

July 5, 2013

TO: Supreme Court Clerk/attn: Debie

Ref: Appellate Case no. 2012-213516

Lower Court Case no. 2011-CP-40-08913

**Please be review the attached signatures and CORRECTED DATES,
the Original documents will be hand-delivered to your office on Monday.**

Thank you.

Faxed for Appellant/Terra Freeman

RECEIVED

JUL 05 2013

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court Case No. 2012-213516

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas Case No. 2011-CP-40-08913

Joseph M. Strickland (Master of Equity) Judge
(allegedly) Special Circuit Court Judge

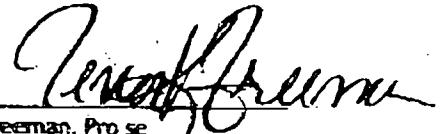
Dear Clerk:

Please find the proper corrections of the attached erred dates, regarding Appellant/Plaintiff's
Motion for Reinstatement.

July 5, 2013

Sincerely,

cc: Jody A. Beckenbaugh c/o Erik T. Noten
cc: Ruth Kennedy


Terra K. Freeman, Pro se
112 Vineyards Crossing Ct, Columbia, SC 29226

THE STATE OF SOUTH CAROLINA
In the Supreme Court Case no. 2012-213516

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas – Case no. 2011-CP-40-08913

Joseph M. Strickland (Master of Equity) Judge
(allegedly!) Special Circuit Court Judge

Terra K. Freeman, et al **Appellants,**

v.

Bank of America **Respondent.**

CORRECTION OF DATE should read JULY 3, 2013 – FILED RECORDS ON APPEAL

Mrs. Ruth Kennedy, Pro Se Mrs. Terra K. Freeman, Pro Se
263 Blythe Creeke Drive 112 Vineyards Crossing Court
Blythewood, SC 29016 Columbia, SC 29229
Above Appellants...

Jody A. Bedenbaugh-c/o Erik T. Norton
SC Bar Numbers. 71176 & 73860
1320 Main Street/17th Floor
P.O. Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000
Added Attorneys for Bank of America

Correction DATE: July 3rd, 2013

~~CORRECTED ON: July 5, 2013~~

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT OF APPEALS
Appellate Case no: 2012-213516

Page 1 of 3
Attachment-5

APPEAL FROM the RICHLAND COUNTY
Court of Common Pleas
Joseph M. Strickland (alleged Substitute) Judge
Lower Case no. 2011-CP-40-08913

Terra K. Freeman and Ruth Kennedy, Pro Ses ¹

Plaintiff/Appellants

vs.

Bank of America, c/o Missy Graham, Office of Assistant
Manager and Jane Barford, Personal Banker,

Defendant(s)/Respondent(s)

MEMORANDUM with CITATION of AUTHORITIES
in SUPPORT of MOTION TO REINSTATE

Pursuant with SCACR 204(a)(c)(d), 207, and 267(b) these above said pro se are individually/but jointly writing this said Memorandum with Citation of Authorities, regarding this Supreme Court's attached Order which appears to have against, filed in error, its Dismissal of Appellants' Petition for Appeals, now pursuant with "Belue v. Belue, 267 S.C. 120, 276 S.E.2d 295 (1981)", and Rule 221, SCACR, although ! this Supreme Court did not consider that both Appellants filed their Appeal involved a "...FINAL JUDGMENT INVOLVING a Challenge on STATE or Federal Grounds to the Constitutionality of a STATE LAW..." pursuant with SCACR 203(a)(1)(A)(B)²

SUPREME COURT'S OBVIOUS ERRORS in its Order June 19, 2013 do to the following:

1. Supreme court's 6/19/2013 Order admits these Appellants "appeals involves TWO ORDERS issued by the Circuit Court...which granted a motion to dismiss...dated APRIL 12, 2012." Regarding "...The TRANSCRIPT of the MARCH 30, 2012, HEARING on this Motion INDICATES that NEITHER APPELLANT was PRESENT at THAT HEARING."; But yet this Supreme Court's court signed Letter dated "February 27, 2013" contradicts that "...the HEARINGS SCHEDULED for MARCH 2012, the Court Reporter indicates that, while the Respondent Appeared through counsel, neither of you appeared. As a RESULT, NOTHING was apparently PUT ON the RECORD for THAT HEARING. Therefore, NOT TRANSCRIPT is AVAILABLE for said (MARCH 2012) date.". Which is Untrue.

