
UNITED STATES DISTRICT COURT

for the

District of South Carolina

XIAODAN LI

Plaintiff(s)

v.

CALVIN HOAGLAND AND CATHERINE
HOAGLAND

Defendant(s)

Civil Action No. 9:25-cv-12669-BHH

MOTION FOR TO DISMISS WITH PREJUDICE

AND FOR SANCTIONS AND COSTS

PLEASE TAKE NOTICE that the Defendant, Catherine Hoagland, , by and through her undersigned attorney, hereby moves the Court, pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure, for an order granting the Motion to Dismiss in favor of the Plaintiff. This Motion is on the basis that there is a failure to state a claim for which relief can be granted, no genuine issue as to any material fact and this is a frivolous lawsuit against her. The Plaintiff is entitled to judgment as a matter of law and this action was filed against the Defendant, Catherine Hoagland (hereinafter Catherine) with no plausible claim or meritorious claim for which relief can be granted.

This Motion will be based upon the pleadings as they read, at a hearing, affidavits, exhibits and memorandum may be provided. There is no claim for relief against the Defendant Catherine, nor a plausible claim set out against her.

BACKGROUND

The Defendant, Catherine Hoagland, by and through her undersigned attorney reserves right Answer and Counterclaim or otherwise Plead to the Complaint and requests an extension to further Answer the Complaint. She is first seeking to have it dismissed, if necessary. Catherine is informed the Action should be dismissed as there is no claim by the Plaintiff that is legitimately asserted against her as an individual defendant. relative to this matter that would be applicable.

Catherine is informed and believe each Defendants (both she and her husband, 77 year old Calvin “Skip” Hoagland are being harassed and abused by this litigation that has no merit and is to harass and retaliate against them to attempt to threaten them in by a sitting leaders in the Beaufort County Republican Party, the Plaintiff Xiaodan Li holds a public office and has retaliate

toward the Defendant Calvin Hoagland frequently and with malice. Catherine has not engaged in any communications with Xiaodan Li to rise to the level of this Plaintiff including Catherine in this lawsuit. She is informed this is politically motivated and an abuse of the legal process. The Complaint is vague on its face and only sets out speculation and doesn't properly plead any causes of action against Catherine.

That the Defendant, Catherine is 66 years old, has recently had some medical issues which caused her to be late in responding and obtaining her own lawyer. She relied on her Pro Se Husband to respond, which he in fact did timely respond and she was not served separate Interrogatories. She objects to the Motion filed by Plaintiff to seek a Default Judgment against her and believes that would be extremely unfair, is in violation of Rule 11 and is overreaching under the totality of circumstances. She is informed that Mr. Greg Alford is aware she intended to defend this court action. She has a medical condition she was experiencing during this time, as well as was actively seeking an attorney to defend this litigation.

That Defendant is informed that Xiaodan Li resides in Beaufort County with her Husband, Matt Sweeney who presently sits of the Beaufort County Election Board. She is a long-time political activist. She has leadership roles in both the Beaufort County Republican Party (BCRP) and the South Carolina Republican Party (SCGOP).. In most of the allegations that the Plaintiff set out she is clearly operating in her official capacity in one or all of the following entities: BCRP, SCGOP or Friends for Liberty which "co-hosts" events with BCRP and was set up in 2021-22 bringing in local and statewide politicians, including local sheriff, state representatives and local government officials, as well as statewide and US congress politicians whom she has influence. She is known to collaborate with these politicians to influence reforms, she believes are important, in South Carolina. Over the years there is a pattern of favoritism by Plaintiff and her various entities and a complete shut out of those who share other opinions counter to the Plaintiff and her entities she leads. She is known for passing the "Beaufort Bill" legislation she helped, using her three referenced entity positions to draft and influence a fast-tracked law promoting election machines and other particulars dealing with election law in South Carolina in 2022.

The Defendant Catherine is informed that Xiaodan Li by her own admission has stated to the public that she was born and raised in mainland China, graduated from Wellesley College and obtained an MBA from Columbia University, she began her career in Goldman Sachs as an investment banker, advising multinational corporations and institutions for cross border mergers and acquisition transactions. She is informed Xiaodan Li is often a speaker locally speaking about Chinese takeover of Hong Kong and the threat to Taiwan of a Chinese invasion. This information comes from her own admission set out on a Rotary Club meeting notice dated on August 26, 2021. Since that date she has been a very active public speaker on these issues and other politically driven issues.

