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**Feb 29 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
COURT OF APPEAL

Ali Adebisi  
Appellant

case no. 001700

Vs

LAKEVIEW LOAN SERVICING, LLC  
Respondent(s)

Motion to Strike Late Filing/  
Return and Impose Sanctions  
Criminal Complaint Attached

NOW COMES I, Ali, Adebisi, (hereinafter the appellant) in the above-captioned case, hereby file this Motion to Strike the late filing/return submitted by the Respondent, on February 6, 2024. Additionally, I request the imposition of appropriate sanctions against the Respondent for their noncompliance with court rules and orders.

Pursuant to Rule 6 of the South Carolina Appellate Court Rules, parties are obligated to adhere to prescribed time limits for filing motions, briefs, and other documents. While Rule 6 allows for extensions under certain circumstances, it does not condone repeated or unjustified delays in filing. Rule 60 of the South Carolina Appellate Court Rules permits relief from judgment or order for mistakes or excusable neglect. However, it does not provide a blanket justification for habitual late filings.

Rule 221(d) of the South Carolina Appellate Court Rules emphasizes the consequences of failing to meet procedural requirements, including the potential dismissal of the appeal. Although Rule 221(d) specifically addresses notice of appeal, its underlying principle underscores the necessity of timely compliance with court procedures.

On February 6, 2024, the Respondent submitted a motion to return. This filing was made well beyond the prescribed deadline and without any demonstration of excusable neglect or good cause. The Respondents failure to adhere to established deadlines prejudices the appellant's rights and disrupts the orderly administration of justice. Respondent has wasted no time on striking the appellant, and there has been no show of cause why the Respondent was late.

Wherefore, the appellant respectfully requests that this Honorable Court grant the following relief:

- a. Strike the late filing/ motion to return submitted by the Respondent on February 6, 2024.
- b. Impose appropriate sanctions against the Respondent for their noncompliance, including striking the Respondents late filing/ motion to return and granting Appellant summary judgement.
- c. order the Respondent to produce a Foreign Registration Statement, which is mandatory under the Foreign Agent Registration Act of 1938 and Chad Wilson Burgess has failed to answer when compelled which a violation of Rule 24(a) of the appellate court rules.
- c. Commence a criminal investigation and any other relief granted by the court.

Respectfully submitted,

Ali, Adebisi

Adebisi Ali  
Affiant  
1901 W Evans Street  
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Florence, South Carolina

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**PROOF OF SERVICE**

Now comes Ali, Adebisi, Appellant, with a Motion to Strike Late Filing/Return and Impose sanctions. To be placed before the Court of Appeals in the State of South Carolina on this day of 29<sup>th</sup> and month of February, 2024.

cc: Chad.Burgess@brockandscott.com

cc: malloy@mceachinlawfirm.com

Ali, Adebisi