

State of South Carolina
County of Spartanburg

Common Pleas
2023-CP-42-03390

Federal Home Loan Mortgage
Corporation, as trustee for
Freddie Mac Seasoned Credit
Risk Transfer Trust, Series
2017-2, as owner of the
Related Mortgage Loan,
Plaintiff

Certificate
of
service

[Exhibit 1]

RECEIVED

AUG 09 2024

SC Court of Appeals

vs
Charles Morris, defendant
et al

The defendant Cornie Morris III, certify
that he have served the below plaintiffs with
a copy of his motion to Alter/Amend by
placing a copy in the Perryman Room Rm 105
for mailing, addressed as follows, postage
prepaid.

Ion Cohean (GAL)
Attorney Athaw
325 Rocky Slope Rd
Greenville, S.C.
29607

Scott + Corley, P.A.
P.O. Box 2065
Columbia, S.C. 29204

I, Cornie Morris III, certify and verify under
the penalty of perjury that the foregoing is
true and correct.

RECEIVED

MAR 15 2024

PCI MAILROOM

Cornie Morris III

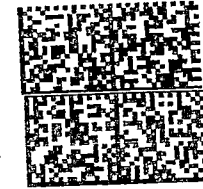
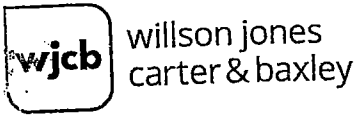
(9)

(6)

(10)

TLB
WILLSON JONES CARTER & BAXLEY, P.A.
ATTORNEYS AT LAW
325 ROCKY SLOPE ROAD, SUITE 201
GREENVILLE, SC 29607

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FIRST-CLASS MAIL
IMI
\$000.88[®]
03/06/2024 ZIP 29607
043M30222401

US POSTAGE

Carnie Norris, III, 00227226, Q4B-0220-B
Perry Correctional Institution
430 Oaklawn Road
Pelzer, SC 29669

RECEIVED
MAR 11 2024
PCI MAILROOM

[Exhibit 2]

STATE OF SOUTH CAROLINA
 COUNTY OF SPARTANBURG
 IN THE COURT OF COMMON PLEAS

FORM 4
 JUDGMENT IN A CIVIL CASE

CASE NO. 2023-CP-42-03390

Federal Home Loan Mortgage Corporation, as trustee
 for Freddie Mac Seasoned Credit Risk Transfer Trust,
 Series 2017-2, as owner of the Related Mortgage Loan

Charles Norris, Individually, as Legal Heir or
 Devisee of the Estate of Mary Frances Norris a/k/a
 Mary Norris a/k/a Mary Frances Greer Norris,
 Deceased; Carnie Norris, III, Individually, as Legal
 Heir or Devisee of the Estate of Mary Frances
 Norris a/k/a Mary Norris a/k/a Mary Frances Greer
 Norris, Deceased; Clyde Norris, Individually, as
 Legal Heir or Devisee of the Estate of Mary
 Frances Norris a/k/a Mary Norris a/k/a Mary
 Frances Greer Norris, Deceased, their heirs or
 devisees, successors and assigns, and any other
 Heirs-at-Law or Devisees of the Estate of Mary
 Frances Norris a/k/a Mary Norris a/k/a Mary
 Frances Greer Norris, Deceased; all unknown
 persons with any right, title or interest in the real
 estate described herein; also any persons who may
 be in the military service of the United States of
 America, being a class designated as John Doe;
 any unknown minors or persons under a disability
 being a class designated as Richard Roe; and
 Douglas Miller, Sr.

[Exhibit 3]

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: Scott and Corley, P.A.	Attorney for : <input checked="" type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant or <input type="checkbox"/> Self-Represented Litigant
--------------------------------------	--

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRCP; Rule 41(a), SCRCP (Vol. Nonsuit); Rule 43(k), SCRCP (Settled); Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRCP; Bankruptcy; Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other
- STAYED FOR BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded; Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.
 Additional Information for the Clerk :

The property which is the subject of this action shall be sold at public sale pursuant to the Master in Equity's Report and Judgment of Foreclosure and Sale.

