

3. Contrary to Order, PMO did **not** come to trial **nor** a hearing before the court, where Order denied PMO without giving me a chance to plead its contents before the court.
4. Order cites no lawful grounds, nor cites any rationale, to explain why PMO was denied.
5. On November 19, 2019, I informed the Law Clerk for Judge Stilwell (Exhibit 3), with cc to His Honor, of PMO and questioned whether action on a proposed Order should be deferred until after a hearing for PMO, but no reply was received before an Order granting Summary Judgment was issued on November 25, 2019.
6. On November 24, 2019, I asked the Law Clerk for Judge Stilwell (Exhibit 4), with cc to His Honor, to acknowledge receipt of two e-mails, and requested verification of their awareness of PMO, but no meaningful reply was received.
7. On November 25, 2019, the Law Clerk for Judge Stilwell stated: “We received your emails.”, verifying awareness by the Judge of PMO, but yet an Order which granted Summary Judgment was issued that same day, and I never received further feedback regarding why PMO was not scheduled for a hearing.
8. Per PMO1, on October 31, 2019 (Figure 1) Defense Counsel (Counsel) admitted that an erroneous-legal conclusion was used: that Defendants are immune from suit, in the granting of Defendants' “Motion for Summary Judgment ...” (Motion).
9. Per PMO2, on October 30, 2019 (Figure 2), I cited His Honor's granting of Motion, based upon a “wrong party” argument, as contrary to a precedent previously set, where a same “wrong party” claim was dismissed, as ruled by His Honor, himself, in an Order of January 23, 2018, as related to Civil Action 2017-CP-23-06301 (Exhibit 5).

10. On November 8, 2019, the South Carolina Court of Appeals as related to Appeal 2018-001209, denied a “Motion to Dismiss ...” which brought a similar “wrong party” argument as it related to individuals who comprise the Board of Directors (Exhibit 6).

11. Per PMO9, on October 30, 2019 (Figure 2), a letter to the Honorable Judge Robin B. Stilwell was titled: “... Apparent Error at Law - Lack of Consistent Judgment ...”, and informed His Honor of errors of law that were used to grant Summary Judgment as stated in the Hearing of October 28, 2019.

12. Per PMO11, on October 30, 2019 (Figure 2), I noted that the “South Carolina Nonprofit Corporation Act of 1994” (NPCA), Section 33-31-834(b) does not allow the legal conclusion of “immunity from suit” to be applied as a rationale for granting Summary Judgment.

Dated this 9th day of March, 2020.

Respectfully Submitted,



Raymond A. Wedlake, Plaintiff (*Pro Se*)
703 Creekview Drive
Greenville, SC 29607
864-254-9262 wedlakera@mail.com

EXHIBIT 3

RE: Order from 10/28/19 - Proposed on 11/19/19 112419
rstilwellc@sccourts.org
emily@campbellteague.com, rstilwell@sccourts.org

RE: 2019-CP-23-00269

Dear Ms. Fayall:

Please acknowledge that two e-mails from me, as "Included Messages", below were received.

I had hoped to receive replies with your comments. Please verify you are aware that two Motions:

- 1) Motion for a New Hearing ...
- 2) Motion to Compel ADR Mediation ...

are currently pending. Thank you.

Cheers wedlakera@mail.com
Support "wilderness" - conserve nature !
Be American - buy "Made in USA" !!
GO ORANGE - Syracuse University ORANGE !!
Stop organized crime. Re-elect no one !

----- Included Messages -----

From: "Ray Wedlake" <wedlakera@mail.com>
To: "Stilwell, Robin B. Law Clerk (Kamairi Fayall)" <rstilwellc@sccourts.org>
Cc: emily@campbellteague.com
Subject: RE: Order from 10/28/19 - Proposed on 11/19/19
Date: Tue, 19 Nov 2019 22:05:49

Dear Law Clerk:

Please be informed that my "Motion/New Hearing" was posted in the Pubic Index, including scanned documents, on "11/18/2019-09:39". As your note queried Ms. O'Brian, my Motion was brought since no Order exists from the Hearing on October 28, 2019.

Would you be so kind, please, to inform me if my understanding is incorrect relative to that the "Proposed Order" from Ms. O'Brian should not receive attention, nor be acted upon, until my Motion is heard?

Thank you.

Cheers wedlakera@mail.com
Support "wilderness" - conserve nature !
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----- Original Message -----

Sent: Tuesday, November 19, 2019 at 2:42 PM
RE: Order from 10/28/19 - Proposed on 11/19/19 - ADR Compel 112019
rstilwelllc@sccourts.org
emily@campbellteague.com

Dear Ms. Fayall:

Please be informed that my "Motion to Compel ADR Mediation ..." was posted in the Public Index, including scanned documents, on "11/18/2019-15:50", and is scheduled to be heard on January 14, 2020 at 10:30 before the Honorable Judge Gravely.

My comments on this topic are found in paragraph 5 of my "Motion for a New Hearing ...", and also in paragraph 4, item 2, of "Figure 3" that was attached to my Motion.

Thank you.

Cheers wedlakera@mail.com
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Stop organized crime. Re-elect no one !

EXHIBIT 4

From: "Ray Wedlake" <wedlakera@mail.com>
To: "Stilwell, Robin B. Law Clerk (Kamairi Fayall)" <rstilwelllc@sccourts.org>
Cc: "emily@campbellteague.com" <emily@campbellteague.com>, rstilwell@sccourts.org
Bcc: atty@ggibsonassociates.com
Subject: RE: Order from 10/28/19 - Proposed on 11/19/19
Date: Mon, 25 Nov 2019 13:11:09

Dear Ms. Fayall:

Thank you for confirming my prior e-mails were received. So, you were aware of my pending "Motion for a New Hearing ...".

How then did the Honorable Judge Robin B. Stilwell apparently ignore my Motion, and issue a proposed Order submitted on 19 Nov by Ms. O'Brian, this morning at 10:23? In court, he gave me his word this would not happen, without giving me a chance to review and comment. Such review and comments were contained in my "Motion for a New Hearing...". It seems they were not considered?

Please have the Judge verify no procedural slip-up occurred. If it was his intent to issue the Order, I will be bringing appropriate-counter measures.

Thank you.

Cheers wedlakera@mail.com
Support "wilderness" - conserve nature !
Be American - buy "Made in USA" !!
GO ORANGE - Syracuse University ORANGE !!
Stop organized crime. Re-elect no one !

----- Original Message -----

Sent: Monday, November 25, 2019 at 9:50 AM
From: "Stilwell, Robin B. Law Clerk (Kamairi Fayall)" <rstilwelllc@sccourts.org>
To: "Ray Wedlake" <wedlakera@mail.com>
Cc: "emily@campbellteague.com" <emily@campbellteague.com>
Subject: RE: Order from 10/28/19 - Proposed on 11/19/19

Good morning,

We received your emails.

Kind regards,

Kamairi Fayall