¹ *HAINES v. KERNER ET AL*, No. 70-5025, SUPREME COURT OF THE UNITED STATES - says Cases on Pro Se Rights that "...Allegations such as those asserted by Petitioner, however heartfully pleaded are sufficient..." Which states we do not hold "...Pro Se claims to the same Standards as an Attorney. "...Prisoner's pro se complaint... should not have been dismissed without affording him the opportunity to present evidence on his claims." 4:27 F.2d 71, reversed and remanded."

² 203(a)(1)(A)(B) states "...Any final judgment involving a challenge on state or federal grounds to the constitutionality of a state law or county or municipal ordinance where the principal issue is one of the constitutionality of the law or ordinance;"

1a): This said Supreme Court's ORDER of 6/19/2013, shows further! It ERRED/or Otherwise! intentionally OVERLOOKED, the fact! that this Supreme Court ADMITTED/or acknowledge! that it READ! the said lower trial court Judge Strickland's ORDER dated "APRIL 12, 2012" "...which granted a motion to dismiss", although! this said Supreme Court NEVER ACKNOWLEDGED!! that the said lower trial court's actual! read ORDER! of "APRIL 12, 2012" always INDICATED also!! that the said Appellant/Plaintiff(s) DID!! APPEAR! at the alleged MARCH 30, 2012 lower Court Hearing;

1b): Appellant/Plaintiffs already PRODUCED Documented Evidence to this said Supreme Court (that's been OVERLOOKED/or in Error was not consider in this Supreme Court's ORDER dated 6-19-2013) which the said documented evidence showed to this said Supreme Court that the said Lower Trial Court's DOCKET/and/or Case HISTORY SHEET- NEVER showed the lower trial court Judge Strickland never! placed Appellant/Plaintiffs filed State Court COMPLAINT to be actually heard within ANY! OPEN COURT HEARINGS, on the date MARCH 30, 2012, nor on the date NOVEMBER 1, 2012³...

"(due to lower Court Judge Strickland's always known and ADMITTED to his personal biased interest and/or personal known INVOLVEMENTS with the Defendant/BANK of AMERICA's admitted involvements with Appellant/Plaintiffs named PAYEE/COG/and or COG's Agents Pough, McQueen and Brandon; as well as the said lower trial court Judge Strickland's ADMITTED to been a former! HIRED EMPLOYEE with Defendant/ BOA's hired said Attorney(s) Nelson & Muller's LAW FIRM - who ALSO! was known to ALWAYS been involved with Appellant/Plaintiffs' Cashiers Checks/or Money Orders named PAYEE/COG, regarding claims filed and FIRST!! RULED! in FINAL! JUDGMENT(s) filed ONLY!! within a STATE! COURT!! Civil and Criminal proceedings that took place since the year 2007, SETTLED/RESOLVED/and DISMISSED, as well as GRANTED FULL RELIEF from SCAG/South Carolina ATTORNEY GENERAL Office Officials/Plaintiff(s) prior rendered STATE! COURT! ORDERS - Ruled ONLY in FAVOR!! of Appellant/Plaintiffs named PAYEE/COG and COG's said PRO SE parties were heard/and or/RECEIVED FINAL! State Court Orders ONLY within the said RICHLAND COUNTY STATE Court, in the YEAR 2007, which involved this said Appellant/Plaintiffs' PRO SE monies.)"

