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**Jan 18 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Marvin H. Dukes, III, Master in Equity & Special Circuit Court Judge

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Appeal Case No. 2021-000434

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Bluffton Park Community Owners' Association, Inc., Respondent,

v.

Joseph Chakyng Sun, as Trustee of The 2009 Sun's Family Trust in South Carolina, USA;  
Joseph Chakyng Sun, Individually; Liling Sun n/k/a Liling Walsh; Oleysa Matyushevsky;  
Christine Varg; and Citizens Opposed to Domestic Abuse, Defendants,

of whom Joseph Chakyng Sun, as Trustee of The 2009 Sun's Family Trust in South Carolina,  
USA and Joseph Chakyng Sun, Individually is the Appellant.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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Appellant proposes the following be included in the record on Appeal:

1. Summons and Complaint – Lien Foreclosure filed October 1, 2019.
2. Affidavit of Non-Service filed November 15, 2019 as to Appellant Trust
3. Affidavit of Non-Service filed November 15, 2019 as to Appellant Sun
4. Affidavit in Support of Order of Publication filed December 23, 2019
  - a. Exh. A – Person Search
5. Motion for Publication filed December 23, 2019
6. Letter to Sun Trust re: service d. December 30, 2019
7. Letter to Sun Trust re: service with PS Form 3800 d. December 30, 2019
8. Letter to Sun re: service d. December 30, 2019
9. Letter to Sun re: service with PS Form 3800 d. December 30, 2019
10. Certificate of Service for Publication Motion package sent and filed December 23, 2019
11. Letter to sheriff re: service in court before Judge Jefferson dated January 6, 2020 filed
12. 

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Affidavit of Non-Service filed January 14, 2020 as to Appellant Trust

- a. Exh. A – December 30, 2019 service to PO Box returned “Refused” with envelope image
  - b. Exh. B – December 30, 2019 service to Property via FedEx tracking signed by A. Sun
  - c. Exh. C – December 30, 2019 service to Property via FedEx returned “Refused: DO NOT WANT PKG” with envelope image
13. Affidavit of Non-Service filed January 20, 2020 as to Appellant Sun
    - a. Exh. A - December 30, 2019 service to PO Box via Certified Mail returned “Refused” with envelope image
    - b. Exh. B – December 30, 2019 service to Property via FedEx tracking signed by A. Sun
    - c. Exh. C – December 30, 2019 service to Property via FedEx returned “Refused: DO NOT WANT PKG” with envelope image
  14. Amended Affidavit in Support of Order for Publication filed January 24, 2020
  15. Certificate of Service – Amended Affidavit in Support of publication filed January 27, 2020
  16. Order for Publication filed January 31, 2020
  17. Certificate of Mailing for Order of Publication filed February 12, 2020
  18. Certificate of Mailing – Summon for Publication and Notice of Filing filed February 26, 2020
  19. Island Packet Affidavit of publication filed March 18, 2020
  20. Certificate of Mailing – Summon for Publication and Notice of Filing dated May 28, 2020
  21. Affidavit of Default filed June 5, 2020
  22. Order of Default and Reference filed June 5, 2020
  23. Notice of Hearing dated and filed June 17, 2020
  24. Certificate of Service for Notice of Hearing dated and filed June 18, 2020
  25. Defendant’s Answer and Counterclaim filed July 13, 2020
    - a. Clerk’s Image of Envelope
  26. Affidavit of Attorney fees, Costs and Expenses filed July 13, 2020
  27. Verified Statement and Affidavit of Debt filed July 13, 2020
    - a. Exh. A – Account Statement
  28. Certificate of Service – Verified Statement and Affidavit of Debt, Affidavit of Attorney Fees, etc. dated July 13, 2020 and filed July 14, 2020
  29. Affidavit of Scott Wild filed July 15, 2020
    - a. Exh. 1 – PS Form 3800 for 12.30.19 service Attempt
    - b. Exh. 2 – Certificate of Service for Amended Affidavit in Support of Publication with images of returned envelopes
    - c. Exh. 3 – Letter and corresponding Certificate of Mailing for Order of Publication filed 2.11.20 with images of returned envelopes with PS Form 3811
    - d. Exh. 4 - Certificate of Mailing for Summons for Publication and Notice of Filing filed 2.26.20 with images of returned FedEx
  30. Waiver of Deficiency Judgment dated and filed July 17, 2020
  31. Hearing Transcript of July 17, 2020: p.4, ll.21-22; p.5, ll.2-5; p.8, ll.24-25; p.9, ll.1-3, 10-12, 22-25; p.10, ll.1-2; p.12, ll.9-16, 22-25; p.13, ll.1-5; p.16, ll.2-5, 9-11, 15-25; p.17; p. 19, ll.6-10, 22-25; p.20, ll.1-3; p.22, ll.2-25; p.23; p.24; p.25, ll.1-24; p.28, ll.19-25; p.29,

- ll.1-7; p.38, ll.4-7; p.41, ll.21-25; p.42, ll.1-8; p.49, ll.7-11; p.51, ll.11-14; p.53, ll.16-22; p.57, ll.13-18; p.58, ll.2-10; p.59, ll.3-13; p. 61, ll.12-14
32. Verification of Answer and Counterclaim filed July 20, 2020
  33. Hearing Transcript of August 4, 2020: p.4; p.8, ll.4-17; p.16, ll.2-6, 14-19, 22-23; p.25, ll.10-15; p.37, ll.23-25; p.39, ll.19-25; p.40, ll.1-9, 22-23; p.41, ll.2-5; p.42, l.5; p.43, ll.8-18; p.46, ll.4-7; p.48, ll.19-25; p.52; p.53, ll.1-4; p.61, ll.4-8; p.81, ll.12-22; p.82-83; p.84, ll.1-22; p.91, ll.12-14; p.92, ll.23-25; p.93, ll.1-2; p.96, ll.22-25; p.97, ll.13-16; p.98, ll.9-10
  34. Motion for Permanent Injunction and/or Temporary Restraining Order filed August 5, 2020
  35. Motion to Open & Set Aside Default filed August 7, 2020
  36. Supplement to Motion to Open & Set Aside Default filed December 14, 2020
  37. Affidavit of Joseph Sun filed December 16, 2020 (with Exhibits)
  38. Objection to Plaintiff's Proposed Master's Decree/Foreclosure, Sale & Judgment filed December 31, 2020
  39. Master's Decree of Foreclosure, Sale & Judgment filed January 13, 2021 and Form 4
  40. Motion to Reconsider filed January 25, 2021
  41. Motion for Order Compelling Discovery filed January 27, 2021
  42. Supplement to Motion to Reconsider filed February 1, 2021
  43. Hearing Transcript of February 18, 2021: p.6, ll.12-14; p.7, ll.18-20; p.30, ll.5-15; p.44, ll.10-12; p.46, ll.2-9; p.46, ll.12-20; 47, ll.23-25
  44. Second Supplement to Motion to Reconsider filed March 8, 2021
  45. Form 4 Order denying Motion to Reconsider filed April 7, 2021
  46. Notice of Appeal on Orders of April 7, 2021 and January 13, 2021 filed April 20, 2021
  47. Formal Objection to the Circuit Court on Sufficiency of Sureties and Partial Return on Motion for Consideration of Already filed Petition for Writ of Mandamus filed April 30, 2021

I certify that this designation contains no matter which is irrelevant to this appeal.

**LAW OFFICE OF SCOTT M. WILD, LLC**

s/Scott Wild

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*Attorney for Respondent*

This 18<sup>th</sup> day of January, 2022,

Hilton Head Island, Beaufort County, South Carolina.