

**RECEIVED**

**Jun 01 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

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Appellate Case No. 2021-000511  
Case No. 2020-CP-23-05996                      Case No. 2020-CV-23-10201384

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Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc.,  
and on behalf of other-similarly-situated Members of Woodington Homeowners'  
Association, Inc., Appellant

v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craigo,  
Edward Decker, and Sandra LaCroix at the time of filing; and, McCabe, Trotter & Beverly,  
P.C.; and, State Farm Fire and Casualty Company, Respondents

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**MOTION REQUESTING RESTORATION OF THE ORIGINAL CASE TITLE**

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**COMES NOW** Raymond A. Wedlake, Appellant (Pro Se), and pursuant to Rule 60(a),  
SCRCP, brings this “Motion Requesting Restoration of the Original Case Title” (MFC: Motion  
for Correction) to seek correction of, and relief from, a “clerical mistake” where Orders  
mistakenly and erroneously changed the case title from that which was originally filed with the  
Fairview/Austin Summary Court.

**RULE 60 RELIEF FROM JUDGMENT OR ORDER**

(a) Clerical Mistakes. Clerical mistakes in judgments, orders or other parts  
of the record and errors therein arising from oversight or omission may be  
corrected by the court at any time of its own initiative or on the motion of  
any party and after such notice, if any, as the court orders. During the  
pendency of an appeal, leave to correct the mistake must be obtained

from the appellate court. The ending of a term of court or departure from the circuit shall not operate to deprive the trial judge of jurisdiction to correct such mistakes. A party filing a written motion under this rule shall provide a copy of the motion to the judge within ten (10) days after the filing of the motion.

### **ADMINISTRATIVE HISTORY**

On 06/10/20 Appellant submitted an original Complaint (Exhibit MFC.1). A third Defendant (State Farm ...) was added on 09/28/20 by submitting a “First Amended Complaint” (Exhibit MFC.2). On 12/28/20 Appellant submitted “Notice of Civil Appeal” (Exhibit MFC.3) to the Court of Common Pleas in Greenville County. On 05/17/21 Appellant submitted “Notice of Appeal” to the South Carolina Court of Appeals (Exhibit MFC.4). Text contained in the case caption that describes Appellant and Respondents shall hereinafter be denoted by “Title”.

### **ARGUMENT**

1. Court Records (Exhibits MFC.1 – 4) prove that Title shows 2021-000511 (A511) was not brought against Woodington Homeowners’ Association, Inc. (WHOA). Rather, A511 was brought against the Board of Directors (Board) of WHOA.

2. Court Records (Exhibits MFC.1 – 4) prove that Title as filed intentionally avoided absolute words such as “all”. My case was **not** brought: “... on behalf of **all** other similarly situated Members ...”. Court records (Figure 1) show that evidence was presented to the Court citing six-similarly-situated Members (this is a far cry from all-other-65 Members).

3. Court Records (Exhibits MFC.1 – 4) prove that Title contained the phrase: “... at the time of filing ...” (Phrase). A511 was lawfully brought against the Board pursuant to SC Code

of Laws, Section 33-31-140(3), where however the 2020 Board’s names were cited using the Phrase. A set of changed names exists per a newly elected 2021 Board.

4. Court Records (Exhibits MFC.1 – 4) prove that Appellant always presented Title consistently in his pleadings (Exhibit MFC.5).

5. A changed Title (Exhibit MFC.6) represents a clerical error, based upon information and belief.

**CONCLUSION**

Evidence found from Magistrate-Court Records shows an original Title (Exhibit MFC.5), which must apply going forward as part of the caption for the Court-of-Appeals-Case 2021-000511. Thus, the caption will then match this Court-of-Appeals-Public Record for Appellant’s “Notice of Appeal”. A Magistrate Judge inadvertently changed Title (Exhibit MFC.6), as incorrectly set forth in the Order from the Lower Court, due to clerical error.

Appellant prays for correction of clerical error for reasons stated above. Appellant prays for this Court to **GRANT** his MFC pursuant to Rule 60(a).

Dated this 1<sup>st</sup> day of June, 2021.