FILED
 APR - 22 PM 3:22
 CLERK OF COURT
 SPARTANBURG COUNTY
 ARMY BOX

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
N/A		

(11)

ELECTRONICALLY FILED - 2024 Mar 01 3:36 PM - SPARTANBURG - COMMON PLEAS - CASE#2023CP4203390

State of South Carolina
County of Spartanburg

Federal Home Loan Mortgage
Corporation, as trustee for
Freddie Mac Seasoned Credit
Risk Transfer Trust, Series
2017-2, as owner of the
Related Mortgage Loan,
Plaintiff

vs
Charles Morris, defendant,
et al

Common Pleas
2023-CP-42-03390

Motion To Alter/
Amend Judgment
59(e)

[Exhibit 4]

The defendant Carrie Morris ~~III~~
hereby file this 59(e) motion to alter/
amend it's judgment for the following
reasons:

A foreclosure hearing was held on
February 29, 2024 at 3:30pm before the
Honorable Shannon M. Phillips, Master
in Equity for Spartanburg. This hearing
was held using remote communication
technology (webex).

Gyton Murrell was in attendance
for Scott + Corley and Federal Home Loan
Mortgage Corporation, along with Douglas
Miller, Sr. and Tom C. Cohean (GAH
Carrie Morris ~~III~~) (13)

(1)

RECEIVED

MAR 15 2024

PCI MAILROOM

During the course of the hearing, Murrell and Douglas Miller Sr. was give the opportunity to state their complaint to the Master in Equity. Corrine Morris was not given the opportunity to rebut and/or state his case/complaint because the GAL representing him agreed with the offered testimony by the plaintiffs, without Morris consent.

+ Did the Master in Equity and the GAL representing the defendant Corrine Morris failed to provide procedural due process rights by failing to allow him to submit credible evidence and arguments pertaining to two critical documents submitted for review?

+ Was the defendant Corrine Morris procedural due process rights violated in the hearing because he is incarcerated and indigent?

when the defendant Morris found out that a hearing would be held, he sent documents to the GAL Bohan showing that fraud have been committed in this case showing that the defendant's Charles & Clyde Morris willfully concealed/destroyed Mary F. Morris LW & T. See attached letter

GAL Cohean have never conferred with defendant Carrie Morris other than letting him know that he was the GAL assigned to this case. GAL Cohean have not and did not represent the best interest of defendant Morris by waiving testimony in the hearing that could have been rebutted by the documents presented to him by Morris.

Based upon the documents submitted and presented to GAL Cohean, he did not conduct an independent, balanced and impartial investigation to determine the facts relevant to this case. GAL Cohean did not interview anybody that had personal knowledge about this case of fraud. GAL failed to talk to or interview attorney Zandra J. Scott, Gary Poliakoff and David H. Walsh, esquire.

GAL Cohean did not submit to the Master in Equity a brief, statement, a report or recommendation on the record in a manner consistent with the S.C. Rules of Evidence and other state law. GAL Cohean did not preserve for appellate review any viable objection, thereby waiving Defendants right to be heard.

GAL Goleon was instructed to request this case be transferred to the Spotsylvania County Probate Court to settle any and all claims and debts, because of the fraud committed by Charles & Clyde Morris.

* Defendant Morris did not waive anything on the record, because he was not given the opportunity by the Master in Equity to respond and/or object to testimony by the plaintiffs, only the GAL was acknowledge during the course of the hearing.

* Defendant Morris is requesting this Honorable Master in Equity to alter/ amend #7, #8 and #22 of the order for the above reasons. A fundamental right triggers strict scrutiny to determine whether defendant Morris was denied procedural due process of law and the Equal Protection Clause of the 14th Amendment.

Defendant have filed this pleading because of the act and omissions of the GAL. If GAL entirely fail to subject the Foreclosure case to meaningful adversarial testing, as in the case at bar, there has been a denial of Sixth Amendment rights which makes adversary process itself presumptively unreliable.