GENERAL DENIAL

1. That the Defendant, Catherine, is informed and believes that the Plaintiff has brought this action for ulterior motives and improper purpose of seeking to punish Defendant for exercising her right to attempt to join the Beaufort County Republican Party. Also, she is apparently seeking a windfall, without properly pleading specific damages to her by Catherine. The Plaintiff and her board denied both Catherine and Calvin Hoagland membership to the BCRP and returned the checks, with no legitimate reason to deny Catherine membership. The BCGOP and Xioadan Li returned the check and has engaged in this lawsuit to retaliate against the Defendant Catherine. Xioadan Li and others has also had the Defendant Skip arrested using her position of power in the local politics which also has been apparently retaliatory and politically motivated. The Plaintiff was the lead witness to testify against Mr. Hoagland in a magistrate court action. Catherine had nothing to do with any of these issues.
2. She is informed that this litigation is to engage in Lawfare and to attempt to bootstrap in other civil cases, Mr. Greg Alford has filed against Defendant Calvin Hoagland. She is informed any Motions by Plaintiff for default are premature and she objects to said Motion or Relief.
3. That the Defendant, Catherine, is informed and believes the initiation of this action by the Plaintiff's constitutes a willful and intentional act not proper in the requisite filing of a case to include Catherine Hoagland. Plaintiff's 28-page Complaint contains only conclusory allegations and legal labels devoid of factual content. Even accepting all well-pleaded facts as true and drawing all reasonable inferences in Plaintiff's favor, the Complaint fails to nudge any claim "across the line from conceivable to plausible." *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007).
4. That the Defendant, Catherine, is informed and believes that such action constitutes an abuse of process and are primarily to promote the Plaintiff's ulterior purpose to gain objectives not legitimate in the use of the legal process, specifically to infringe upon, punish and deter Defendant 's exercise of her rights.
5. The Plaintiff, acting with others, to bring this improper action against the Defendant has caused and is causing the Defendant injury and damages. Specifically, the Plaintiff has and is causing injury and special damages to the Defendant, Catherine reputation and good will. Accordingly, the initiation of this and pursuit of this legal action by Plaintiff constitutes a civil conspiracy. Catherine is informed and believes this case should be dismissed as to her before further damages arise to her reputation and good

will.

6. That the Defendant, Catherine, is informed and believes that the Plaintiff instituted this action against the Defendant with malice and without filing a Complaint supported by a plausible claim against Catherine as set out under *Ashcroft v. Iqbal*, 556 U.S. 662 (2009). The Plaintiffs' unfounded claim against Defendant will be terminated in favor of Defendant. Additionally, this unjustified action continuously causes Catherine significant injury by attempting to malign her in the public through the legal process and to deter and punish her for exercise of her rights. Accordingly, pursuit of this action by the Plaintiff(s) constitutes a wrongful institution of civil proceedings and malicious prosecution.
7. That the Defendant, Catherine, is informed and believes that the Plaintiff should be held responsible for damages for all injury proximately caused to Defendant Catherine by the initiation and pursuit of this action, including all attorney fees, costs, litigation expenses and related expenses and damages to goodwill and reputation.
8. The Defendants are informed and believes that the Plaintiff's conduct is willful and malicious and punitive damages should be awarded against her and anyone who knowingly is assisting him in the pursuit of this litigation.
9. That Defendant Catherine, without waiving her Motion to Dismiss, denies allegations 1- 1-46 and denies same as to her and demands strict proof thereof. She is informed these allegations are not true as to her and requests immediate dismissal of her as a Defendant. She is informed the "disclosures" of the Plaintiff are untrue and that she is in fact acting and operating in her official capacity as a leader in the Beaufort County Republican party and is engaging in retaliation lawfare for political gain.
10. Defendant reserves right to demand a jury trial as to all issues, file additional Motions for Relief, seek extensions based on medical reasons she is experiencing and seek leave to Answer and Counterclaim.
11. Wherefore, having responded to the Complaint of the Plaintiff by a 12 B 6 Motion and reserved right to file an Answer and counterclaims thereto, Defendants Catherine prays that the Court dismiss the Complaint of the Plaintiff with attorney fees and costs, enter a judgment against the Plaintiff for actual damages on the Counterclaim's and enter judgment for such punitive damages as are awarded on the Counterclaims, and that the Court enter such other and further relief as may be just and proper.

This 24th of November 2025

Respectfully Submitted

S/ Lauren L Martel

Lauren L. Martel
243 Club Gate
Bluffton, South Carolina 29910
843-298-3831

Verification: I have read this Motion to Dismiss, and it is true and accurate to the best of my knowledge:

S/Catherine Hoagland
Catherine Hoagland

This 24th Day of November 2025