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**Jan 16 2024**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM DARLINGTON COUNTY  
Court of Common Pleas

Case No. 23-CP-160070  
Case No. 23-CP-160071  
Case No. 23-CP-160072  
Case No. 23-CP-160073  
Circuit Court Judge

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Magistrate Civil Cases  
Case No. 2022CV1610401203  
Case No. 2022CV1610401204  
Case No. 2022CV1610401205  
Case No. 2022CV1610401206  
Judge of the Magistrate’s Court – Hon. Craig L. LaCross

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Appellate Case No. 2023-000546

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Stephanie McAnuff, *pro se* ..... Appellant

v.

ASIP Town Park, LLC. .... Respondent

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**REPLY TO RESPONDENT’S RETURN ON APPELLANT’S MOTION TO REINSTATE  
APPEAL**

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I, Stephanie McAnuff, the Appellant in the above-captioned matter, hereby submit this Reply to the Respondent's Return on my Motion to Reinstate the Appeal, and in support thereof, respectfully state the following:

1. **Clarification on Motion to Reinstate:** The Respondent asserts that they have not received a motion to reinstate from the Appellant. However, it is crucial to note that the “Response to Motion to Dismiss” filed by me on November 20, 2023, though not labeled as a Motion to Reinstate, substantially addresses the grounds and intentions of such a motion. This filing was in direct response to the procedural and substantive issues raised in the Respondent's Motion to Dismiss.
2. **On the Matter of Mootness:** The Respondent’s argument for mootness based on the transfer of title of the mobile homes is an oversimplification of the case's complexity. As clearly stated in my earlier filings, the ownership and occupancy of the mobile homes are central to the dispute, but the underlying issue is the Respondent's retaliatory actions and the breach of our profit-sharing agreement. The existence of the mobile homes on the property is a physical manifestation of a broader contractual and business relationship that has been unjustly disregarded.
3. **\*\*Regarding Rule 240, SCACR Compliance:\*\*** It is acknowledged that the filing of a Motion to Reinstate pursuant to Rule 240 was not done within the fifteen-day timeline post the November 14, 2023, Order. However, this oversight should be viewed in the context of the broader procedural irregularities that have marked this case, particularly the Magistrate Court's failure to set a bond amount for my appeals. This failure has significantly impacted my ability to navigate the appeals process effectively.

4. **Good Cause for Reinstatement:** Despite the technical lapse in adhering to the timeline, there is substantial good cause for reinstating the appeal. The issues at hand extend beyond mere property transactions; they touch upon principles of fairness, contractual obligations, and the right to a fair hearing. The Respondent's actions have had significant adverse effects on my livelihood and contractual rights. These circumstances, coupled with the procedural anomalies in the lower court, warrant a thorough review by this Court.
5. **On the Precedential Value of *Jordan v. Hartford Fin. Grp., Inc.*:** While the Respondent cites the importance of adhering to rules and deadlines, citing *Jordan v. Hartford Fin. Grp., Inc.*, it is imperative to balance procedural strictness with substantive justice. The unique complexities and the alleged prejudicial conduct in the lower court proceedings in this case necessitate a more nuanced approach.
6. **Respondent's Alleged Lack of Prejudice:** It is important to note that the Respondent has not demonstrated any substantial prejudice or harm due to the delay in filing the Motion to Reinstatement. The essence of the dispute remains unresolved and requires this Court's intervention for a just resolution.

## **CONCLUSION**

In light of the foregoing, I respectfully urge this Honorable Court to consider the broader implications of this case, particularly its potential impact on my professional standing and earning potential as a licensed Real Estate Broker in the State of South Carolina. The dispute with the Respondent, and the subsequent legal proceedings, have not only affected my personal interests but also posed a significant risk to my professional reputation and ability to conduct business.

The allegations and the procedural irregularities in this case have cast a shadow over my professional integrity, which is paramount in the real estate industry. In my profession as a real estate broker, trust, reputation, and maintaining an unblemished record of ethical conduct are fundamental to my livelihood. The prolonged nature of this dispute and the publicity surrounding it threaten to irreparably damage these critical aspects of my professional life.

Furthermore, the financial strain imposed by the Respondent's actions, coupled with the ongoing legal costs, has put a significant strain on my financial resources. This strain directly impacts my ability to invest in and grow my real estate business, thereby hindering my earning potential in a highly competitive market.

Therefore, I request this Court to consider the far-reaching consequences of this dispute on my professional life and livelihood. Granting the Motion to Reinstate the appeal would not only address the procedural challenges I have faced but also provide an opportunity for a fair resolution, which is crucial for preserving my professional reputation and future earning potential in the real estate industry.

Respectfully submitted,

/s/ Stephanie McAnuff \_\_\_\_\_

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APPELLANT, *PRO SE*

Mint Hill, North Carolina  
January 12, 2024

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**Jan 16 2024**

**SC Court of Appeals**

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January 12, 2024

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**Re: Stephanie McAnuff v. ASIP Town Park, LLC, Case No. 2023-000546**

Dear Mr. Love,

I am writing to inform you that I have completed my "Reply to Respondent's Return on Appellant's Motion to Reinstate Appeal" in the above-referenced case. This document outlines my arguments and positions in response to the points raised in your recent submission.

I believe that this reply comprehensively addresses the issues at hand and clarifies my stance on the matter. My intent is to ensure that all relevant facts and legal arguments are thoroughly considered by the court to facilitate a just resolution of this case.

A copy of this reply will be filed with the court and a copy has been enclosed for your records and any necessary action. I appreciate your attention to this matter and look forward to your response.

Sincerely,

Stephanie McAnuff  
Appellant, Pro Se

**Enclosure:** Reply to Respondent's Return on Appellant's Motion to Reinstate Appeal