SUPREME COURTS 6-19-2013 ORDER is Unreliable/or BOOT or ERRED - WHEN it TRUSTED/or Accepted ONLY! Lower Court's written ORDER-NOV. 2, 2012 YET! SUPREME COURT Only!! RELIED UPON Lower Court's "TRANSCRIPT!!" HEARING! DATED "MARCH 30, 2012"; But DID! NOT! RELIE upon Lower Court signed ORDERED CLAIMS dated "APRIL 12, 2012"-acknowledging APPELLANT/Plaintiffs allegedly APPEARED in THAT said LOWER COURT HEARING allegedly on "MARCH 30, 2012"

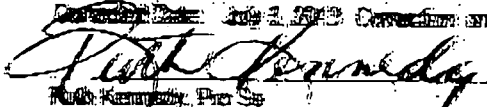
2. This Supreme Court's ORDER dated 6-19-2013 second paragraph, ADMITS it relies upon ONLY!! the said Lower Trial Court Judges Strickland's written ORDER! dated "NOVEMBER 2, 2012", but! this same Supreme Court signed Judge's LETTER dated "February 27, 2013" on second page, and second paragraph ADMITS!

"...that the ONLY!! TRANSCRIPT! that is AVAILABLE in this matter is the HEARING of NOVEMBER 1, 2012, and THAT! TRANSCRIPT!! has been mailed to you. Therefore, the NATURAL REMEDY... will need to be served and filed within THIRTY DAYS of the DATE of this LETTER OR within THIRTY DAYS of your RECEIPT! of the TRANSCRIPT!! of the NOVEMBER 1, 2012 HEARING, whichever is LATER." Which CONTRADICTS!!/or shows ERROR of Supreme Court Order 6-19-2013.

³ due to Appellant/Plaintiffs ALWAYS provided to this said Supreme Court showing documents of their FILED SUIT!! for DISQUALIFICATION of the said lower trial court Judge Strickland, who NEVER!! RULED!! nor present SIGNED No! ORDER!! regarding his DISQUALIFICATION on the dates MARCH 30, 2012 nor NOVEMBER 1, 2012, when this said Supreme Court's ORDER alleged on 6-19-2013 - ADMITS!! that Both Appellant/Plaintiffs filed their "...APPEALS INVOLVED! FROM OR DEPEND! ESSENT!! by the CIRCUIT COURT..." (including the said lower trial court ORDERS dated "APRIL 12, 2012" and "NOVEMBER 2, 2012".

2. **WHEREAS** this Supreme Court's ORDER dated 6-19-2013 claiming "... The First ORDER granted a motion to dismiss dated APRIL 12, 2012. The TRANSCRIPT of the MARCH 30, 2012, HEARING INDICATES... an alleged HEARING was heard without the Present of said Appellant/Plaintiff although this said Supreme Court's ADMITTED READING also of the Lower Trial Court's actual WRITTEN ORDER dated APRIL 12, 2012 signed with the actual NAME of the JUDGE JOSEPH M. STROCKLAND INDICATES the Appellant/Plaintiff indeed DID APPEAR at the said MARCH 30, 2012 Hearing, which also COMPLETES the STATE Supreme Court's court written LETTER dated February 27, 2013" which ERRORED and claimed "... As to the HEARING SCHEDULED for MARCH 2012, the RECORDED for THAT HEARING NO. TRANSCRIPT IS AVAILABLE for that DATE..." yet this said Supreme Court ORDER dated 6-19-2013 ERRORED for the said lower trial court's REPORTER, and the intentional UNLAWFUL of this Supreme Court which instead has said Court to have said "The TRANSCRIPT of the MARCH 30, 2012..." was indeed "AVAILABLE" and or was Reported. Therefore, shows and supports Appellant/Plaintiff claims made in their written NOTICE OF APPEAL that the said lower trial court's ORDERS, entered and ADMITTED to personal interest and biased due to the Lower trial court's written JUDGMENTS such as a challenge on state or federal grounds to the constitutionality of a state law..." pursuant with SCAR 2034(A)(1)(A)(2)

WHEREFORE, pro se Appellant/Plaintiff states that this said memorandum is proper and correct as to their beliefs and attempt to comply to the rules of this said Supreme court, but also state that if there are any additional requirements in which need amended, please do not hesitate to contact State said Appellant/Plaintiff.