The defendant Carine Morris respectfully request the Master in Equity to construe his pleading liberally and not be held to lawyer standards because of non-consultation with an attorney.

Carine Morris

State of South Carolina
County of Spartanburg

Common Pleas
2023-CP-42-03390

Federal Home Loan Mortgage
Corporation, as trustee for
Freddie Mac Seasoned Credit
Risk Transfer Trust, Series
2017-2, as owner of the
Related Mortgage Loan,
Plaintiff

Certificate
of
service

vs
Charles Morris, defendant
et al

The defendant Carnie Morris III, certify
that he have served the below plaintiffs with
a copy of his Motion to Alter/Amend by
placing a copy in the Perryworkroom hands
for mailing, addressed as follows, postage
prepaid.

Ion Bohan (CAL)
Attorney Athaw
325 Rocky Slope Rd
Greenville, S.C.
29607

Scott & Corley, P.A.
P.O. Box 2005
Columbia, S.C. 29204

I, Carnie Morris III, certify and verify under
the penalty of perjury that the foregoing is
true and correct.

RECEIVED

MAR 15 2024

PCI MAILROOM

Carnie Morris III

(18) (6)

MASTER IN EQUITY
EQUITY COURT
SPARTANBURG COUNTY JUDICIAL CENTER
180 MAGNOLIA STREET, 4TH FLOOR
SPARTANBURG, SOUTH CAROLINA 29306

MAILING ADDRESS
PO BOX 5666
SPARTANBURG, SC 29304-5666
Website: www.spartanburqcounty.org/Master-in-Equity

Shannon M. Phillips
Judge

Telephone (864) 596-2501
Fax Number (864) 596-2078

March 20, 2024

Carnie Norris #227226
Perry Correctional Institution Q4B-220
430 Oaklawn Road
Pelzer, SC 29669

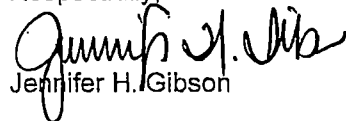
[Exhibit 5]

Re: Federal Home Loan Mortgage Corporation v. Charles Norris, et al
Case Number: 2023-CP-42-3390

Dear Mr. Norris:

Our office is in receipt of your Motion to Alter/Amend Judgment. We are returning these documents to you. We have been advised by Court Administration that this Motion to Alter/Amend Judgment will need to be filed with the Spartanburg County Clerk of Court, along with the required \$25.00 filing fee. The address for the Clerk of Court is Post Office Box 3483, Spartanburg, SC 29304.

Respectfully,


Jennifer H. Gibson

/jhg
Enclosure

[Exhibit G]

4B220

296 296 29669 NT-21
 U.S. POSTAGE PAID
 GREENVILLE SC
 PERMIT# 113
 4040240320 - 161121323
 2 RETURN SERVICE REQUESTED
 29669

MASTER IN EQUITY
 EQUITY COURT
 SPARTANBURG COUNTY JUDICIAL CENTER
 180 MAGNOLIA STREET, 4th FLOOR
 SPARTANBURG, SOUTH CAROLINA 29306

TO: Carnie Norris #227226
 Perry Correctional Institution Q4B-220
 430 Oaklawn Road
 Pelzer, SC 29669

RECEIVED
 MAR 25 2024
 PCI MAILROOM

(20)

STATE OF SOUTH CAROLINA,)
)
)
Federal Home Loan)
Mortgage Corporation)
Plaintiff)

[Exhibit 7]

MOTION AND AFFIDAVIT TO
PROCEED IN FORMA PAUPERIS

vs.)
Charles Morris, et al)
Defendant.)

FILE NO. 2023-CP-42-3390

I, Cornie Morris III being duly sworn, state that I am the defendant and that I do not have the funds available to pay the costs of filing and service in the present matter. I hereby request 590 motion be filed and service made without costs.

Sworn to and Subscribed before me)
this 26 day of March, 2024)
Jamarc Conwell)
Notary Public for South Carolina)
My Commission Expires)
My Commission expires October 6, 2033)

Leanne Morris)
Signature of Plaintiff or)

ORDER

- Leave is *granted* to proceed in forma pauperis without payment of the filing fee.
- Leave is granted to proceed in forma pauperis without payment of the service costs.
- Leave is *denied* to proceed in forma pauperis.

