



MOTION TO STRIKE RETURN TO MOTION FILED FEBRUARY 14TH 2023 CCY.

Vanessa S. Richardson El
Appellant

vs.

DITECH FINANCIAL, LLC
Respondent



From the Charleston County Court of Common Pleas.

Date: Feb 21st, 2023 ccy

To the Appeals Court of the State of South Carolina:

In this cause, real party in interest, beneficiary and true owner Vanessa Richardson El hereby moves the Court to strike the ultra vires return to motion to reinstate entered into the docket on Feb 14th, 2023 ccy by Chad Wilson Burgess for lack of privity. There's no evidence that the filer has any interest, connectivity or privity to the subject matter of the suit.

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Feb 28 2023

SC Court of Appeals

Respectfully submitted,

Autograph without prejudice & recourse

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Vanessa Richardson El, private American national, privately domiciling within a private non-military estate, beneficiary, real party in interest, grantee, grantor/settlor, true owner

Non-Domestic Mail in care of:

PO Box 22591

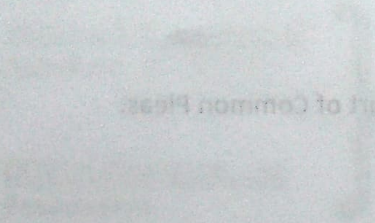
Charleston, South Carolina Republic *(zip exempt)*

North Amexem (America) A.R.R.

chakoramooors@gmail.com

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MOTION TO STRIKE RETURN TO MOTION FILED FEBRUARY 14, 2023 CCY



Date: Feb 21, 2023 ccy

Vanessa J. Richardson E.I.
Appellant
vs.
DITCH FINANCIAL, LLC
Respondent

To the Appeals Court of the State of South Carolina:

In this cause, real party in interest, beneficiary and true owner Vanessa Richardson E.I. hereby moves the Court to strike the ultra vires return to motion to reinstate entered into the docket on Feb 14th, 2023 ccy by Chad Wilson Burgess for lack of privity. There's no evidence that the filer has any interest, connectivity or privity to the subject matter of the suit.

Respectfully submitted,

Handwritten signature of Vanessa J. Richardson E.I.

Vanessa J. Richardson E.I. Private American
national, privately domiciled within a private
non-military estate, beneficiary, real party in
interest, grantee, executor, true owner
Non-Domestic Mail in care of:
PO Box 22991
Charleston, South Carolina Republic of America
North America (America) A.R.L.
charlesamoores@gmail.com



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Feb 28 2023

SC Court of Appeals



AFFIDAVIT IN SUPPORT OF MOTION TO STRIKE RETURN TO MOTION.

Vanessa S. Richardson EI
Appellant

vs.

DITECH FINANCIAL, LLC
Respondent



From the Charleston County Court of Common Pleas.

Date: Feb 21st, 2023 ccy

I, Vanessa Richardson EI, beneficiary, real party in interest, private American national, privately domiciling at all times within a non-military occupied private estate located outside a "Federal District" not subject to the jurisdiction of the "United States," within the South Carolina state Republic, grant personam and subject matter jurisdiction to the Court in this cause for the purpose of adjudication per Article 3 Section 2 Clause 1 of the Constitution for the united states of America ratified 1791 CCY under the rules of exclusive Equity and its body of Maxims and Jurisprudence; and hereby make Oath and affirm that the statements within this affidavit hereafter are true of my own knowledge, except as to the matters therein stated to be on information and belief, and these matters I believe to be true:

1. Whereas no evidence appears on the face of the record giving privity or connectivity of the filer of this return to motion to reinstate and I believe no such evidence exists;
2. Whereas the return to motion has no signature by any real party in interest;
3. Whereas by the record of the South Carolina Secretary of State, Chad Wilson Burgess does not represent ~~any~~ real party in interest by the respondent's charter;
4. Whereas Chad Wilson Burgess is not a party to the suit;

Handwritten signature

Handwritten signature

AFFIDAVIT IN SUPPORT OF MOTION TO STRIKE RETURN TO MOTION

Vanessa S. Richardson, Et
 Appellant
 vs.
 DITECH FINANCIAL, LLC
 Respondent

From the Charleston County Court of Common Pleas

Date: Feb 21, 2023 ccy

I, Vanessa Richardson Et, beneficiary, real party in interest, private American national, privately domiciling at all times within a non-military occupied private estate located outside a "Federal District" not subject to the jurisdiction of the "United States," within the South Carolina state Republic, grant personam and subject matter jurisdiction to the Court in this cause for the purpose of adjudication per Article 3 Section 2 Clause 1 of the Constitution for the united states of America entitled 1791 CCY under the rules of exclusive Equity and its body of Maxims and Jurisprudence, and hereby make Oath and affirm that the statements within this affidavit hereafter are true to my own knowledge except as to the matters therein stated to be on information and belief, and those matters I believe to be true.

1. Whereas no evidence appears on the face of the record giving privity or connectivity of the filer of this return to motion to reinstatae and I believe no such evidence exists;
2. Whereas the return to motion has no signature by any real party in interest;
3. Whereas by the record of the South Carolina Secretary of State, Chad Wilson Burgess does not represent the real party in interest by the respondent's claim;

Whereas Chad Wilson Burgess is not a party to the suit;



Handwritten text: 2-21-23

3-21-23/14



5. Real party in interest and beneficiary Vanessa Richardson EI submits this Affidavit In Support Of Motion To Strike Return To Motion To Reinstate for lack of privity.

FURTHER AFFIANT SAYETH NAUGHT.

