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THE STATE OF SOUTH CAROLINA

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In The Court of Appeals

APR 10 2023

Benita Dinkins-Robinson, Appellant,

SC Court of Appeals

v.

Alan Ratner, Respondent

Appellate Case No. 2019-000131

Appeal From Lee County Kristi F. Curtis,

Motion to Reconsider And Request for Oral Arguments

Circuit Court Judge Unpublished Opinion No. 2023-UP-094 Submitted February 1, 2023 – Filed March 15, 2023

The Plaintiff just received the order that was Written on March 15, 2023 on April 3, 2023.

We hereby request that this court reconsider and review the main issues at hand.

Part 1

1. The defendant filed foreclosure on December 14, 2014 and had a foreclosure sale on December 15, 2015
2. By evidence submitted and presented in the transcript and the special referee report the plaintiff was not served a Notice of the Sale.
3. The defendant alleges in his "Answer" which is in the record of Appeal that he served the plaintiff's previous attorney, thus admitting to **NOT** serving the Plaintiff(s).
4. In **All legal proceedings** according to South Carolina on Civil Proceedings, all Parties must be served. T
5. he Notice of Sale is a legal proceeding, thus should have been served on the Plaintiff (s).

6. Making the foreclosure sale in itself illegal for lack of service.
7. Even with that being the case, this illegal sale still went forth.
8. The defendant purchased the property at the sale.
9. At that **POINT IS WHEN EVERYTHING SPIRALED.**
10. The defendant then took immediate possession of the property barring the plaintiff from obtaining her \$2,000,000 worth of property which is fully outlined throughout the record of appeal.
11. The defendant did not as require before obtaining possession of the said property for a "Motion to Vacate".
12. After the Notice to Vacate, then the defendant should have began legal eviction proceedings in toward the Plaintiff.
13. Not look her out and "Steal", High Jacking all her belongings.
14. Right is Right and Wrong is Wrong.
15. No owner/landlord can just "steal" its tenants property.
16. This case is not solely about the foreclosure proceeding, but the **More about the defendant hijacking the plaintiff's belonging that was inside the building after he can possession.**
17. The belongings as outlined in the records were worth over \$2,000,000.00
18. **So the question clearly is can a landlord owner take their tenants property without allowing them to remove their property?**
19. **Furthermore the question sis can a landlord/owner force eviction or do they have to fo through proper procedures.**
20. Hand the Lower Court allowed the proceedings to go forth than a jury would have determine this case.

21. All of these issues are outlined in the Record on Appeal.

Part 2


1. The court alleges that it is the judge's discretion to allow the plaintiff to be legally represented, I respectfully ask this court to revisit this law and see if it is constitutional or should all parties in every legal proceedings not just criminal be afforded legal representation, especially when the opposing parties has a licensed attorney.
2. It is like a puppy fighting a bear, and we all now that the bear will win every time.
3. There should be no injustice on any level.

Part 3.

1. The question of Conflict of Interest was raised but ignored at the lower court.
2. The fact of the matter is the opposing attorney represent the Plaintiff since she was 18 years of age.
3. He was her family and her personal attorney for years.
4. The opposing counsel also represented the business "Project Reach" on several properties that was purchased. This was also included in the record.
5. He even admitted he represented her, so for him to represent another against her is clearly a conflict of interest.
6. The opposing counsel is also the Master of Equity for that County so he respectfully knows that all of this proceeds for illegal.

We again ask this court to remand that case back to lower court and allow for the plaintiff to proceeded with a "Jury Trial".

Respectfully Submitted



Benita Robinson



Lee County

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Third Judicial Circuit

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Allan J. Ratner VS Project Reach Ministries

Case Number:	2014CP3100253	Court Agency:	Common Pleas	Filed Date:	10/01/2014
Case Type:	Common Pleas	Case Sub Type:	Foreclosure 420	File Type:	Non-Jury
Status:	Judgment	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Judgment	Disposition Date:	06/09/2015	Disposition Judge:	Solicitor
Original Source Doc:		Original Case #:			
Judgment Number:	2014CP3100253	Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Ratner, Allan J.	Special Referee/Report of Sale	Filing		03/07/2016-12:42		
Ratner, Allan J.	Order/Forfeiture Deposit and Scheduling a New Sales Date	Order		11/19/2015-13:07		
Project Reach Ministries	Notice/Notice of Appeal	Filing		07/02/2015-12:25		
Project Reach Ministries	Notice/Notice of Contested Hearing	Filing		07/02/2015-12:24		
Project Reach Ministries	Notice/Notice to Vacate Judgment	Filing		07/02/2015-12:24		
Project Reach Ministries	Certificate/Certificate of Publication	Filing		07/01/2015-12:26		
Project Reach Ministries	Judgment/Foreclosure	Judgment		06/09/2015-13:15		
Ratner, Allan J.	Judgment/Foreclosure	Judgment		06/09/2015-13:15		
Ratner, Allan J.	Notice/Foreclosure Sale	Filing		06/09/2015-13:15		
Ratner, Allan J.	Judgment/Foreclosure and Sale	Judgment		06/09/2015-13:14		
Ratner, Allan J.	Affidavit/Attorney Fees	Filing		06/09/2015-13:14		
Ratner, Allan J.	Notice/Notice of Hearing	Filing		05/06/2015-16:36	06/09/2015-16:36	
Ratner, Allan J.	Reply/Reply to Answer and Counterclaim	Filing		05/06/2015-13:51	06/09/2015-13:51	
Project Reach Ministries	Answer/Answer	Filing		04/06/2015-10:39	06/09/2015-10:39	
Ratner, Allan J.	Order/Order Filing Fee	Filing		03/26/2015-15:12	06/09/2015-15:12	
Ratner, Allan J.	Order/Order Referred to Special Referee	Order		03/26/2015-15:12	06/09/2015-15:12	
Ratner, Allan J.	Affidavit/Default	Filing		03/26/2015-15:03	06/09/2015-15:03	

Project Reach Ministries	Service/Affidavit Of Service	Filing		02/19/2015-16:38	06/09/2015-16:38
Project Reach Ministries	Service/Affidavit Of Service	Filing		11/07/2014-12:58	06/09/2015-12:58
Project Reach Ministries	Service/Affidavit Of Service	Filing		10/20/2014-14:51	06/09/2015-14:51
Ratner, Allan J.	Property Description	Filing		10/01/2014-16:25	06/09/2015-16:25
Ratner, Allan J.	Summons & Complaint	Filing		10/01/2014-16:23	06/09/2015-16:23

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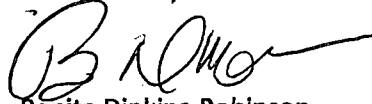
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CERTIFICATE OF SERVICE

I, Benita Robinson, hereby serve this Motion to Reconsider and request for Oral Arguments on the defendant's Attorney Bryan Doby on April 10, 2023, via regular mail 1 Court House Square Bishopville, SC 29010.

Respectfully Submitted



Benita Dinkins-Robinson

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