Raymond A. Wedlake, Appellant (Pro Se)  
703 Creekview Drive, Greenville, SC 29607  
864-254-9262 [wedlakera@mail.com](mailto:wedlakera@mail.com)

**Memorandum with Citation of Authorities**

<b>Rules</b>		Page
Rule 60(a), SCRPC	.....	2
<b>South Carolina Code of Laws</b>		
Section 33-31-140(3)	.....	3

**FIGURE 1** - Six Member Statements Denying Defendants as Proxy, November 9, 2018 Ballots

(upon request, non-redacted statements will be supplied to the Court as confidential documents)

**Statement "Version B" - No, ballots were not returned**

Pertaining to Two Ballots of November 9, 2018:

Ballot 1: "The Association shall indemnify the 2017 Board Members ..."

Ballot 2: "... the proposed payment plan shall be utilized to pay ..."

1. Were you a Member of Woodington Homeowners' Association, Inc., at the time of November 2018 ballots, representing the voting unit at [REDACTED] Creekview Drive?

Please circle: Yes or No

2. Did you return your voted Ballot 1 and Ballot 2 before the deadline of November 9, 2018?

Please circle: Yes or No

3. Do you affirm that you did not return Ballot 1 nor Ballot 2 before the deadline of November 9, 2018?

Please circle: Yes or No

4. Did you intend for your non-returned ballots to be counted by the Board as "FOR" votes?

Please circle: Yes or No *DID NOT INTEND TO BE COUNTED EITHER WAY*

5. Did you convey signed authority relative to these ballots for the Board to vote as your Proxy?

Please circle: Yes or No *Don't recall*

6. Do you affirm that your foregoing testimony is true and correct to the best of your recollection and knowledge?

Please circle: Yes or No

[REDACTED]

[REDACTED] Creekview Drive

*12/11/18*

Date Signed

**Statement "Version B" - No, ballots were not returned**

Pertaining to Three Ballots of November 9, 2018:

Ballot 1: "The Association shall indemnify the 2017 Board Members ..."

Ballot 2: "... the proposed payment plan shall be utilized to pay ..."

Ballot 3: "... Member ... shall be liable for the legal costs and fees ..."

1. Were you a Member of Woodington Homeowners' Association, Inc., at the time of November 2018 ballots, representing the voting unit at [REDACTED] Claire Lane?

Yes

2. Did you return your voted ballots before the deadline of November 9, 2018?

No

3. Do you affirm that you did not return ballots before the deadline of November 9, 2018?

Yes

4. Did you intend for your non-returned ballots to be counted by the Board as "FOR" votes?

No

5. Did you convey signed authority relative to these ballots for the Board to vote as your Proxy?

No

6. Do you affirm that your foregoing testimony is true and correct to the best of your recollection and knowledge?

Yes

[ *Reynold A. ...* ]

[REDACTED] Claire Lane

[REDACTED] as transcribed by RAW

12/28/2019

Date Signed

■ Claire Lane  
Greenville SC 29607  
December 28, 2019

Raymond Wedlake  
703 Creekview Drive  
Greenville SC 29607

Mr. Wedlake,

This letter is in regards to your recent notice of deposition mailed on December 18, 2019. Neither of your statement versions properly reflect our views on the matter, and as mentioned in your letter as an option; I am writing this to you in lieu of deposition.

My wife and I were members of Woodington Homeowners' Association at the time of the November 2018 ballots. We did not return our voting ballots at all. We are both young professionals and have no time nor interest in neighborhood politics. We were aware that the board would vote on our behalf based on their ballot letter and are completely indifferent on how they would vote on our behalf. We are also indifferent on how the board spends their money. Once we pay our fees and dues to the Woodington Homeowners' Association it then becomes their money to do with as they see fit.

Again, we have no interest in neighborhood politics or votes whatsoever and just want to be left alone.

Sincerely,

A large black rectangular redaction box covering the signature of the sender.

**EXHIBIT 1** - Version A

Civil Action No.: 2019-CP-23-00269

Statement of [REDACTED] in lieu of Deposition

1. I was a Member of Woodington Homeowners' Association, Inc., at the time of November 2018 ballots, and represented the voting unit at [REDACTED] Southfield Drive.
2. I did not return any of Ballot 1, Ballot 2, nor Ballot 3 before the deadline of November 9, 2018.
3. I did not intend for my non-returned ballots to be counted by the Board as "FOR" votes.
4. I did not convey authority relative to these ballots for the Board to vote as my Proxy.

The foregoing Statement is true and correct to the best of my recollection and knowledge.

