

STATE OF SOUTH CAROLINA
The South Carolina Court of Appeals

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Apr 16 2020

APPEAL FROM GREENVILLE COUNTY
The Honorable Edward W. Miller, Judge of Circuit Court

SC Court of Appeals

Civil Action No. 2019-CP-23-01501
Appellate Case No. 2020-000506

Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc., Appellant,

v.

Scott Bashor, William Craigo, Christopher Edwards, Denis Esteve and Charles Koshis in
their capacity as Members of the current Board of Directors of Woodington Homeowners'
Association, Inc. and Doe Entities 1-10, and John & Jane Does 1-10, Respondents,

DESIGNATION OF MATTER - FOR APPELLANT'S INITIAL BRIEF

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Counsel for Respondents

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Orders

Order filed 05/28/18 [granting involuntary nonsuit]

Order filed 11/08/2019 [denying 2018-001209-Respondents' Motion to Dismiss]

Order filed 02/04/20 [denying an amended complaint]

Order filed 02/25/20 [denying motion for clarification and stay of hearing]

Orders

Order filed 03/13/20 [granting Summary Judgment]

Pleadings

Appellant's Summons and Verified Complaint, filed 03/23/19
Verification

Respondents' Answer of Defendants ... (Jury Trial Demanded), filed 04/24/19

Motions, Memoranda

Respondents' Motion to Dismiss and Supporting Memorandum,
2018-001209, filed 08/08/2019

Motion to Amend Complaint to Name Other Defendants,
Plus Add New Evidence, filed 11/13/19

Defendants' ... Motion For Summary Judgment, filed 01/07/20

Defendants' ... Memorandum in Support of Their Motion for Summary Judgment, filed 02/17/20

Motion for Clarification and Requesting a Stay of Hearing
for Defendants' Motion for Summary Judgment, filed 02/21/20

Memorandum in Opposition to Defendants' Motion for Summary Judgment, filed 02/24/20

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Transcript of Record [February 27, 2020 Before The Honorable Edward W. Miller]

Exhibits, Figures

Appellant's Exhibits as attached to Summons and Verified Complaint filed 03/23/19
Exhibits 5-16

Appellant's Exhibits as attached to Affidavit of Plaintiff Raymond A. Wedlake filed 03/25/19
Exhibits 1- 4

Respondents' Exhibit filed 02/20/20
"By-Laws of Woodington Homowners Association, Inc., Revision 3"

Exhibits, Figures

Appellant's Exhibits as attached to Motion for Clarification and Requesting a Stay of Hearing for Defendants' Motion for Summary Judgment, filed 02/21/20
Exhibit A - Motion for Summary Judgment, 01/07/20 [as above in "Motions"]
Exhibit B - Defendants' ... Responses to Plaintiff's Request to Admit

Appellant's Exhibits as attached to Memorandum in Opposition to Defendants' Motion for Summary Judgment, filed 02/24/20
Exhibit 1 - Memorandum in Opposition ... [2019-CP-23-00269]
Exhibit 2 - Meeting Minutes from WHOA Special Meeting 12/06/18
Exhibit 3 - "Board of Directors" as a Legitimate Party to a Judicial Action is a Proven Fact
Exhibit 4 - By-Laws [as above, indemnification requirements, Article XX]
Exhibit 5 - [to be found]
Exhibit 6 - WHOA Can Not, and Does Not, Qualify for Requisite Tax Exemptions
Figure 1 - O'Brian to Stilwell, October 31, 2019

Appellant's Exhibits as attached to Notice of Appeal
Exhibit 1 [Order filed 02/20/2020]

Appellant's Exhibits as attached to Initial Brief
Exhibit - Attorney Affidavit of Grant H. Gibson, Esq. in Support of Appellant, 04/13/20
Exhibit - Declaration of Covenants, Conditions and Restrictions for Woodington Subdivision, dated April 4, 1989
Exhibit - WHOA to Wedlake [pay \$200 dues, plus assessments], March 13, 2020
Exhibit - "Board of Directors" as a Legitimate Party to a Judicial Action is a Proven Fact [as above]
Exhibit - Wilson, Attorney General, to Sottile, January 3, 2017
Exhibit - Wilson, Attorney General, to Goldfinch, August 5, 2016

Other Documents

Affidavit of Plaintiff, Raymond A. Wedlake [Supporting Verified Complaint], filed 03/25/19

Notice of ADR, filed 10/30/19

IRS Publication 557 Tax-Exempt Status for Your Organization [excerpted pp. 1, 68, and 69], Feb 06, 2020

Notice of Appeal, filed 03/18/20
Exhibit 1 "Order Granting ... Summary Judgment"

Initial Brief of Appellant

Certification of Appellant

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CERTIFICATE OF SERVICE

It is hereby certified that copies of “**Initial Brief of Appellant**” and
“Designation of Matter - for Appellant's Initial Brief” were served upon the following:

James P. Walsh (SC Bar #15180)
Michael J. Murphy (SC Bar #103084)
Clarkson, Walsh & Coulter, P.A.
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via US Priority Mail, Tracking Number: 9505 5265 1566 0106 2665 61

on April 15, 2020.

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703 Creekview Drive
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April 15, 2020

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Apr 16 2020
SC Court of Appeals

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

RE: 2020-000506 (2019-CP-23-01501)

Dear Ms. Kitchings:

Please receive this request with my desire to have **“Initial Brief of Appellant”**, along with other files as may be desired, entered into the computer for my *Pro Se* appeal as above, such that they will subsequently appear in the “Public Index”. Enclosed please find a “Certificate of Service”.

Would you be so kind, please, to enter the “Initial Brief ...” first and to title the entry as “Initial Brief ...”, followed by other documents, if one file will be entered into the computer?

Kindly inform me if providing this service cannot be accomplished.

Thank you!

Sincerely,



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Enc.