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Oct 22 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Bentley Price, Circuit Court Judge

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Case No. 2023-001598

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Karen Oliver

Appellant,

v.

Charleston County Housing and  
Redevelopment Authority

Respondent,

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MOTION

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Comes now the Appellant due to the continued violations of the Bond to Stay, the Lease page 12 Section 14, and the Cease and Desist and is asking the Court's indulgence for more time. The Respondent's have sent another Notice of Termination of Lease and an eviction date of 11/9/24. Please see Attachment One. The Appellant has asked the counsel for the Respondent to advise them of their continuous violation and even sent a Cease and Desist (contained in the previous motion), but to no avail. The Bond to Stay's recording clearly detailed the provisions at the 17:00 time mark. The Respondent's actions continue to violate these provisions. It is also a violation of state law - S.C. Code 27-40-220 *Operating in Good Faith*. Their actions are clearly a violation of them. It has and still is taking a toll on my recovery. I am pleading with the Court to

stop these continued violations of the Rules of Professional that the Respondent's attorneys have sworn to uphold. Rules 1.2 (d), RPC, Rule 407, SCACR and 8.4 (a) (d) (e), RPC, Rule 407, SCACR and advise their client to stop breaking the laws because it is unconscionable. The Appellant should not have to face continued Gaslighting, Harassment, Intimidation, Abuse of Process, Negligent Supervision, Negligence, and Incompetence. The Appellant has experienced setbacks due to the stress incurred in the recovery process. If the Respondent will just stop doing the aforementioned violations the Appellant can provide the Court with the Final Brief and other requirements for submission. Otherwise, the Appellant will need time to heal due to these continued unconscionable actions by the Respondent. It is now another 60 days in addition to the last motion detailing the Cease and Desist 60-day request totaling 120 days. It is not unreasonable due to the continued bold violations of the laws and the order of the magistrate.

October 22, 2024



Karen Oliver Pro Se  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 303-3410



Charleston County Housing and Redevelopment Authority  
2106 Mt. Pleasant Street, Charleston, South Carolina 29403  
(843) 722-1942 Fax (843) 577-8825 TDD (800) 735-2905



**Agency Award of  
Excellence**

10/09/2024

Karen Oliver  
1945 Ghana St.  
Johns Island, SC 29455

**NOTICE OF TERMINATION FOR NONPAYMENT OF RENT AND/OR OTHER CHARGES**  
**Amount Due: \$ 24,345.00**

This notice of termination has been brought about because our records show that your account is unpaid and is now delinquent. You have failed to make payments on or before the due date, which is considered a serious violation of the material terms of your lease agreement.

You have failed to comply with the terms and provisions of your dwelling lease with the Charleston County Housing and Redevelopment Authority (CCHRA). As a result, we are terminating your lease effective 11/09/2024 and you MUST VACATE THE PREMISES ON OR BEFORE 11/09/2024 AND RETURN YOUR KEYS TO THE PROPERTY MANAGER ON OR BEFORE 11/09/2024, for the following reason(s):

*Paragraph 1.* By signing this lease Tenant agrees to all terms and conditions of this lease.

*Paragraph 2.* Tenant agrees to pay a rent per their lease agreement on the first day of the month.

*Paragraph 7.X:* Resident agrees to pay when due all charges due under this lease.

*Paragraph 12.A:* Management shall not terminate or refuse to renew this lease other than for serious or Repeated violations of material terms of the lease such as:

1. Failure to make payments due under this lease or to fulfill obligations of resident set forth in this lease or for other good cause.

If you have already made your payment, we would appreciate this being brought to our attention. If payment has not been made, we encourage you to take care of this matter immediately to avoid losing your home. Please remember to add the appropriate late fee(s) when mailing payments or using the drop box.

Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
October 22, 2024

Carlton Bowers  
Theodore Parker III  
PN & Associates, CTHD  
320 Broad Street  
Suite 240  
Charleston, SC 29401

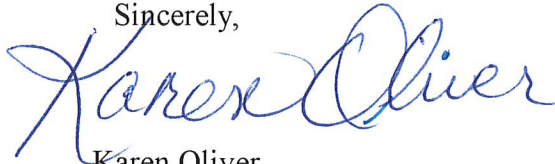
RE: Case No. 2023-001598

Subject: **Continued** refusal to adhere to the Bond to Stay, Ignoring the Cease and Desist along with violating S.C. Code § 27-40-220 *Obligation of Good Faith*, etc.