Signature:

[REDACTED]


Date:

10-18-2019

EXHIBIT 1 - Version A

Civil Action No.: 2019-CP-23-00269

Statement of  in lieu of Deposition

1. I was a Member of Woodington Homeowners' Association, Inc., at the time of November 2018 ballots, and represented the voting unit at  Kristen Way.
2. I did not return any of Ballot 1, Ballot 2, nor Ballot 3 before the deadline of November 9, 2018.
3. I did not intend for my non-returned ballots to be counted by the Board as "FOR" votes.
4. I did not convey authority relative to these ballots for the Board to vote as my Proxy.

The foregoing Statement is true and correct to the best of my recollection and knowledge.

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

10/03/19

**Statement "Version B" - No, ballots were not returned**

Pertaining to Two Ballots of November 9, 2018:

Ballot 1: "The Association shall indemnify the 2017 Board Members ..." ~~(Exhibit 2)~~

Ballot 2: "... the proposed payment plan shall be utilized to pay ..." ~~(Exhibit 3)~~

1. Were you a Member of Woodington Homeowners' Association, Inc., at the time of November 2018 ballots, representing the voting unit at [REDACTED] Woodside Crossing?

Please circle:  Yes or No

2. Did you return your voted Ballot 1 and Ballot 2 before the deadline of November 9, 2018?

Please circle: Yes or  No

3. Do you affirm that you did not return Ballot 1 nor Ballot 2 before the deadline of November 9, 2018?

Please circle:  Yes or No

4. Did you intend for your non-returned ballots to be counted by the Board as "FOR" votes?

Please circle: Yes or  No

5. Did you convey signed authority relative to these ballots for the Board to vote as your Proxy?

Please circle: Yes or  No

6. Do you affirm that your foregoing testimony is true and correct to the best of your recollection and knowledge?

Please circle:  Yes or No

[REDACTED]

[REDACTED] Woodside Crossing, Greenville SC 29607

Received 12/02/2019

EXHIBIT 1 - Version A

Civil Action No.: 2019-CP-23-00269

Statement of [REDACTED] in lieu of Deposition

1. I was a Member of Woodington Homeowners' Association, Inc., at the time of November 2018 ballots, and represented the voting unit at [REDACTED] Southfield Drive.
2. I did not return any of Ballot 1, Ballot 2, nor Ballot 3 before the deadline of November 9, 2018.
3. I did not intend for my non-returned ballots to be counted by the Board as "FOR" votes.
4. I did not convey authority relative to these ballots for the Board to vote as my Proxy.

The foregoing Statement is true and correct to the best of my recollection and knowledge.

Signature

[REDACTED]

Date: 10/4/19

**STATE OF SOUTH CAROLINA** )

**COUNTY OF GREENVILLE** )

Raymond A. Wedlake, as a Member of )  
Woodington Homeowners' Association, Inc. )  
703 Creekview Drive )  
Greenville, SC 29607 )  
864-254-9262 wedlakera@mail.com )  
and on behalf of other-similarly-situated Members )  
of Woodington Homeowners' Association, Inc. )

**PLAINTIFFS** )

**VS.** )

Board of Directors of Woodington Homeowners' )  
Association, Inc., comprised of Mona Craigo, )  
Edward Decker, and Sandra LaCroix at the time )  
of filing )  
18 Southfield Drive )  
Greenville, SC 29607 )  
864-346-7352 woodingtonhoa@gmail.com )

**AND** )

McCabe, Trotter & Beverly, P.C. )  
P.O. Box 212069 )  
Columbia, SC 29221 )  
803-724-5000 ryan.mccabe@mccabetrotter.com )

**DEFENDANTS** )

2020-CV-23-10201384

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CIVIL CASE NUMBER

**IN THE MAGISTRATE'S COURT**

**COMPLAINT**

BREACH OF CONTRACT

BY THE BOARD; PLUS

CONSPIRACY BY McCABE TO

EXTORT CORPORATE FUNDS,

AND CASTING PLAINTIFF

IN A FALSE LIGHT

---

I, Raymond A. Wedlake , the Plaintiff (*Pro Se*) in this action do make the following claims:

1. All of the Board of Directors (Board) of Woodington Homeowners' Association, Inc.

(WHOA), reside in Greenville County, and I believe the defendant: McCabe, Trotter & Beverly, P.C.

(McCabe), practices law in Greenville County, which is within the Judge's magisterial jurisdiction and

this Complaint is properly filed in Greenville County at address:

STATE OF SOUTH CAROLINA

COUNTY OF GREENVILLE

Raymond A. Wedlake, et. al.

Plaintiff(s)

vs.

Board of Directors of Woodington Homeowners' Association, Inc., et. al.

