

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable William P. Keesley
Appellate Case No. 2018-001867

RECEIVED
JAN 15 2020
SC Court of Appeals

Case No.: 2009-CP-18-2200

Rene McMasters, now known as Rene McMasters Ronaghan, Appellant

v.

H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia, Defendants

Of whom H. Wayne Charpia a/k/a Howard W. Charpia is the Respondent

RETURN OF APPELLANT TO RESPONDENT'S MOTION TO DISMISS
FILED JANUARY 2, 2020

The Appellant, Rene McMasters, hereby submits this Return to Respondent, H. Wayne Charpia's Motion to Dismiss filed January 2, 2020.

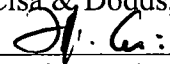
The Respondent contends that the Appellate has not filed and served the record on appeal and her final brief. Respondent's contention is incorrect.

The record on appeal was served on the Respondent on August 9, 2019, as shown by the attached proof of service. The Appellant's final brief was served on the Respondent on August 28, 2019, as shown by the attached proof of service.

The record on appeal and Appellant's final brief were filed in the Clerk's office on August 29, 2019.

It is respectfully submitted that Respondent's Motion to Dismiss should be denied.

Cisa & Dodds, LLP

 _____

Frank M. Cisa

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Mt. Pleasant, SC 29464

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E-mail: frank@cisadodds.com

Attorney for Appellant

This 13th day of January, 2020

Respondent of Record :

H. Wayne Charpia

106 Axtell Drive

Summerville, SC 29485

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AUG 12 2019

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H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia, Defendants

Of whom H. Wayne Charpia a/k/a Howard W. Charpia is the Respondent

PROOF OF SERVICE

I certify that I have served a copy of the Record on Appeal, by United States Mail, postage prepaid, on August 9, 2019, addressed to the Respondent, H. Wayne Charpia, at 106 Axtell Drive, Summerville, SC 29485.

Cisa & Dodds, LLP

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Attorney for Appellant

August 9th, 2019

THE STATE OF SOUTH CAROLINA
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APPEAL FROM DORCHESTER COUNTY
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The Honorable William P. Keesley
Appellate Case No. 2018-001867

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H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia, Defendants

Of whom H. Wayne Charpia a/k/a Howard W. Charpia is the Respondent

PROOF OF SERVICE

I certify that I have served the Final Brief of Appellant, by United States Mail, postage prepaid, on August 28, 2019, addressed to the Respondent, H. Wayne Charpia, at 106 Axtell Drive, Summerville, SC 29485.

Cisa & Dodds, LLP

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Attorney for Appellant

August 28th, 2019

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable William P. Keesley
Appellate Case No. 2018-001867

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v.

H. Wayne Charpia a/k/a Howard W. Charpia and Jody E. Charpia, Defendants

Of whom H. Wayne Charpia a/k/a Howard W. Charpia is the Respondent

PROOF OF SERVICE

I certify that I have served a copy of the Appellant's Return to Respondent's Motion to Dismiss filed January 2, 2020, by United States Mail, postage prepaid, on January 13, 2020, addressed to the Respondent, H. Wayne Charpia, at 106 Axtell Drive, Summerville, SC 29485.

Cisa & Dodds, LLP



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January 13, 2020

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FRANK M. CISA
JOHN J. DODDS III

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January 13, 2020

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

RE: Rene McMasters Ronaghan v. H. Wayne Charpia
Case No.: 2009-CP-18-2200
Appellant No.: 2018-001867
Our file: 09-084

Dear Ms. Kitchings:

Enclosed is the original and seven (7) copies of the Appellant's Return to Respondent's Motion to Dismiss filed January 2, 2020 together with my Proof of Service. I would appreciate you filing the original and returning one (1) filed copy to me in the self-addressed stamped envelope provided.

With kindest regards, I am

Very truly yours,



Frank M. Cisa

FMC/alp
Enclosures

cc: H. Wayne Charpia (w/encls.)

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JAN 15 2020
SC Court of Appeals



CISA & DODDS, LLP
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South Carolina Court of Appeals
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