Dear Carlton and Theodore,

I am submitting this correspondence to acknowledge your client's **continued** refusal to adhere to the Bond to Stay that was ordered by Magistrate Laura Waring on 09-27-22. I have issued a Cease and Desist asking for the adherence to the Bond to Stay and the provisions of it provided at the 17:00 time mark that is on the recording of the proceeding. You and your client have refused to comply with the magistrate's order once again. It has caused a great deal of strife in our lives. My health component has once again been compromised. Please advise your client to STOP THE GASLIGHTING, HARASSMENT, INTIMIDATION, NEGLIENT SUPERVISION, NEGLIGENCE, ABUSE OF PROCESS, INCOMPETENCE that is still being illegally done to my family and me. This is again in violation of the Bond to Stay. Once again, due to my health concerns and overall well-being not limited to the loss of enjoyment a demand is being made for all of the GASLIGHTING, HARASSMENT, INTIMIDATION, NEGLIENT SUPERVISION, NEGLIGENCE, ABUSE OF PROCESS, INCOMPETENCE to stop immediately. I now have no other choice but to seek remedies for these violations of the Bond to Stay after the Cease and Desist has been willfully and wantonly ignored. I am also motioning for an additional 60 days from the Court of Appeals due to the upheaval you and your client are causing to our well-being. I am still recovering. You and your clients' actions are hindering my recovery. I will contact the Office of Disciplinary Counsel if necessary. If it happens before the now requested two 60-day extensions (120-days) due to these gross violations of the Bond to Stay and S.C. Code § 27-40-220 *Obligation of Good Faith*. Also, Rules 1.2 (d), RPC, Rule 407, SCACR and 8.4 (a) (d) (e), RPC, Rule 407, SCACR. If you know that your client is violating the Bond to Stay you have a legal obligation to let them know and to not continue the illegal actions. Otherwise, you are in violation of the Rules of Professional Conduct. Therefore, a request to the Court of Appeals for another extension for time is being made. **Please advise your client to act within the laws of the state of South Carolina.**

Sincerely,

A handwritten signature in blue ink that reads "Karen Oliver". The signature is written in a cursive style with a large, stylized initial "K".

Karen Oliver

Enclosure:

Motion and Proof of Service

CC:

Court of Appeals

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Case No. 2023-001598

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Karen Oliver

Appellant,

v.

Charleston County Housing and  
Redevelopment Authority

Respondent,

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PROOF OF SERVICE

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I certify that I have served a copy of the Motion on Charleston County Housing and Redevelopment Authority by depositing a copy of it in the United States Mail, postage prepaid, on October 22, 2024, addressed to Attorneys Theodore Parker III and a copy sent to Carlton Bowers of Parker Nelson and Associates, CTHD 320 Broad Street Suite 240 Charleston, SC 29401.

October 22, 2024

/s/ Karen Oliver  
Karen Oliver, Pro Se  
1945 Ghana Street  
Johns Island, S.C. 29455  
(843) 303-3410

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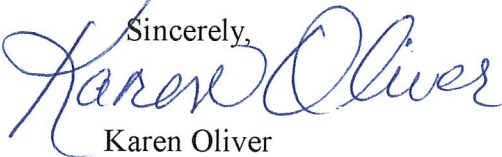
Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 303-3410  
October 22, 2024

S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Case No. 2023-001598  
Karen Oliver, Appellant  
v.  
Charleston County Housing Authority, Respondent

Dear Clerk of Court:

I am submitting this motion to the Court. Due to the continued violation of the Bond to Stay, the lease, the Cease and Desist, and the laws of the state of S.C. by the Respondent the Appellant is making this submission. Please let me thank you in advance.

Sincerely,  
  
Karen Oliver

Enclosure  
Motion and Proofs of Service