Defendants

IN THE MAGISTRATES'S COURT

AMENDMENT TO COMPLAINT

To the Court and to the Defendants:

Since filing the original Complaint against the Defendants, I have become aware of certain facts that existed at the time of the original filing but which were not known to me. As a result I now wish to amend the original Complaint to include the following facts, allegations and issues as follows:

- 1. as included in the attached "First Amended Complaint ..."
- 2. addition of a third Defendant: State Farm Fire and Casualty Company

I request the Court include these allegations and issues in my action against the Defendants and to note a "Certificate of Service" for copies of the attached "First Amended Complaint ..." and its Exhibits A - Q, served to all Defendants.

As a result of this Amended Complaint, I request the Court grant to me a judgment against the "Board of Directors ..." Defendant in the amount of \$0 = zero dollars, and without any costs, such that monetary damages against the Board Defendant do not exist. For "McCabe" Defendant, no changes from the initial Complaint are desired. For "State Farm" Defendant, no monetary damages are sought, but a Declaratory Judgment citing Breach of Contract by State Farm, and other relief, are desired.

Dated this 28<sup>th</sup> day of September, 2020

*Raymond A. Wedlake*

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

FILED - SUMMARY COURT  
GREENVILLE CO. S.C.  
JUDGE DEAN E. FORBES  
2020 SEP 28 PM 4:19

STATE OF SOUTH CAROLINA )

2020-CV-23-10201384  
CIVIL CASE NUMBER

COUNTY OF GREENVILLE )

Raymond A. Wedlake, as a Member of )  
Woodington Homeowners' Association, Inc. )  
and on behalf of other-similarly-situated Members )  
of Woodington Homeowners' Association, Inc. )  
703 Creekview Drive )  
Greenville, SC 29607 )  
864-254-9262 [wedlakera@mail.com](mailto:wedlakera@mail.com) )

IN THE MAGISTRATE’S COURT

**PLAINTIFFS** )

**FIRST AMENDED COMPLAINT**

**vs.** )

**[AS EXCERPTED]**

Board of Directors of Woodington Homeowners' )  
Association, Inc., comprised of Mona Craigo, )  
Edward Decker, and Sandra LaCroix )  
at the time of filing )  
18 Southfield Drive )  
Greenville, SC 29607 )  
864- 346-7352 [woodingtonhoa@gmail.com](mailto:woodingtonhoa@gmail.com) )

BREACH OF CONTRACT

BY THE BOARD

**and** )

AND BY STATE FARM; PLUS

McCabe, Trotter & Beverly, P.C. )  
P.O. Box 212069 )  
Columbia, SC 29221 )  
803-724-5000 )  
[stephanie.kellahan@mccabetrotter.com](mailto:stephanie.kellahan@mccabetrotter.com) )

CONSPIRACY BY McCABE TO

EXTORT CORPORATE FUNDS,

**and** )

AND CASTING PLAINTIFF

State Farm Fire and Casualty Company )  
One State Farm Plaza )  
Bloomington, Illinois 61710 )  
(877) 734-2265 )

IN A FALSE LIGHT

**DEFENDANTS** )

---

**COMES NOW** Raymond A. Wedlake, Plaintiff (*Pro Se*) and requests that: a) another Defendant “State Farm Fire and Casualty Company” (SF) be recognized, and b) new evidence be admitted and filed via this “First Amended Complaint ...” (FAC), pursuant to

·  
·

EXHIBIT MFC.3

STATE OF SOUTH CAROLINA	)	
	)	
COUNTY OF GREENVILLE	)	<u>2020-CP-23-05996</u>
	)	COMMON PLEAS CASE NUMBER
	)	
Raymond A. Wedlake, as a Member of	)	
Woodington Homeowners' Association, Inc.	)	<u>2020-CV-23-10201384</u>
and on behalf of other-similarly-situated Members	)	MAGISTRATE CIVIL CASE NUMBER
of Woodington Homeowners' Association, Inc.	)	
<b>Appellant</b>	)	
<b>vs.</b>	)	IN THE COURT OF COMMON PLEAS
Board of Directors of Woodington Homeowners'	)	
Association, Inc., comprised of Mona Craigo,	)	
Edward Decker, and Sandra LaCroix	)	
at the time of filing	)	<b>NOTICE OF CIVIL APPEAL</b>
<b>and</b>	)	
McCabe, Trotter & Beverly, P.C.	)	
<b>and</b>	)	
State Farm Fire and Casualty Company	)	
<b>Respondents</b>	)	

FILED  
2020 DEC 28 10 51 AM  
CLERK OF COURT  
GREENVILLE, SOUTH CAROLINA

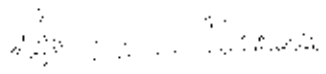
The Plaintiff, Raymond A. Wedlake (*Pro Se*), hereby gives notice of appeal pursuant to Rule 18, SCRMC, from the judgment of the magistrate's court in the above action, to the Circuit Court of Common Pleas, in the county of Greenville.

