

MAR 15 2024

(9)

(9)

Lawrence

RECEIVED

the property of person that the foregoing is

I, Corine Morris III, certify and verify under the penalty of perjury that the foregoing is

29607

Greenville, S.C.

325 Rocky Slope Rd

Attorney At Law

Jon Bohannan (GA)

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

prepared.

for waiting, addressed as follows, postage

placing a copy in the Pennsylvania bonds that he have served the below plaintiffs with a copy of his motion to Alter/Amend by The defendant Corine Morris III, certify

SC Court of Appeals

AUG 09 2024

RECEIVED

Exhibit 1

Service

of Certificate

Common Pleas
2023-CP-42-033 80

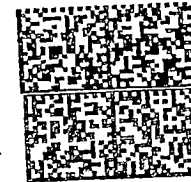
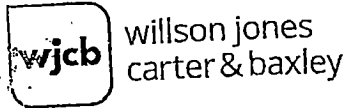
State of South Carolina
County of Spartanburg
Federal Home Loan Mortgage Corporation, as trustee for Freddie Mac Seasoned Credit Risk Transfer Trust, Series 2017-2, as owner of the Related Mortgage Loan Plaintiff
vs
Charles Morris, defendant et al

(10)

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

4 B220

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



quadiant
FIRST-CLASS MAIL
IMI
\$000.88⁰
03/06/2024 ZIP 29607
043M30222401

US POSTAGE

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MAR 11 2024

PCI MAILROOM

[Exhibit 2]

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

FORM 4

JUDGMENT IN A CIVIL CASE

CASE NO. 2023-CP-42-03390

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), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled); Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; 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 SO 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.

CLERK OF COURT
 SPARTANBURG COUNTY
 APR 11 3:29 PM '23
 AMY

FILED

| 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

FILED

2024 APR - 1 PM 3: 25

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

Clerk of Court

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Fileers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

(12)

This judgment was entered on the _____ day of _____, 20____, and a copy mailed first class or placed in the appropriate attorney's box on this _____ day of _____, 20____, to attorneys of record or to parties (when appearing pro se) as follows:

Scott and Corley, P.A.
P.O. Box 2065
Columbia, SC 29204
Ian C. Gohean (GAL for Carnie Norris, III)
325 Rocky Slope Road, Suite 201
Greenville, SC 29607
Charles Norris
13 Willow Run Terrace
Spartanburg, SC 29303
Clyde Norris
133 Canterbury Road
Spartanburg, SC 29302
Douglas Miller, Sr
105 Caldwell Drive
Spartanburg, SC 29306
Attorney for Defendant(s)

Attorney for Plaintiff

For Clerk of Court Office Use Only

Shannon M. Phillips, Master in Equity
Judge Code
Date

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.
E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

| | |
|---|--|
| If applicable, describe the property, including tax map information and address, referenced in the order: TMS No. 7-04-11-042.00 Property address: 305 Foxborough Road, Spartanburg, SC 29303 | |
| | |
| | |

MAR 15 2024

RECEIVED

641

(1) (13) rnie Morris

The defendant Cornie 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 A. Phillips, Master in Equity for Spartanburg. This hearing was held using remote communication technology (Zoom).

Gyton Murray was in attendance for Scott & Corley and Federal Home Loan Mortgage Corporation, along with Douglas Miller, Sr. and Lane Cohen (GAH).

[Exhibit 4]

Motion to Alter/Amend Judgment 59(e)

Common Pleas 2023-CP-42-03390

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 Debted Mortgage Loan 1 Plaintiff
 vs
 Charles Morris, defendant, et al

Cornie Morris et al
Miller, Sr and Tom, Gordon (GA) for
Mortgage Corporation, along with Douglas
for Scott & Corley and Federal Home Loan
Mortgage Corp.

FILED

APR 1 PM 3:22
CLERK OF COURT
Spartanburg County
Spartanburg, S.C.
AMY W. COX

Byron Murray was in attendance
technology (Webex).
was held using remote communication
in Equity for Spartanburg. This hearing
Honorable Shannon M. Phillips, Master
February 27, 2024 at 3:30pm before the

A foreclosure hearing was held on
reasons:
amend its judgment for the following
hereby file this 59(c) motion to alter/
The defendant Cornie Morris et al

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

[Exhibit 7]

Motion to Alter/
Amend Judgment
59(c)

Common Pleas
2023-CP-42-03390

FILED

2024 APR - 1 PM 3:21

CLERK OF COURT
SPRINGFIELD, MISSOURI
AMY W. COX

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

Did the Master in Equity and the GAL representing the defendant Corine Adams 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 Corine Adams procedural due process rights violated because he is incarcerated in the hearing and indigent?

When the defendant Adams found that a hearing would be held, he sent documents to the GAL before showing that fraud have been committed in this case showing that the defendant's Charles telephone Adams willfully concealed/destroyed Mary F. Adams LW 47. See attached letter (2) (2)

GAL Cohen have never conferred with defendant Conie Morris other than letting him know that he was the GAL assigned to this case. GAL Cohen 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 Cohen, he did not conduct an independent, balanced and impartial investigation to determine the facts relevant to this case. GAL Cohen did not interview anybody that had personal knowledge about this case of fraud. GAL failed to talk to interviewed attorney Zandra J. Scott, Esq. and Gary Pollock and David. Welsh, Esq. GAL Cohen did not submit to the report in Equity a brief, statement, and report or recommendation on the record in a manner consistent with the S.C. Rules of Evidence and other state law. GAL Cohen did not preserve for appellate review any viable objection, thereby violating defendant's right to be heard.

