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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas

Steven H. John, Presiding Judge

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SC Court of Appeals

Case No. 2009-CP-26-10523

Appellate Case No. 2012-213287

Elizabeth A. Crotty and James K. Orzech..... Appellants,

v.

Windjammer Village of Little River,
Property Owners' Association, a South Carolina
Eleemosynary Corporation..... Respondent.

**RETURN TO RESPONDENT'S MOTION TO TAX COSTS AGAINST
APPELLANTS**

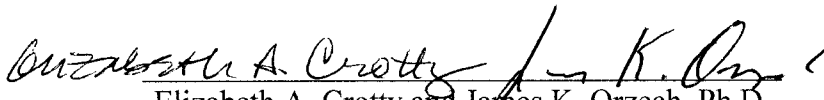
Appellants respectfully request that Respondent's MOTION TO TAX COSTS AGAINST APPELLANTS be denied, in that despite over three years of our submitting lengthy, exhaustive, well thought out Motions, Returns and Briefs, it appears that the Court of Appeals never addressed the primary issues under Appeal, such as the proper interpretation of the words in the Sales Contract. Rather, the Appeals Court's ruling simply confused the notion of whether or not the circuit court judge had the discretion to

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accept our initial Memo as a Rule 60(b) Motion. There was no clear ruling that he did or did not. Perhaps it would have been difficult for the Judges to accept that a subordinate judge had exceeded his discretion and then to rule on the matters that Appellants had raised. However, on at least two prior Motions citing exactly the same issue, the Court chose to deny Respondent's prior MOTIONS TO DISMISS.

In the interest of fairness, we, as citizens and as veterans, should not now be forced to pay even more for justice that appears to have been wrongfully denied.

Respectfully submitted,


Elizabeth A. Crotty and James K. Orzech, Ph.D.
Pro Se Appellant

The B00 House
2148 Gamecock Circle
Little River, SC 29566
Tel: (843) 281-2299

Little River, South Carolina
November 6, 2015

Attorney for Respondent
Kenneth R. Moss, Esq.
628A Sea Mountain Highway
North Myrtle Beach, SC 29582
Tel: (843) 281-9901

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In The Court of Appeals

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APPEAL FROM HORRY COUNTY
Court of Common Pleas of the Fifteenth Judicial Circuit
Steven H. John, Presiding Judge

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Case No. 2009-CP-26-10523

Appellate Case No. 2012-213287

Elizabeth A. Crotty and James K. Orzech, Appellants,

v.

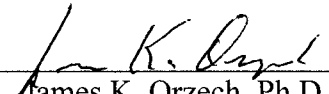
Windjammer Village of Little River, Property Owners' Association, a South Carolina
Eleemosynary Corporation, Respondent.

PROOF OF SERVICE

I certify that I have served a copy of Appellant's RETURN TO RESPONDENT'S
MOTION TO TAX COSTS AGAINST APPELLANTS and Proof of Service of same in the
above-captioned Appeal to Respondent's Counsel of Record by United States Mail, with
sufficient first-class postage affixed, addressed as follows:

Kenneth R. Moss, Esq.
Wright, Worley, Pope, Ekster & Moss, PLLC
628A Sea Mountain Highway
North Myrtle Beach, SC 29582

Respectfully submitted,


James K. Orzech, Ph.D.
Pro Se Appellant

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2148 Gamecock Circle
Little River, SC 29566

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Little River, SC 29566

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SC Court of Appeals

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
2120 Senate Street
P.O. Box 11629
Columbia, SC 29211
Clerk of Court

Re: Elizabeth A. Crotty and James K. Orzech, Appellants, v. Windjammer
Village of Little River, South Carolina, Property Owners' Association, a
South Carolina Eleemosynary Corporation, Respondent

C/A No. 2009-CP-26-10523

Appellate Case No: 2012-213287

Dear Ms. Kitchings:

Please find enclosed Appellant's RETURN TO RESPONDENT'S MOTION TO TAX COSTS
AGAINST APPELLANTS and Proof of Service of same in the above-captioned Appeal

Sincerely,


James K. Orzech
Pro Se Appellant

Cc: Kenneth R, Moss, Respondent's attorney

James Orzech
2148 Gamecock Cir
Little River, SC 29566

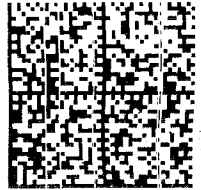
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SC Court of Appeals