This notice of appeal is made subsequent to an "Order Granting Defendants' Motion to Dismiss" which was received on the 28<sup>th</sup> day of December, 2020. South Carolina Code of Laws: Title 18, Chapters 1 and 7, grant to Plaintiff a statutory right for this Appeal.

The appellant's exceptions to the judgment of the magistrate are set forth as follows:

- a) The Order granting dismissal was based upon Errors of Law and Errors of Fact;
- b) Plaintiff was not clear about actual-legal grounds upon which dismissal was based;
- c) Plaintiff's pleadings and documents, that gave clear evidence of genuine issues of material fact, were not given lawful consideration pursuant to statutory law, nor pursuant to South Carolina Supreme Court precedents;
- d) Plaintiff reserves the right to file a subsequent Initial Brief that will support these, and additional, claims.

Dated this 28<sup>th</sup> day of December, 2020.

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

Verified

RECEIVED

May 17 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2021-\_\_\_\_\_  
Case No. 2020-CP-23-05996  
Case No. 2020-CV-23-10201384

Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc.,  
and on behalf of other-similarly-situated Members of Woodington Homeowners'  
Association, Inc., Appellant

v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craigo,  
Edward Decker, and Sandra LaCroix at the time of filing; and, McCabe, Trotter & Beverly,  
P.C.; and, State Farm Fire and Casualty Company, Respondents

**NOTICE OF APPEAL**

Pursuant to Rule 203, SCACR, Raymond A. Wedlake appeals the Order (Form 4,  
Exhibit NOA.1) of the Honorable Letitia H. Verdin, electronically signed on May 8, 2021.  
Appellant received written notice of entry of this Order on May 12, 2021. This Order affirmed  
dismissal of Appellant's entire case by a Magistrate's-Court Order of December 28, 2020

(Exhibit NOA.2). Appellant attaches Proof of Service to involved parties. A filing fee of \$150 is remitted by Priority Mail.

May 17, 2021



Raymond A. Wedlake,  
703 Creekview Drive,  
[wedlakera@mail.com](mailto:wedlakera@mail.com)

Appellant (*Pro Se*)  
Greenville, SC 29607  
864-254-9262

Other Counsels of Record:

James Walsh, Esq.  
Clarkson, Walsh & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
[jwalsh@clarksonwalsh.com](mailto:jwalsh@clarksonwalsh.com)  
Attorney for Board Respondent  
864-232-4400

Stephanie Kellahan, Esq.  
McCabe, Trotter & Beverly, P.C.  
PO Box 212069  
Columbia, SC 29221  
[stephanie.kellahan@mccabetrotter.com](mailto:stephanie.kellahan@mccabetrotter.com)  
Attorney for McCabe Trotter Respondent  
803-724-5000

Nicholas A. Farr, Esq.  
Gallivan White & Boyd, P.A.  
PO Box 10589  
Greenville, SC 29603  
[nfarr@gwblawfirm.com](mailto:nfarr@gwblawfirm.com)  
Attorney for State Farm Respondent  
864-271-9580

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

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Appellate Case No. 2021-\_\_\_\_\_  
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Case No. 2020-CV-23-10201384

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**RECEIVED**

**May 17 2021**

**SC Court of Appeals**

Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc.,  
and on behalf of other-similarly-situated Members of Woodington Homeowners'  
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v.

