

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

The Honorable Joseph Strickland, Master in Equity

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Appellate Case No. 2023-001826

Case No.: 2023-CP-40-03343

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Freedom Mortgage Corporation, Respondent,

v.

Sherman Smith, Appellant.

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RESPONDENT'S RETURN

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Freedom Mortgage Corporation ("**Respondent**") files this Return to the Appellant's Second Motion to Dismiss ("**Motion**"). Respondent does not object to the appeal being dismissed, however to the extent that the Motion seeks to dismiss the underlying state court action filed in the Richland County Common Pleas C/A No.: 2023-CP-40-03343 ("**Trial Court Action**"), the Respondent objects to this request as the Sherman Smith ("**Appellant**") does not provide a basis for the dismissal of the Trial Court Action.

**RESPECTFULLY SUBMITTED,**

April 29, 2024

/s/ J. Martin Page

J. Martin Page S.C. Bar No.: 100200

BELL CARRINGTON PRICE & GREGG, LLC

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*Attorney for Respondent*

**RECEIVED**

**Apr 29 2024**

**SC Court of Appeals**

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Certificate of Service

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I, the undersigned attorney for Freedom Mortgage Corporation does hereby certify that I have served the below in this action with a copy of the Respondent's Return via regular mail.

Sherman Smith  
200 Grandview Circle,  
Columbia, SC 29229

April 29, 2024

/s/ J. Martin Page

J. Martin Page S.C. Bar No.: 100200  
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