Dated this 1st day of July 2013. Executed on July 5, 2013

 Ruth Kennedy, Pro Se
 253 Birch Creek Dr., Spartanburg, SC 29306

Respectfully Submitted,

 Terra Freeman, Pro Se
 Vineyards Crossing Ct, Columbia, SC 29229

This said Supreme Court's ORDER of 6-19-2013, REFUSED for the said relief itself upon the said lower trial court's written ORDERED CLAIMS dated APRIL 12, 2012 - WHICH alleged that Appellant/Plaintiff indeed DID APPEAR at the alleged "MARCH 30, 2012" HEARING, which this said Supreme Court's 6-19-2013 ORDER, and this said Supreme Court's court written LETTER dated February 27, 2013" showed the said lower trial court's REPORTER was UNLAWFUL in this said Supreme Court regarding the TRANSCRIPT of MARCH 30, HEARING was indeed RECORDED, as well as this said Supreme Court on 2-27-2013 ADMITS that Appellant/Plaintiff DID ALWAYS REPORTED and had personal CONTACTS with the said lower trial court REPORTER, and also ADMITTED by this said Supreme Court "THESE CONTACTS OF COURT REPORTER, Mr. Robin [redacted] about what the TRANSCRIPTS ARE AVAILABLE IN THIS MATTER." Therefore, shows these PRO SE Appellant/Plaintiff ALWAYS DID comply with this Supreme Court RULES 207, as to WHY this said Supreme Court ALSO ORDERED and DENIED APPEAL Appellant/Plaintiff prior also ERRORED Dismissal. (See attached Supreme Court's attached Order dated February 1, 2013)

WHEREAS, this said Supreme Court's ORDER dated January 2, 2013, also APPEAL was ERRORED BY THE COURT WITH CORRESPONDENCE showing the TRANSCRIPT of the said lower trial court REPORTER as Reported by Rule 207, SCAR 6, SPYLANDS HAVE FILED A REPLY, which is COMPLIANCE with Rule 207, USE ERRORED RESTATEMENT the APPEAL

THE STATE OF SOUTH CAROLINA
In the Supreme Court Case No. 2012-213516

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas Case No. 2011-CP-40-08913

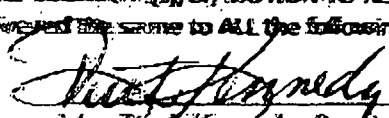
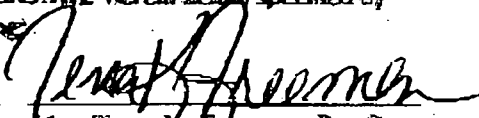
Joseph M. Strickland (Master of Equity) Judge
(Judge of the) Special Circuit Court Judge

Terra K. Froehner, et al. Appellants.

Bank of America Respondent.

PROOF of SERVICE

I, the undersigned, Pro Se Appellant/Plaintiff, do hereby certify that I have served all counsel in this action with a copy of the document(s) or MOTION TO REINSTATE herein below specified by mailing, faxing or hand-delivering the same to ALL the following:

| | |
|--|--|
|  |  |
| Mrs. Ruth Kennedy, Pro Se 263 Blayde Creeke Drive Blythe wood, SC 29016 Above Appellants... | Mrs. Terra K. Froehner, Pro Se 112 Vineyards Crossing Court Columbia, SC 29229 |

Jody A. Bedenbaugh c/o Erik T. Norton
SC Bar Numbers: 71176 & 73860
1320 Main Street/17th Floor
P.O. Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000
Added Attorneys for Bank of America

Document(s) attached served:

- Supreme Court's ORDER dated June 19, 2013
- Supreme Court's LETTER dated February 27, 2013
- Supreme Court's ORDER dated February 6, 2013

Total Attachments: -3-

Corrected Date: July 3rd, 2013
Correction Dated: July 5, 2013