

Amber Knight aka Amber Walls  
376 O'Shields Rd Easley S.C.  
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S.C. Court of Appeals  
1120 Senate St.  
Columbia S.C.29210

## Motion for Stay

You are notified that on  
April 65,2023, or as soon thereafter as counsel can be heard, in Courtroom of the  
Court of Appeals  
April 26,2023  
South Carolina, at the Court of Appeals 1220 Senate St. Columbia, Richland county S.C.  
29640

Defendant attorney, will bring on for hearing her Motion for Stay Pending Appeal for the  
reasons stated in the above Motion

376 O' Shields Rd  
Easley S.C. 29640

Amber Knight aka Amber Walls  
Pro -Se  
864-341-6111

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MAY 08 2023

SC Court of Appeals

Amber Knight AKA Amber Walls  
376 O'Shields Rd. Easley S.C.  
29640  
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Court of Appeals  
1220 Senant ST. Columbia S.C.  
29629201  
803-734-1890

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25th of April 2023

Dear Justice,

I am filing for a motion to stay in the foreclosure case NO 2019-CP-39-00506. To have to leave my home would cause irreparable injuries. I have close to 75k in equity in my home. I also suffer from P.T.S.D. and severe anxiety as a result from finding my fiance after he took his own life just a few short months before this foreclosure case started.

I make what little money I can to live while dealing with my disorders by breeding and training dogs. So my home is also my business and home to 5 German Shepherds and two barn cats.

In the event of a move I would have to relocate 5 dogs, fencing, kennels, 2 buildings and all my equipment that is not including all my personal belongings and the content of my home. And honestly I don't have anywhere to go or any money to go with, my entire life savings is tied up in my home.

Upon Appeal I intend to prove Wrongful Foreclosure, violation of professional code of conduct by Special Referee Tyler B. O'Shields in rule 1,2,6,9,12,13 from an attorneys stand point and several as well from the Judges code of conduct which will be outlined and attached to the notice of appeal. Also Daniel Hunt for violation of the professional code of conduct 6,7,5,1,2,4,9,13 along with perjury, misconduct, proving without a doubt not only did I not receive a fair judgment, I didn't receive a fair trial or fair process of procedure set forth in the S.C. Home Affordable Program(HAP) issued by the Supreme Court, Order 2011-05-02-01.

Special Refere O'Shieldse signed his ruling on February 1, 2023 their was then a copy of the judgment given to the Plaintiffs attorney to file, Mr, O'Shields and Mr. Hunt filed the orders with the clerk of court on February 22, 2023 giving a far more advantage and notice to the Plaintiff over the Defendant, 38 days to be exact

I did not receive the final ruling and notice of sale date until April 3, 2023 28 days before the sale of my home is set to take place, giving me 28 days to file for appeal. Representing myself, not an easy task. A lot of due diligence goes into preparing court papers when you're not familiar with what you're doing. I'm assuming the whole point of my late notification, Mr, O'Shields being placed with such a responsibility and trusted with the power to rule should know what the code of conduct states about this very matter, Mr. O'Shields should know this is not an ethical way for a judge to handle matters.



Attached are the copies of Mr. O'Shields final Order along with the Plaintiffs judgement and a notice of service to the defendant all mailed and received in the same envelope, and the time stamps on the orders along with the date on the notice of service will clearly back up my claims.

Mr.O'Shields Special referee also disregarded all evidence presented to him by the Defendant proving that the plaintiffs and his attorney had perjured statements on the very 1st complaint filed on April 26,2022 He also disregarded the fact that the plaintiff lied while under oath during the hearing in his office on 11/29/2022, He also disregarded the fact that the Plaintiff and his attorney tried to mislead the court with testimony about the fact that the Defendant had in fact complied with the one and only notice sent and had a check mailed and received by the Plaintiff for the full amount requested of 1,696.28 to include interest and late fees on the Plaintiffs desk 23 days from the date of the 1st and only notice received from the Plaintiffs or his attorney . Yet on the complaint filed on 04/26/2022 on page 4 paragraph 17 it states, The Plaintiff has made several attempts to collect from Deendant debt due under the Note and Mortgage, but Defendant has failed and refused to pay the remaining balance to Plaintiff. That is absolutely untrue and clearly proven to be a lie with dated documents.