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

2024 APR -1 PM 4:10

FILED

Dated: 4/1, 24
Spartanburg, South Carolina

Sharon Phillips
JUDGE/CLERK OF COURT

State of South Carolina
County of Spartanburg

Federal Home Loan Mortgage
Corporation, as trustee for
Freddie Mac Seasoned Credit
Risk Transfer Trust, Series
2017-2, as owner of the
Related Mortgage Loan,
Plaintiff

vs
Charles Morris, defendant,
et al

Common Pleas
2023-CP-42-03390

Motion To Alter/
Amend Judgment
59(e)

[Exhibit 7]

The defendant Carrie Morris ~~III~~
hereby file this 59(e) motion to alter/for
amend it's judgment for the following
reasons:

A foreclosure hearing was held on
February 29, 2024 at 3:30pm before the
Honorable Shannon M. Phillips, Master
in Equity for Spartanburg. This hearing
was held using remote communication
technology (webex).

Gyton Murrell was in attendance
for Scott + Corley and Federal Home Loan
Mortgage Corporation, along with Douglas
Miller, Sr. and Tom C. Gohran (GAH for
Carrie Morris ~~III~~)

(22) (1)

FILED
CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX
FEB 29 - 1 PM 3:24

During the course of the hearing, Anurvell and Douglas Ancker Sr. was give the opportunity to state their complaint to the Master in Equity. Corrine Morris was not given the opportunity to rebut and/or state his case/complaint because the GAL representing him agreed with the offered testimony by the plaintiffs, without Morris consent.

Did the Master in Equity and the GAL representing the defendant Corrine Morris failed to provide procedural due process rights by failing to allow him to submit credible evidence and arguments pertaining to two critical documents submitted for review?

Was the defendant Corrine Morris procedural due process rights violated in the hearing because he is incarcerated and indigent?

When the defendant Morris found out that a hearing would be held, he sent documents to the GAL Bohan showing that fraud have been committed in this case showing that the defendant's Charles & Clyde Morris willfully concealed/destroyed Mary F. Morris LW + T. See attached letter

(22) (2)

2025 APR -1 PM 3:21
CLERK OF COURT
SPARANBURG COUNTY
MARY W. COX

FILED

GAL Cohean have never conferred with defendant Corrie Morris other than letting him know that he was the GAL assigned to this case. GAL Cohean have not and did not represent the best interest of defendant Morris by waving testimony in the hearing that could have been rebutted by the documents presented to him by Morris.

Based upon the documents submitted and presented to GAL Cohean, he did not conduct an independent, balanced and impartial investigation to determine the facts relevant to this case. GAL Cohean did not interview anybody that had personal knowledge about this case of fraud. GAL failed to talk to or interview attorney Zandra J. Scott, Gary Poliakoff and David H. Walsh, esq.

GAL Cohean did not submit to the Master in Equity a brief, statement, any report or recommendation on the record in a manner consistent with the S.C. Rules of Evidence and other state law. GAL Cohean did not preserve for appellate review any viable objection, thereby waiving Defendants right to be heard.

FILED
2024 APR -1 PM 3:54
CLERK OF COURT
SPARTANBURG COUNTY
SOUTH CAROLINA

GAZ Goleon was instructed to request this case be transferred to the Spartanburg County Probate Court to settle any and all claims and debts, because of the fraud committed by Charles & Clyde Morris.

Defendant Morris did not waive anything on the record, because he was not given the opportunity by the master in Equity to respond and/or object to testimony by the plaintiffs, only the GAL was acknowledge during the course of the hearing.

Defendant Morris is requesting this Honorable Master in Equity to alter/ amend #7, #8 and #22 of the order for the above reasons. A fundamental right triggers strict scrutiny to determine whether defendant Morris was denied procedural due process of law and the Equal Protection Clause of the 14th Amendment.