FILED

2024 APR - 1 PM 3:24
CLERK OF COURT
SPARANBURG COUNTY
JAN 1 W. COX

GA2 Colson 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 or object to testimony by the plaintiffs, only the GA2 was acknowledged during the course of the hearing.

Defendant Morris is requesting this Honorable Master in Equity to affirm and #7, II and #2 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 in request of the affirmative relief of the Foreclosure Case to meaningful adversarial testing, as in the case at bar, there has been a denial of 5:17th Amendment rights which makes adversary process itself presumptively unreliable.

FILED
2021 APR - PM 3: 24
CLERK OF COURT
SPARTANBURG COUNTY
AMY L. COO

(5) (87)

FILED

2024 APR -1 PM 3:24

CLERK OF COURT
SPARTANBURG COUNTY
AMY W. COX

3-15-24

James Morris

The defendant James 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.

IN THE COURT OF COMMON PLEAS

Case No. 2023CP4203390

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

[Exhibit 8]

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 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).

A Rule 59(e) SCRPC 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.

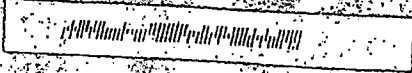
s/ Shannon M. Phillips - 3087

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
Perryman, East, Q4B-220
430 Callaway Rd
Pebble, S.C. 29669

US POSTAGE
\$002.87
AUG 09 2024



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AUG 02 2024
PCI MAILROOM

RECEIVED
AUG 09 2024
SC Court of Appeals

Tracy A. Green

S.C. Court of Appeals
Henry Abbott Kitchings, Clerk
P.O. Box 11629
Columbia, S.C. 29211

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 Cohen 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
(14) (2)

GAL Cohen have never conferred with defendant Comie Morris other than letting him know that he was the GAL assigned to this case. GAL Cohen 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 Cohen, he did not conduct an independent, balanced and impartial investigation to determine the facts relevant to this case. GAL Cohen did not interview anybody that had personal knowledge about this case of fraud. GAL failed to talk to or interview attorney Sandra J. Scott, Gary Pollock and David. Walsh, Esquire.

GAL Cohen did not submit to the Master in Equity a brief, statement, and report or recommendation on the record in a manner consistent with the S.C. Rules of Evidence and other state law. GAL Cohen did not preserve for appeal the review and viable objection, thereby violating defendant's right to be heard.

GAL Colson was instructed to request this case be transferred to the Spartenburg County Probate Court to settle any and all claims and debts, because of the fraud committed by Charles + Clyde Morris. Defendant Morris did not voice anything on the record, because he was not given the opportunity by the Master in Equity to respond 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 affirm and #7, #8 and #2 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 actor's omissions of the GAL. If GAL actually fail to subject the Foreclosure case to meaningful adversarial testing, as in the case at bar, there has been a denial of 5th Amendment rights which makes adversary process itself preeminently unreliable.

The defendant Carme 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.

Carme 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 Corrine 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 Perry workroom hands
for mailing, addressed as follows, postage
prepaid.

Ion Bohem (GAL)
Attorney At Law
325 Rocky Slope Rd
Greenville, S.C.
29607

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

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

RECEIVED

MAR 15 2024

PCI MAILROOM

Corrine Morris

(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.spartanburgcounty.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-41

U.S. POSTAGE PAID
GREENVILLE SC
PERMIT# 113

4040240320-161121323

RETURN SERVICE REQUESTED

2

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

(20)

RECEIVED
MAR 25 2024
PCI MAILROOM

(2)

South Carolina *Spartanburg*

Dated: 4/1, 24

JUDGE/CLERK OF COURT

CLERK OF COURT
SPARTANBURG COUNTY
AMM.W. COX

2024 APR - 1 PM 4:10

FILED

- Leave is granted 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.

ORDER

Sworn to and Subscribed before me this 01 day of March, 2024

Loraine Lewis
Notary Public for South Carolina
My Commission Expires October 6, 2033
My Commission expires

Signature of Plaintiff or

Loraine Lewis

hereby request: ~~5~~ *3* ~~re~~ *re* motion be filed and service made without costs.

I do not have the funds available to pay the costs of filing and service in the present matter. I

I, *Loraine Lewis* being duly sworn, state that I am the ~~defendant~~ and that

FILE NO. 2023-CR-42-330

Defendant: Charles Morris, et al

MOTION AND AFFIDAVIT TO
PROCEED IN FORMA PAUPERIS

Plaintiff: Federal Home Loan Mortgage Corporation

STATE OF SOUTH CAROLINA,

[Exh: 6, 7]

SC Court of Appeals

NOV 18 2024

RECEIVED

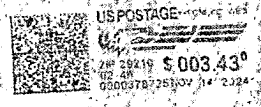
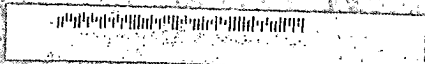
James H. ...
11-8-24

I, Corinne Morris III certify that the
under the authority of going that the
foregoing is true and correct.

T. Richard McPherson
Acquaintances
201 N. Tryon St. Suite 3000
Charlotte, N.C. 28202-2146

I, Corinne Morris III certify that I
have served the Respondent a copy
of my Reply Brief by placing a copy in
the Party Mailroom/Receivables for mailing,
postage prepaid, addresses as follows:

Certificate of Service



Carrie Harris 222e
Perry Court East 44B-32e
430 Oakburn Rd
Pelzer, S.C. 29669

RECEIVED
NOV 18 2024
SC Court of Appeals

RECEIVED
NOV 12 2024
FCI MAILROOM

Inter Agency

S.C. Court of Appeals
Henry Abbott Kitchings, Clerk
Post Office Box 11624
Columbia, S.C. 29211