Mr,O'Shields doesn't mention any of that in his final ruling nor the fact that I had an agreement with the Loopers, the original mortgagors, to catch the note up in March 2022. He only mentions that the Defendant admitted she was behind on the payments and that she didn't pay the taxes, no mention that Mr.Norton lied while under oath and testified he paid the taxes in 2022, or that I Had been approved for the SC HRP and they had paid the taxes along with willing to pay all the payments I was behind on currently after Mr. Norton returned my payment back in March of 2022, for the full amount requested in his notice from Mr. Hunt that he had purchased the note from the Loopers.No mention of the evidence presented that shows the Defendant and the attorney from Greenville law service made several attempts to contact Danile Hunt for 5 months with no avail about reinstating the loan and their were emails time stamped to confirm that..

I thought with all this evidence of perjury, Misleading facts, compliance with the 1st and only notice sent from Mr, Hunt and the Plaintiff dated 02/07/2022 would have some kind of influence in his decision. I had more than proven malicious and unfair acts by the Plaintiff and his attorney. I had proven several violations of the rules of professional conduct on behalf of Mr. Hunt and I had established a pattern throughout the whole process leading up to the day of the hearing, continued misconduct with such confidence of not being held accountable for their actions. I can't help but wonder where the sense of entitlement comes from.

In their summons for the hearing set on 11/29/22, they request to the court. That Mr. O'Shields to be placed over the hearing,Mr' Hunt even states they pray the court will appoint Mr. O'Shields to the case.

I know the appeals court and the Supreme court does not try the cases, only decides if there was a fair hearing and judgment. Well I pray when the evidence is presented to the higher court that someone feels obligated to somehow have these men held accountable for their actions and lack thereof. I'd bet my house it wouldn't take much of an investigation to find many many similar cases where homeowners have unfairly and unjustly lost their homes where these three gentlemen are concerned.

Upon returning home from the special referee hearing, I continued my due diligence and in doing so I found the amendment from the supreme court order for the Home Affordable Modification program (HMP) issued on 2009-05-22. The amendment issued 2011-05-02 stated all lenders must go by the HMP and in doing so must present the mortgagee with a copy of the order informing them of their rights for mortgage intervention and all acting as a servicer on a occupied home mortgage must comply and participate in the program. This was not done, the Plaintiff and Special referee

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At which time I was advised by an attorney to file a motion to dismiss. I'm thinking between the evidence presented with my compliance to the 1st and only notice and now a court order stating the that in fact the same order from the supreme court Mr. Hunt used in his very 1st summons and complaint that had perjured statements in it, on page 4 paragraph 19 it states his client has been informed and believe he is not subject to the HMP issued 2009-05-02-01 has in fact had a amendment added to it 2011-05-02-01 that states he does have to comply. I'm thinking this nightmare is finally over, not only do i show plenty of cause to have the case dismissed but Ive tacked on another violation to Mr, Hunts violation of code of conduct because this clearly shows he either really didn't know about the amendment issued 10 years ago showing he is not staying current in continuing education or he purposely ignored the order for personal gain, Either way more proof of misconduct. 75k seems like a lot of reasons for a lot of misconduct. I knew the only way Mr. O'Shields could possibly rule in the Plaintiff's favor was if he was not going to uphold the law as he had sworn to do. I filed my motion stating all the things I Had proven with documents, pointed out the 2011 amendment and the fact that neither of the 2 attorneys were familiar with it, yet practicing real estate law. And that Mr, O'Shields had a responsibility to the judicial system to report Mr, Hunt to the proper authorities as it so states in the rules of professional conduct,

Not only did my motion go acknowledged and unanswered nor anything mention of the very valid points I made and proved, The only mention of my motion to dismiss is on page 2 paragraph 17 of Mr. O'Shields ruled that such a motion is untimely filed. In all my research I can not find anything anywhere that states untimely time to file a motion to dismiss other than after a judge has made his ruling due to the fact new information can arise in a case at any point in time throughout the duration of a case that calls for a dismissal.