Vanessa Richardson EI

Richardson EI, Vanessa, private American citizen privately domiciling within a private non-military estate, beneficiary, true owner, real party in interest. All Rights Reserved, Without Prejudice or Recourse
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The United States of America

The State of South Carolina
The County of Charleston

Subscribed and Affirmed Notary Public Acknowledgment

BE IT KNOWN, that on the 26th Day of February Two Thousand Twenty Three before me, Brandon Eney Notary Public by said State, duly authorized, empowered and

admitted to take acknowledgments, came by special limited restricted ministerial visitation Vanessa Richardson EI, within named, personally known by me, and acknowledged the above "Affidavit in Support of Motion To Strike Return" to be her freewill act and Deed for the uses and purposes therein expressed. IN TESTIMONY whereof I have hereunto set my Hand and Seal this Day and Year last aforesaid.

[Signature]
Notary Public - signature

My commission expires: June 7th 2028

BRANDON ENEY
Notary Public-State of South Carolina
My Commission Expires
June 07, 2028

2. Real party in interest and beneficiary Vanessa Richardson EI submits this Affidavit in

Support Of Motion To Strike Return To Motion To Reinstate for lack of privity.

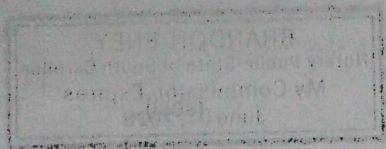
FURTHER AFFIANT SAYETH NAUGHT.

Richardson EI, Vanessa, private American citizen
privately domiciled within a private non-military estate,
beneficiary, true owner, real party in interest. All Rights
Reserved, Without Prejudice or Recourse
GAAZ7889-GAAZ08318-GAAZ32141

The United States of America
 The State of South Carolina
 The County of Charleston
 BE IT KNOWN, that on the 10th Day of February,
 Notary Public said State, duly authorized, empowered and
 admitted to take acknowledgments, came by special limited restricted ministerial visitation Vanessa
 Richardson EI, within named, personally known by me, and acknowledged the above Affidavit in
 Support of Motion To Strike Return to be her lawful act and deed for the uses and purposes therein
 expressed. IN TESTIMONY whereof I have hereunto set my Hand and Seal this Day and Year first
 stated.

Notary Public - signature
 My commission expires June 7, 2028

Subscribed and Affirmed - Notary Public - Acknowledgment
 Two thousand two hundred twenty three before me.



2-21-2021
M. A. M. M. M.

Table of Authorities

Holy Koran Surah As shu'araa' (26), Aayat 181-184
Geneva Bible 1599 Psalms 17:2
Equity Jurisprudence Vol. I-V 1905 By John Norton Pomeroy, Jr.
Suits In Chancery 2nd Edition 1907 By Henry R. Gibson
A Practical Treatise On The Law Of Trusts Vol. I-II 8th Ed. 1888 By Frederick Albert Lewin
A Treatise On The Law Of Trusts And Trustees, By Jairus Ware Perry 1872
Gilbert's Law Summaries: Trusts 13th Ed. 2007 By Edward C. Hallbach, Jr.
A Treatise On Conveyancing & The Law Of Merger, Vol. III By Richard Preston 1829
Commentaries On Equity Pleadings 10th Ed. 1892 By Joseph Story
General Rules of the Supreme Court of the United States 1884 Samuel A. Blatchford

Maxims of Equity

Equity Regards Done What Ought To Be Done.
Equity Shall Not Suffer A Wrong To Be Without A Remedy.
Equity Acts Specifically, And Not By Way Of Compensation.
Equity Chancery Has Jurisdiction For One Purpose, It Will Take Jurisdiction For All Purposes.
Equity Delights In Equality.
Equity Imputes An Intent To Fulfill An Obligation.
Equity Delights To Do Complete Justice, And Not By Halves.
Equity Acts In Personam.
Equity Abhors A Forfeiture.
Equity Does Not Require An Idle Gesture.
Equity Shall Take Jurisdiction To Avoid A Multiplicity Of Suits.
Equity Follows The Law.
Equity Shall Not Allow A Statute To Be Used As A Cloak For Fraud.
Equity Will Undo What Fraud Has Done.
Equity Shall Not Allow A Trust To Fail For Want Of A Trustee.
Equity Looks To The Intent Rather Than To The Form.
Equity Requires Diligence, Clean Hands And Good Faith.
Equity Regards The Beneficiary As The Real Owner.
Equity Will Not Aid A Volunteer.
Equity Will Not Perfect An Imperfect Gift.
Equity Comes To The Aid Of The Legally Disabled.
Superior Equity Shall Always Prevail; Where There Are Equal Equities The Law Shall Prevail, Otherwise Priority Shall Prevail.
Haerodem Deusfacit, non homo. God and not man, make the heir.
Haeres est eadem persona cum antecessore. The heir is the same person with the ancestor.
In restitutionem, non in paenam haeres succedit. The heir succeeds to the restitution not the penalty.
The heir and his ancestor are one and the same person. That is, one in right, the heir succeeding to the rights of his ancestor, just as the king never dies.

M. A. M. M. M.

Table of Authorities

Holy Quran Surah As Shuraa (28), Aaya 181-184
 Geneva Bible 1599 Psalm 17:2
 Equity Jurisdiction Vol. I-V 1905 By John Norton Pomeroy, Jr.
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2-21-2024



2-21-23 CCR



Private

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Feb 28 2023

SC Court of Appeals

Priority

Special

Case: 2022-000660

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2-21-23

