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JAN 27 2022

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

**SC Court of Appeals**

**APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas**

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

**Appeal Case No. 2021-000434  
Circuit Court Case No. 2019CP0702178**

**JOSEPH CHAKYING SUN, Individually  
and JOSEPH CHAKYING SUN, as Trustee  
of The 2009 Sun's Family Trust in  
South Carolina, USA**

..... **Appellant**

**v.**

**BLUFFTON PARK COMMUNITY  
OWNERS' ASSOCIATION, INC.**

..... **Respondent**

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**MOTION FOR VARIOUS RELIEF**

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APPELLANTS JOSEPH SUN and The 2009 Sun's Family Trust herein, move the court for the following reliefs:

1. Extension of Time to file Appellant's Final Brief and Record on Appeal.

After several lengthy extension of time by the respondent since June 2021, when it was served with Appellant's initial brief, its respondent brief was finally filed on January 18, 2022. Appellant is a 75 year old man retiring on a small social security check every month. He is suffering several major medical problems. The primary one is spinal stenosis requiring surgery on his spine. He has requested the doctors to postpone any operation until after he filed and served

his final brief and record on appeal.

For many days last month, Appellant could not walk in his home and had to stay in bed a lot of time. He has other medical problems of high blood pressure and sugar causing any surgery to be more difficult and risky. In addition, he is appearing pro se without the benefit of counsel. During this time of the pandemic, even after the total lock down was lifted, Appellant cannot drive on his own to get legal references or make copies. Most law libraries are only open on reduced schedules. Appellant cannot prepare any legal documents expeditiously like a lawyer.

Wherefore, Appellant prays the court for an extension of 60 days for him to serve and file all remaining briefs and the record on appeal.

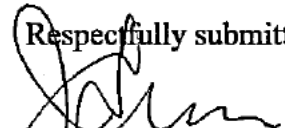
2. For the reasons already aforesaid, Appellant requests the court to allow him to serve all his remaining documents in this case on the respondent electronically through email and file only one copy of the briefs and record on appeal.

3. Appellant further requests the court to accept all his remaining briefs and record on appeal for filing without the requirement of binding and special folders. Appellant will prepare and file all his documents in plain paper pursuant to the specifications, forms and contents as specified in the S.C.A.C.R.

4. ~~Appellant recently discovered from Respondent's Initial Brief that the transcript of hearing on July 17, 2020 was erroneously labeled for July 16, 2020 in the Beaufort County Public Index therefore he has to get the additional transcript which will take about two weeks.~~

Wherefore, Appellant prays the court to grant his aforesaid requests.

This 26<sup>th</sup> day of January, 2022.

Respectfully submitted,  
  
JOSEPH C. SUN, pro se  
843-226-8788

**PROOF OF SERVICE**

I certify that I have this date served the foregoing Appellant's Motion on Respondents counsel by depositing a copy of same in the U.S. Mail postage prepaid to:

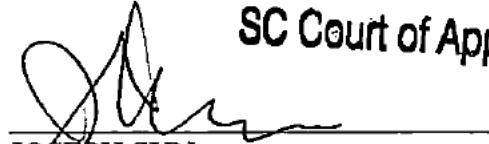
Scott M. Wild, Esq.  
P. O. Box 6867  
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email: scott@wildlawfirm.com

This 26th day of January, 2022

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Clerk of Court

South Carolina Court of Appeals

P. O. Box 11629

Columbia, SC 29211

**SC Court of Appeals**

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