

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master-In-Equity

Case No. 2011-CP-07-2546

Joseph C. Sun, Pro se

Appellant,

v.

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

Respondents.

**RESPONDENTS OLESYA MATYUSHEVSKY, CITIZENS OPPOSED TO
DOMESTIC ABUSE, AND CHRISTINE VARG'S
RETURN TO APPELLANT'S MOTION TO CONSOLIDATE**

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SC Court of Appeals

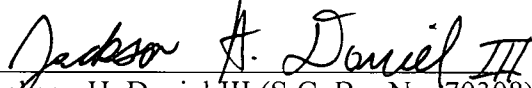
Respondents file this Return to the Appellant's Motion to Consolidate pursuant to South Carolina Appellate Court Rule 240. Respondents do not oppose a consolidation of all three appeals from the lower court, but the Respondents object to the partial consolidation being proposed by the Appellant.

Appellant currently has three appeals pending. All three appeals stem from the same lower court proceeding. The appeals have been assigned the following Appellate Case Numbers: 2011-204367, 2012-211860 and 2012-213433. According to the Motion to Consolidate, Appellant only seeks to consolidate two of his appeals – (1) the appeal of the dismissal of all claims against Liling Sun and (2) the appeal of the dismissal of trespass and conversion claims made against Christine Varg. Unless Appellant dismisses his third appeal related to the claims against Respondents Olesya Matyushevsky, Citizens Opposed to Domestic Abuse, and certain claims against Christine Varg (Appellate Case No. 2012-211860), the Respondents are opposed to his motion.

Respondents will consent to a consolidation of all three pending appeals because they all involve the same facts, similar points of law, and stem from the same trial court action. A consolidation of all three matters would best serve the interest of judicial economy, while a consolidation of only two of the three pending appeals will force these Respondents to argue the same issues and law in two separate appeals. Based on the foregoing, Respondents respectfully request the Court of Appeals consolidate all three appeals.

February 15, 2013

Respectfully submitted,



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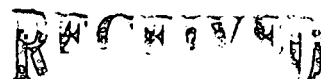
PROOF OF SERVICE

I certify that I have served the following: (1) **Respondents Olesya Matyushevsky, Citizens Opposed to Domestic Abuse, and Christine Varg's Return to Appellant's Motion to Consolidate** upon all parties by depositing a copy of it in the United States Mail, postage prepaid, on February 15, 2013, addressed as follows:

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