I feel that since I complied with the 1st and only notice sent by the Plaintiffs attorney that should have been it. If his attorney made a mistake on the notice a simple phone call for he difference would have sufficed, once we figured out what was going on with the payment with out any information it turned out they made quite a few mistakes, but the fact of the matter is the check was only about 58.00 short, but regardless the check was written for the exact amount they asked for. So the bottom line is I am supposed to pay with my home and my life's savings for a \$58.00 mistake that Daniael Hunt allegedly made.

There are many many more mistakes, misshapes, misconduct that I am ready to prove to the court upon approval of an appeal. Like the fact that not only did they not accept my payment when I complied with their request, along with turning down South Carolina Home Mortgage relief for the full payment after they drug me along for a year. They failed to go by the S.C. guidelines andl procedures placed in effect by the supreme court order 2011-05-02-01 in fact they state in their complaint filed 04/26/2022 by the Plaintiffs attorney, that the Plaintiff had been informed he wasn't applicable to follow the 2009-05-05-01 issued by the supreme court. I was even told by the attorney at Greenville law services that did not apply to any loan I had from a private lender. It wasn't until the day of the hearing I came home and started googling again one last ditch effort when I found the amended order. Got on the chat line with an attorney and explained to him in detail what had taken place he advised to file a motion to dismiss. At which time it was bright to Hunt and O'shields attention and they still chose to ignore it. I have attached documents to support every allegation in this letter. And I have documents to support every allegation that I have from perjury to misconduct

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They have yet to acknowledge the fact that the supreme court order amended to the 2009-05-02-01 on 2011-05-02 they state the original order in the very first complaint that should have had a cop of the 2011-05-02 order informing me of my rights to Mortgage intervention, I should have qualified for the HMP seeing how I occupied the home and had the money to catch the payment up.

Mr.O'Shields even goes as far as stating he followed the guidelines of the order 2020-05-06-01 that was dismissed 2 years prior to my case even taking place,than the do about their proffesion, Every thing they claim I cam pove to be misleading, or not true. Here today I put my faith in the High court with the Justices and I pray to God they see and bring justice to this case.

**Sincerely, Amber Knight AKA Amber Walls**

Certificate of Service

This is to certify that

Amber Knight Pro-Se attorney for Defendant have this date served a true and correct copy of the above and foregoing Motion for Stay Pending Appeal and Notice of Motion by USPS mail to the following counsel of record for Plaintiff Daniel Hunt  
Post Office Box City, 887 Easley SC 29640

This the

day of  
May  
1, 2023

Amber Knight  
376 O' Shields Rd. Easley S.C.  
29640

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MAY 08 2023

SC Court of Appeals

Certificate of Service

This is to certify that

Amber Knight Pro-Se attorney for Defendant have this date served a true and correct copy of the above and foregoing Motion for Stay Pending Appeal and Notice of Motion by hand delivery, from Bruce Land, to the following counsel of record for Plaintiff Daniel Hunt

Post Office Box City, 887 Easley SC 29640

This the

day of

review April 29, 2023

Amber Knight  
376 O' Shields Rd. Easley C

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SC Court of Appeals

**FORM 9  
LETTER TO CLERK OF LOWER COURT  
FILING NOTICE OF APPEAL**

April 25 th 2023

Special Referee Tyler B.O'Shields  
Special Referee Pickens County  
117 West Main Street  
Easley, South Carolina 29640

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MAY 08 2023

SC Court of Appeals

RE: KCM & AHS, LLC , Respondent, v. Amber M. Walls, Appellant, Case  
No. 2022-CP-39-00506

Dear: Tyler B. O'Shields

Enclosed for filing is a notice of appeal in the above case.

Sincerely,

Amber M. Walls  
376 O'Shields Rd.  
Easley, South Carolina  
(864)341-6111  
for Appellant

Pro-See

cc: Daniel E. Hunt  
Post Office Box 887  
Easley, South Carolina  
29641(864)859-7127  
Attorney for Respondent

**Amber Walls / Knight**

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SC Court of Appeals

**P**

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EASLEY SC 29640

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EXPECTED DELIVERY DAY: 05/05/23

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ATT: TYLER, S.C. COURT OF APPEAL  
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