Nguon Lao Kim Nguon
- 19. Mr. Ly Ang Ly Ang
- 20. Mrs. Ly Sal Ly Sal
- 21. Mrs. Phang Bopha Bopha Phang
- 22. Mr. Phang Siphon Siphon Phang
- 23. Mr. Lim Keam Ty Lim Keam Ty
- 24. Mrs. Nguon Kim Sean Sean Kim
- 25. Mrs. Nhek, Sitha Sitha Nhek
- 26. Mrs. Lo Chhay Kim Chhay Kim

- | | | |
|-----|--------------------|----------------------|
| 27. | Mr. Lo Bun Leng | <u>Bun Leng</u> |
| 28. | Mrs. Kim Phan | <u>Kim Phan</u> |
| 29. | Mrs. Neang Nhel | <u>Nhel Neang</u> |
| 30. | Mrs. Huy Sandy | <u>Sandy</u> |
| 31. | Mrs. Keo Sokha | <u>Keo Sokha SAN</u> |
| 32. | Mrs. Keo Borun | <u>BORUN KEO</u> |
| 33. | Mrs. Toun Mom | <u>Toun Mom</u> |
| 34. | Mrs. Neang Tevy | <u>Tevy N-</u> |
| 35. | Mrs. Heng Chheap | <u>Heng Chheap</u> |
| 36. | Mrs. Nou Chan | <u>Mrs. Nchan</u> |
| 37. | Mrs. Kim Nath | <u>Kim Nath</u> |
| 38. | Mrs. Ly Hor Eang | <u>Ly Hor Eang</u> |
| 39. | Mrs. Neang Houg | <u>Houg Neang</u> |
| 40. | Mrs. Ouk Sihan | <u>Sihan Ouk</u> |
| 41. | Mrs. Ouk Chan Thet | <u>Chan Thet Ouk</u> |
| 42. | Mrs. Neang Khim | <u>Neang Khim</u> |
| 43. | Mrs. Mean Ottara | <u>Mean Ottara</u> |
| 44. | Mrs. Ban Mann | <u>Ban Mann</u> |
| 45. | Mrs. Toun Sinoun | <u>Toun Sinoun</u> |
| 46. | Mrs. Ban Hour | <u>Ban Hour</u> |

47. Mrs. Ban Chou Ban Chou
48. Mrs. Phana Chou Phanee Chou
49. Mrs. Ee Sophorn Sophorn Ee
50. Mrs. Men Sokha Sokha Men
51. Mrs. Men Sokhom Sokhom Men
52. Mrs. Men Sokhoeun Sokhoeun Men
53. Mrs. Ban Bori Ban Bori
54. Mrs. So Hach So Hach
55. Mrs. Young Borin Young Borin
56. Mrs. So Sophy So Sophy
57. Mrs. Tann Kathie Kathie Tann
58. Mr. Tann Henry Henry Tann
59. Mrs. Saret Kuen Saret Kuen
60. Mr. Pruan Kuen Pruan Kuen
61. Mrs. Arlene Tep Arlene Tep
62. Mr. David Tep David Tep
63. Mrs. Jenny Chhun Jenny Chhun
64. Mrs. Ravan Sieng Ravan Sieng
65. Mrs. Kim Heng Kim Heng
66. Mrs. Sakarl Heng Sakarl Heng

67. Mrs. Ang Lean Hy Angleanhy (562) 485
68. Mrs. Norodom P. Kessar Kessa Norb 7334
69. Mrs. Touch Sary Sary touch
70. Mrs. Hun Say Say / Hun
71. Mr. Ban Bun Heng Bunhy Bun
72. Mrs. Hem Sophany Sophany Hem
73. Mrs. Soun Malida Malida Soun
74. Mrs. Dong Chhan Navy Chhan
75. Mrs. Chhor Somealy Somealy Ch (562) 716-3277
76. Mrs. Neth Sovanna Sovanna Neth (562) 274-5853
77. Mrs. Neth Somealea Somealea Neth (562) 274-2003
78. Mrs. Sakan Thoul Sakan Thoul
79. Mr. Muth Chhot Chhot Muth
80. Mr. Muth Rin Muth Rin
81. Mrs. Muth Socheat Socheat Muth
82. Mr. Kol Pong Pong Kol
83. Mrs. Kol Somaly Somaly Kol
84. Mrs. Seang Hay Seang Phorn
85. Mrs. Chea Leang Kim Chea Leang Kim
86. Mr. Peter Mang Peter Mang

- 87. Mrs. Witney Mang Witney Mang
- 88. Mr. Mak Kim Long Long Mak Kim
- 89. Mr. Chea Pres Chha Pres
- 90. Mrs. Sok Pres Sok Pres
- 91. Mr. Sceifell Mang Sceifell Mang
- 92. Mrs. Dany Rin Dany Rin
- 93. Mrs. Sina Ul Sina Ul
- 94. Mr. Chrea Sek Chrea Sek
- 95. Mrs. Chan Dara Phal Chan Dara Phal
- 96. Mr. Nung Nguon Chheang Nung Nguon Chheang
- 97. Mrs. Sun Lee Sun Lee
- 98. Mrs. Prey Yom Prey Yom
- 99. Mr. John E Tung John E Tung
- 100. Mrs. Sotha Men Sotha Men
- 101. Miss. Thida Reasey Khom Thida Reasey Khom
- 102. Kelven Tung Kelven Tung
- 103. SIVON NUTT S. Nutt
- 104. Saphan Mao Saphan Mao
- 105. SAVOEUN SEK Savoen Sek
- 106. Roatekhada Roatekhada
- 107. NETH, MONOROM (562) 485-7333
- 108. Khak Neng Pea Khak N Pea
- 109. CHANI NOIR Channois

110 - PREAP - Roman (Hok) *Pong*

111 - SENG KIMEAN *Kimean seng*

112 - SARATH PE *Sarath Pe*

113 - SORN HENG *SORN HENG*

114 - NEANG LANG *Neang LANG*

115 - POCH NGA *Pochnga*

116 - SENIA *Senia*

117 - VANTHA *Vantha*

118 - NEANG VANN *Vann Neang*

119 - SAY KESUY *Kyset*

120 - SAM SIMONN *Simon Sam*

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY

Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Case No. 2014-CP-42-01622

Spartanburg Buddhist Center of South Carolina, Inc., Respondent,

v.


Ron Ork and Luke Dong, Appellants.

PROOF OF SERVICE

I, the undersigned attorney for the Appellants do hereby certify that on March 13, 2015, I have served the Clerk of Court for the South Carolina Court of Appeals and all counsel in this action with a copy of the Reply to Return to Petition for Writ of Supersedeas and Expedited Ruling, Reply to Return to Motion to Expedite Appeal, and a Proof of Service by mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

- a. Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
- b. Scott F. Talley
Talley Law Firm
2500 Winchester Place, Suite 100
Spartanburg, SC 29301
- c. Shannon M. Phillips
Talley Law Firm
2500 Winchester Place, Suite 100
Spartanburg, SC 29301

A Business Law Firm, LLC,


T. Camden Shealy

P. O. Box 3421
Spartanburg, SC 29304
(864) 699 - 9801

March 13, 2015