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Edward Decker, and Sandra LaCroix at the time of filing; and, McCabe, Trotter & Beverly,  
P.C.; and, State Farm Fire and Casualty Company, Respondents

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**CERTIFICATE OF SERVICE**

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It is hereby certified that copies of "Notice of Appeal", along with Exhibit NOA.1 and  
Exhibit NOA.2, were served upon three Counsels via electronic mail as follows:

James Walsh, Esq.  
Clarkson, Walsh & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
jwalsh@clarksonwalsh.com  
Attorney for Board Respondent

Stephanie Kellahan, Esq.  
McCabe, Trotter & Beverly, P.C.  
PO Box 212069  
Columbia, SC 29221  
stephanie.kellahan@mccabetrotter.com  
Attorney for McCabe Trotter Respondent

Nicholas A. Farr, Esq.  
Gallivan White & Boyd, P.A.  
PO Box 10589  
Greenville, SC 29603  
nfarr@gwblawfirm.com  
Attorney for State Farm Respondent

and also upon the Clerk of Circuit Court:

Clerk of Court  
Greenville County Courthouse  
305 E North Street  
Greenville, SC 29601

via US Priority Mail, Tracking Number: 9405 5036 9930 0386 0482 75

on May 17, 2021.



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

**EXHIBIT MFC.5 - Original Text of Case Title**

Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc.,  
and on behalf of other-similarly-situated Members of Woodington Homeowners'  
Association, Inc., Appellant

v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craigo,  
Edward Decker, and Sandra LaCroix at the time of filing; and, McCabe, Trotter & Beverly,  
P.C.; and, State Farm Fire and Casualty Company, Respondents

**EXHIBIT MFC.6 - Changed Text of Case Title**

Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc.,  
and on behalf of all other similarly situated Members of Woodington Homeowners'  
Association, Inc., Appellant

v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craigo,  
Edward Decker, and Sandra LaCroix; McCabe, Trotter & Beverly, P.C.; and State Farm Fire  
and Casualty Company, Respondents



THE STATE OF SOUTH CAROLINA  
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v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craigo,  
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and, State Farm Fire and Casualty Company, Respondents

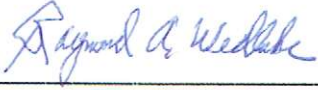
**VERIFICATION OF AFFIDAVIT OF APPELLANT SUPPORTING**

**MOTION REQUESTING RESTORATION OF THE ORIGINAL CASE TITLE**

I, Raymond A. Wedlake, appearing first before the Notary Public, state that I am the  
Appellant in this matter. I have read the attached Affidavit and know or believe the contents and  
allegations are true to the best of my knowledge, except for those matters stated which are  
alleged on information and belief.

Sworn to before me this 1<sup>st</sup> day of June, 2021.

  
\_\_\_\_\_  
Notary Public of South Carolina

  
\_\_\_\_\_  
Raymond A. Wedlake, Appellant *Pro Se*

My Commission expires: 11/8/2029



THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

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Appellate Case No. 2021-000511  
Case No. 2020-CP-23-05996  
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Raymond A. Wedlake, as a Member of Woodington Homeowners' Association, Inc.,  
and on behalf of other-similarly-situated Members of Woodington Homeowners'  
Association, Inc., Appellant

v.

Board of Directors of Woodington Homeowners' Association, Inc., comprised of Mona Craig,  
Edward Decker, and Sandra LaCroix at the time of filing; and, McCabe, Trotter & Beverly,  
P.C.; and, State Farm Fire and Casualty Company, Respondents

---

**CERTIFICATE OF SERVICE**

---

It is hereby certified that copies of “Motion Requesting Restoration of the Original Case Title”, along with Figure 1, and Exhibits MFC.1 – MFC.6, were served upon three Counsels and two Judges as follows:

James Walsh, Esq.  
Clarkson, Walsh & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
jwalsh@clarksonwalsh.com

**RECEIVED**  
**Jun 01 2021**  
**SC Court of Appeals**

Attorney for Board Respondent

Stephanie Kellahan, Esq.

McCabe, Trotter & Beverly, P.C.

PO Box 212069

Columbia, SC 29221

stephanie.kellahan@mccabetrotter.com

Attorney for McCabe Trotter Respondent

Nicholas A. Farr, Esq.

Gallivan White & Boyd, P.A.

PO Box 10589

Greenville, SC 29603

nfarr@gwblawfirm.com

Attorney for State Farm Respondent

via US Priority mail, Tracking Numbers: 9405 5036 9930 0401 7938 90,

9405 5036 9930 0401 7939 06, 9405 5036 9930 0401 7939 13; and:

Letitia H. Verdin, Judge

Greenville County Courthouse

305 E North Street

Greenville, SC 29601

Laura M. Saunders, Judge

Fairview/Austin Summary Court

205 N Maple St Ste 4

Simpsonville, SC 29681

via US Priority Mail, Tracking Numbers:

9405 5036 9930 0401 5583 69,

9405 5036 9930 0401 5583 76

on June 1, 2021.



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