Defendant have filed this pleading because of the acts and omissions of the GAL. If GAL entirely fail to subject the Foreclosure case to meaningful adversarial testing, as in the case at bar, there has been a denial of Sixth Amendment rights which makes adversary process itself presumptively unreliable.

FILED
2024 APR - PM 3:22
CLERK OF COURT
SPARTANBURG COUNTY
AMN: CO

The defendant Carnue Morris respectfully request the Master in Equity to construe his pleading liberally and not be held to lawyer standards because of non-consultation with an attorney.

Carnue Morris

3-15-24

FILED

2024 APR - 1 PM 3:24

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

STATE OF SOUTH CAROLINA)
)
COUNTY OF SPARTANBURG)

IN THE COURT OF COMMON PLEAS

Federal Home Loan Mortgage Corporation,)
as trustee for Freddie Mac Seasoned Credit)
Risk Transfer Trust, Series 2017-2, as owner)
of the Related Mortgage Loan,)

Case No. 2023CP4203390

PLAINTIFF,)

ORDER DENYING MOTION TO ALTER/
AMEND JUDGMENT 59(e)

VS.)

Charles Norris, Individually, as Legal Heir)
or Devisee of the Estate of Mary Frances)
Norris a/k/a Mary Norris a/k/a Mary)
Frances Greer Norris, Deceased; Carnie)
Norris, III, Individually, as Legal Heir or)
Devisee of the Estate of Mary Frances)
Norris a/k/a Mary Norris a/k/a Mary)
Frances Greer Norris, Deceased; Clyde)
Norris, Individually, as Legal Heir or)
Devisee of the Estate of Mary Frances)
Norris a/k/a Mary Norris a/k/a Mary)
Frances Greer Norris, Deceased, their heirs)
or devisees, successors and assigns, and any)
other Heirs-at-Law or Devisees of the)
Estate of Mary Frances Norris a/k/a Mary)
Norris a/k/a Mary Frances Greer Norris,)
Deceased; all unknown persons with any)
right, title or interest in the real estate)
described herein; also any persons who may)
be in the military service of the United)
States of America, being a class designated)
as John Doe; any unknown minors or)
persons under a disability being a class)
designated as Richard Roe; and Douglas)
Miller, Sr.,)

DEFENDANT(S).)

[Exhibits]

A Rule 59(e) SCRCF motion to reconsider and to alter or amend has been filed with the Court. A hearing was held via WebEx on April 22, 2024 at 2:30 p.m. Guyton Murrell appeared on behalf of Plaintiff. Ian Gohean appeared as Guardian Ad Litem for Carnie Norris. Carnie Norris appeared.

After careful consideration of the able arguments and filings of the Parties and review of the record, the Court is unable to discover any material fact or principle of law that either has been overlooked or disregarded and further finds no error of law or fact not appropriately considered. Accordingly, the Motion for Reconsideration made pursuant to Rule 59, SCRCP is DENIED. The Motion is also denied because it was not filed until April 1, 2024, thirty-one days after electronic notice of the Order was issued.



Spartanburg Common Pleas

Case Caption: Federal Home Loan Mortgage Corporation , plaintiff, et al VS Charles Norris , defendant, et al
Case Number: 2023CP4203390
Type: Master/Order/Other

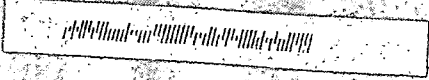
IT IS SO ORDERED.

s/ Shannon M. Phillips - 3087

Electronically signed on 2024-04-22 15:28:45 page 3 of 3

ELECTRONICALLY FILED - 2024 Apr 22 3:45 PM - SPARTANBURG - COMMON PLEAS - CASE#2023CP4203390

Carnice Morris #227026
Perry Corr. Inst, Q4B-220
430 Callaway Rd
Pelzer, S.C. 29669



RECEIVED
AUG 02 2024
FBI MAILROOM

RECEIVED
AUG 09 2024
SC Court of Appeals

Infer Agency

S.C. Court of Appeals
Lenny Abbott Kitchens, Clerk
P.O. Box 11629
Columbia, S.C. 29211