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Jan 31 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

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

Appeal Case No. 2021-000434

JOSEPH CHAKYING SUN, as Trustee of The 2009 Sun’s  
Family Trust in South Carolina, USA; Joseph Chakyong  
Sun, Individually, Liling Sun n/k/a Liling Walsh; Oleysa  
Matyushevsky; Christine Varg; and Citizens Opposed to  
Domestic Abuse, of whom Joseph Chakyong Sun,  
as Trustee of The 2009 Sun’s Family Trust in South Carolina, USA  
and Joseph Chakyong Sun, Individually is the Appellant ..... Appellants

v.

BLUFFTON PARK COMMUNITY  
OWNERS’ ASSOCIATION, INC. .... Respondent

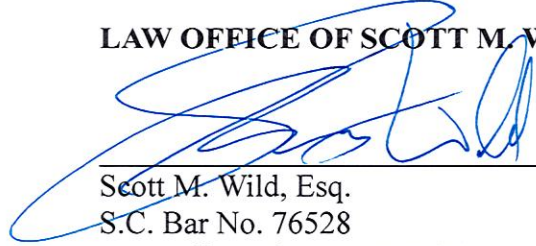
MOTION TO AMEND RESPONDENT’S INITIAL BRIEF

Respondent Bluffton Park Community Owners’ Association, Inc., hereby moves the court  
to amend Respondent’s Initial Brief, as follows:

1. To the Table of Authorities, add:
  - a. *Wachovia Bank of S.C., N.A. v. Player*, 341 S.C. 424, 429, 535 S.E.2d 128, 130 (2000) at Page 9;
  - b. *Mortgage Recovery Fund – Riverbend v. Heritage Clipper Riverbend Trust*, 327 S.C. 491, 489 S.E.2d 655 (Ct.App 1997) at Page 10 – 11;
  - c. *Donel, Inc. v. Badalian*, 87 Cal.App.3d 327 (Ct.App. 1978) at Page 14;
  - d. *Tucker v. Doe*, 413 S.C. 389, 404, 776 S.E.2d. 121, 129-30 (Ct.App 2015) at Page 23;

2. To the non-Arabic numbered pages, correct the pagination to reflect a duplication and also account for newly-listed authorities.
3. No changes are substantive.

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



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Scott M. Wild, Esq.

S.C. Bar No. 76528

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Hilton Head Island, SC 29938

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*Attorney for Respondent*

This 31<sup>st</sup> day of January, 2022,

Hilton Head Island, Beaufort County, South Carolina.

**RECEIVED**

**Jan 31 2022**

**SC Court of Appeals**

**STATE OF SOUTH CAROLINA  
In The Supreme Court**

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

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

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**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; Oleya 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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I, Tracy L. Thornton, hereby certify that on this day I mailed one (1) un-filed copy of the Motion to Amend Respondent's Initial Brief by depositing the same at the United States Post Office, Hilton Head Island, South Carolina, with first class postage prepaid to:

Joseph Chakyng Sun and  
The 2009 Sun's Family Trust  
in South Carolina, USA  
c/o Joseph Chakyng Sun, Trustee  
18 Sixth Avenue  
Bluffton, SC 29910

Joseph Chakyng Sun and  
The 2009 Sun's Family Trust  
in South Carolina, USA  
c/o Joseph Chakyng Sun, Trustee  
P.O. Box 2543  
Bluffton, SC 29910

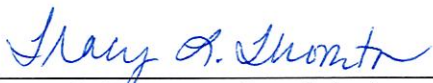
Joseph Chakyng Sun and  
The 2009 Sun's Family Trust  
in South Carolina, USA  
c/o Joseph Chakyng Sun, Trustee  
43 Broadview Drive  
Ridgeland, SC 29936

Additionally, a copy of the same was served by scanned electronic attachment on January 31, 2022 to Joseph Sun and The 2009 Sun's Family Trust in South Carolina, USA to [jossunn1095@yahoo.com](mailto:jossunn1095@yahoo.com).

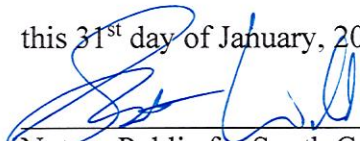
Further, a copy of the same was submitted for filing with the South Carolina Court of Appeals via scanned electronic attachment to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted this 31<sup>st</sup> day of January, 2022, in the Town of Hilton Head Island, Beaufort County, South Carolina.

**LAW OFFICE OF SCOTT M. WILD, L.L.C.**

By:   
Tracy L. Thornton, Legal Assistant  
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*Attorney for the Respondent*

Sworn to and subscribed before me on  
this 31<sup>st</sup> day of January, 2022.

  
Notary Public for South Carolina

My Commission Expires: 2-8-28