

**RECEIVED**

**Jan 30 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

---

Appellate Case No. 2023-001700

---

Ali Adebisi,

Appellant,

v.

Lakeview Loan Servicing, LLC,

Respondent,

---

RESPONDENT'S RETURN TO APPELLANT'S MOTION FOR LEAVE TO FILE A SCRCP  
RULE 60(B) MOTION

---

Chad W. Burgess, Esq.  
(S.C. Bar No.: 72520)  
BROCK & SCOTT, PLLC  
3800 Fernandina Road, Suite 110  
Columbia, South Carolina 29210  
(803) 454-3540  
*Attorney for Respondent*

**NOW COMES** Respondent Lakeview Loan Servicing, LLC (“Lakeview”), by and through its undersigned attorney, and pursuant to Rule 240(e) of the South Carolina Appellate Court Rules, hereby submits its Return to the motion for leave to file a SCRCR Rule 60(b) motion filed by Appellant on January 16, 2024, averring as follows:

**BRIEF PROCEDURAL HISTORY**

On or about March 29, 2019, Appellant obtained a \$79,000.00 home mortgage loan secured by real property commonly known as 1308 Harmony Street, Florence, SC 29501 (the “Property”). The transaction is memorialized by a recorded Mortgage which was recorded in the Florence County Registry on April 3, 2019, in Book 790 at Page 1111. The Note and Mortgage were transferred to Respondent.

Subsequently, the Appellant defaulted under the terms and conditions of the mortgage Note and, on November 14, 2021, Respondent filed a Complaint bearing South Carolina Civil Action Number 2021-CP-21-02234 seeking foreclosure of the Mortgage (“Foreclosure Action”). Appellant appeared in the Foreclosure Action through several sovereign citizen filings.

The Foreclosure Action was referred to The Honorable Haigh Porter, as Master in Equity for Florence County on March 22, 2022. Notwithstanding Appellant’s contest, Judge Porter ruled in favor of Respondent and entered an Order and Judgment of Foreclosure and Sale on May 24, 2022. The property was sold at foreclosure sale on April 4, 2023, with Respondent being the successful purchaser. The Master in Equity’s Deed was recorded in the Florence County Registry on June 20, 2023, in Book 1053 at Page 1920.

Following the foreclosure sale, Appellant filed the underlying action on May 26, 2023. Appellant's Complaint consists of largely unintelligible legal jargon and was presented as a challenge to the completed Foreclosure Action. Appellant filed a motion to add additional parties on June 22, 2023. The parties sought to be added included the presiding judge in the Foreclosure Action, William Haigh Porter. Respondent filed a motion to dismiss and for sanctions on July 24, 2023. Appellant filed a motion for summary judgment on August 11, 2023. Judge Porter opposed Appellant's motion to add additional parties and joined Respondent's request for sanctions. A hearing was held on the pending motions on September 19, 2023. The Honorable George M. McFaddin, Jr. presided over the motions and took the same under advisement. Judge McFaddin informed the parties of his ruling to grant Respondent's motion to dismiss and to deny Appellant's motions to add additional parties and for summary judgment, and to grant sanctions against Appellant in a written memorandum to all parties dated October 11, 2023. Judge McFaddin's memorandum requested two orders be submitted to formalize his ruling. On October 27, 2023, the first of the orders was entered which addressed the denial of Appellant's motion to add additional parties and addressed a portion of Judge McFadden's ruling to grant sanctions against Appellant. This appeal followed.

### **ARGUMENT AND CITATION OF AUTHORITY**

Appellant's motion for leave to file a SCRCF Rule 60(b) motion is yet another in a long line of sovereign citizen filings similar in nature similar to appellant's underlying complaint and the numerous filings made in this action and the Foreclosure Action. Respondent has previously referenced Appellant's similar frivolous action against the undersigned counsel for Respondent, William Haigh Porter, Doris Poulos O'Hara (Florence County Clerk of Court), and Dawn Pappas

(Deputy Clerk of Court) on September 11, 2023, which was dismissed with prejudice on October 24, 2023. *See* SC Civil Action Number 2023CP2102160. Because Appellant’s sovereign citizen motion lacks all semblance to a cogent and legally cognizable request for relief, it should be summarily denied.

Appellant’s motion appears to assert newly discovered evidence as the grounds for seeking relief from the underlying judgment. In support of his motion, Appellant submitted documentation purporting to be requests pursuant to 22 U.S.C. §611 for Foreign Registration Statements from the undersigned and The Honorable William Haigh Porter, as Master in Equity for Florence County. These requests are nonsensical and in no way relevant to the Foreclosure Action, this action, or any legal matter whatsoever. Further, the purported requests do not constitute valid freedom of information requests under either the Federal Freedom of Information Act (5 U.S.C §552, et. seq.) or the South Carolina Freedom of Information Act (SC Code §30-4-10, et seq.). As such, Appellant’s motion is devoid of any allegation of newly discovered evidence that would merit leave to file a SCRCF Rule 60(b) motion and his motion should be summarily denied.

### **CONCLUSION**

For the foregoing reasons, Lakeview Loan Servicing, LLC, respectfully requests that this court summarily deny Appellant’s motion for leave to file a SCRCF Rule 60(b) motion, and requests such other relief this Court deems just and proper.

**[SIGNATURE PAGE TO FOLLOW]**

Respectfully submitted,

BROCK AND SCOTT, PLLC



Chad W. Burgess, S.C. Bar No.: 72520  
3800 Fernandina Road, Suite 110  
Columbia, South Carolina 29210  
(803) 454-3540

*Attorney for Respondent Lakeview Loan  
Servicing, LLC*

Dated: January 30, 2024

**RECEIVED**

**Jan 30 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

Appellate Case No. 2023-001700

Ali Adebisi,

Defendants,

v.

Lakeview Loan Servicing, LLC,

Respondent,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on JANUARY 30, 2024, she served a copy of Respondent's Return to Appellant's Motion for Leave to file a SCRCR Rule 60(b) Motion, and Certificate of Service by Mail upon the person below by depositing the same in the U.S. Mail with proper postage affixed and addressed as follows:

Ali Adebisi  
1308 Harmony Street  
Florence, SC 29501

Ali Adebisi  
1901 W. Evans Street, Unit 5372  
Florence, SC 29502

  
Lauren Browder  
BROCK & SCOTT, PLLC