

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

94419

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JUL 14 2021

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
COURT OF COMMON PLEAS
Judge William Keesley

Case # 2009-CP-18-2200

Howard W. Charpia.....Appellant

vs.


Rene McMasters.....Respondent

**MOTION TO STRIKE RESPONDENT'S
INITIAL BRIEF**

I, Howard W. Charpia et al , hereby make this "MOTION TO STRIKE THE
RESPONDENT'S INITIAL BRIEF" filed April 12, 2021.

1. I make this Motion due to the fact (s) that the Respondent was ordered to File their 'Initial Brief' by April 9, 2021 . (see attached)
2. I also make this motion due to the fact that the Court of Appeals has repeatedly allowed the respondent's Attorney to file documents outside the required rules of the Appellant Court.
3. Attorney Cisa has had since December 31, 2020 to file said Initial Brief. (see attached)

Wherefore , I pray that this Court unhold the required laws rules that it has set forth and strike the respondent's "Initial Brief".


Howard W. Charpia

Appellant case # -2019-001516



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

March 23, 2021

H. Wayne Charpia
106 Axtell Drive
Summerville SC 29485

Re: Rene McMasters Ronaghan v. H. Wayne Charpia (5)
Appellate Case No. 2019-001516

Dear Mr. Charpia:

The Court received your letter dated March 15, 2021. Pursuant to the Court's order dated March 10, 2021, our records reflect the respondent's initial brief and ~~resignation of matter are not due to be served and filed until April 9, 2021.~~ Additionally, now is not the time for service and filing of the record on appeal pursuant to Rule 210 SCACR, because the case is still in the initial briefing phase. No further action will be taken on your filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jody E. Charpia".

CLERK

cc: Jody E. Charpia
Frank M. Cisa, Esquire

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 12 2021

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable William P. Keesley
Dorchester County
Appellate Case Number 2019-001516

Trial Court Case No.: 2009-CP-18-2200

Rene McMasters, now known as Rene McMasters Ronaghan,.....Respondent,

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.....Appellant.

INITIAL BRIEF OF RESPONDENT

This 9th day of April, 2021

Appellant of record:
H. Wayne Charpia
106 Axtell Drive
Summerville, SC 28485

Frank M. Cisa
SC Bar No. 1237
Cisa & Dodds, LLP
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464
(843) 881-6530
fax:(843) 881-5433
E-mail: frank@cisadodds.com
Attorney for Respondent



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
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www.sccourts.org

December 31, 2020

Mr. Frank M. Cisa, Esquire
858 Lowcountry Blvd:
Suite 101
Mt. Pleasant SC 29464

Re: Rene McMasters Ronaghan v. H. Wayne Charpia (5)
Appellate Case No. 2019-001516

Dear Mr. Charpia:

Our records reflect that ~~the time for serving and filing the respondent's initial brief and designation of matter has expired.~~ Within ten (10) days of the date of this letter, you may serve and file the respondent's initial brief and designation of matter, along with a motion requesting permission to serve and file the respondent's initial brief and designation of matter outside of the filing deadlines set by Rules 208 and 209 of the South Carolina Appellate Court Rules. ~~Your brief~~

~~will not be considered if no motion is made within ten (10) days of the date of this letter.~~

Very truly yours,


CLERK

cc: H. Wayne Charpia
Jody E. Charpia

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IN THE COURT OF APPEALS

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JUL 14 2021
SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
COURT OF COMMON PLEAS
Judge William Keesley

Case # 2009-CP-18-2200

Howard W. Charpia.....Appellant

vs.

René McMasters.....Respondent

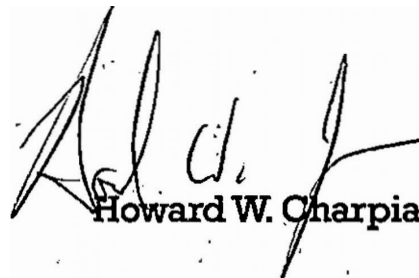
PROOF OF SERVICE

I, Howard W. Charpia , hereby certify that I mailed the " Motioun To Strike
The Respondent's Brief Initial Brief" to:

SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

Attorney Frank M. Cisa
858 Lowcountry Blvd. ST. 101
Mt. Pleasant , SC 29464

Date mailed July 13 2021


Howard W. Charpia

CHARPTA
106 Axtell Dr.
Summerville, SC
29485

RECORDED
JUL 14 2021
SC Court of Appeals

SC Court of Appeals
1220 Senate Street
Columbia, SC
29201

Att:
2019-001516