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May 24 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The 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**

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, Appellants.

**APPELLANT'S SUPPLEMENTAL RESPONSE TO RESPONDENT'S
MOTION TO STRIKE BRIEF OF APPELLANT**

On March 22, 2022 Appellant filed and served his motion to amend his Initial Brief and designation of Matters. On March 31, 2022 due to lack of response from the respondent, the court granted Appellants' motion to amend and instructed Appellants to serve their amended initial brief and designation of matter. (See attached Order 3/31) On April 1, 2022, respondent electronically filed its belated opposition to Appellant's motion without any service on the Appellant. Court record shows there was no certificate of service of respondent's belated opposition therefore respondent's document should not even be considered.

Appellants filed and served their amended initial brief and designation of matter on April 11, 2022. Having read respondent's belated opposition on the court's C-Track Public Access,

Appellant mailed in his reply to respondent's objection showing why Appellant's Amended Initial Brief could have no delay or prejudice.¹ Respondent continued its baseless attack by filing a motion to strike Appellant's Brief on April 18, 2022. It is important to take judicial notice that Appellant was working on a tight schedule pursuant to this court's Order of March 10, 2022 sent to both the Appellant and Respondent.² (Copy Order of 3/10 attached.)

After Appellant served and filed his Amended Initial brief and Designation of Matter, this court seems to put this appeal case on hold until decision of respondent's motion to strike. Appellants filed and served their Final Brief with all the page references pursuant to SCACR, Rule 208 and Rule 211. Appellants have not caused any delays. The Appellants' briefs were served and filed pursuant to Court Order of March 10, 2022 and the South Carolina Appellate Court Rule.

Wherefore, respondent's motion to strike should be denied.

Respectfully submitted,

This 23rd day of May, 2022.

J. C. Sun

JOSEPH C. SUN, pro se
P. O. Box 2543
Bluffton, SC 29910
843-304-0314

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CERTIFICATE OF SERVICE

This is to certify that I have this date served the Respondent a copy of Appellant's Supplemental Response to its motion to strike, by sending a copy of same to:

Scott M. Wild, Esq. P. O. Box 6867, Hilton Head Island, SC 29938
and by email to: scott@wildlawfirm.com

This 23rd day of May 2022.

J. C. Sun

JOSEPH C. SUN

¹ Appellant has not made any change on the Issues on Appeal, only made some clarifications and typographical corrections in the amended initial brief and the addition of Standard of Review.

² Appellant in his motion to amend his initial brief already explained that he had difficulty paying for all his transcripts prior to the deadline to serve and file his initial brief, therefore, an amendment was necessary on his initial brief and designation of matter after he received his copy of the transcripts.

ATTACHMENTS