

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE DANIEL COBLE  
CIRCUIT COURT JUDGE

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APPELLATE CASE NO. 2024-001529  
CIVIL ACTION NO. 2023-CP-40-05766

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Palmetto Citizens Federal Credit Union,

**RESPONDENT,**

versus

Keiven Keon Minter,

**APPELLANT.**

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**RESPONDENT’S RETURN TO APPELLANT’S NOTICE OF REQUEST FOR  
THE ORDER TO BRING ABOUT THE CORRECTION OF ALL ATTORNEY  
ERRORS AND PROCEDURAL DEFICIENCIES TO BE INCLUDED IN THE  
RECORD ON APPEAL**

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Palmetto Citizens Federal Credit Union, Respondent in the above referenced matter, hereby files this Return and objects to any relief sought in Appellant Keiven Keon Minter’s document entitled “Notice of Request for the Order to Bring About the Correction of All Attorney Errors and Procedural Deficiencies to be Included in the Record on Appeal.”

The case was pending below in the Court of Common Pleas for Richland County. The Honorable Daniel Coble heard argument on the parties’ cross-motions for summary

judgment. Judge Coble granted Respondent’s motion for summary judgment and denied Appellant’s motion for summary judgment. Appellant filed an appeal of Judge Coble’s motion for summary judgment in favor of Respondent and filed his Initial Appellant’s Brief with this Court on or about November 15, 2024. Respondent filed its Initial Respondent’s Brief on or about January 13, 2025.

The arguments before this Court are confined to the issues Appellant raised in his Initial Appellant’s Brief. State v. Dunbar, 356 S.C. 138, 142, 587 S.E.2d 691, 694 (2003) (“No point will be considered which is not set forth in the statement of issues on appeal.”); Rule 208(b)(1)(B), SCACR (providing that no issue will be considered which is not set forth in the statement of issues on appeal).

Appellant’s purported motion raises issues beyond that considered by Judge Coble and those raised by Appellant in his Initial Appellant’s Brief. There is no basis for this Court to consider and grant any relief sought in Appellant’s motion. Accordingly, Respondent requests this Court to deny the relief sought in Appellant’s “Notice of Request for the Order to Bring About the Correction of All Attorney Errors and Procedural Deficiencies to be Included in the Record on Appeal.”

*[signature on following page]*

Respectfully submitted,

/s Carmen V. Ganjehsani

S. Nelson Weston, Jr. (S.C. Bar No. 12902)

Carmen V. Ganjehsani (S.C. Bar No. 73515)

Katherine E. Engels (S.C. Bar No. 105389)

RICHARDSON, PLOWDEN & ROBINSON, PA

1900 Barnwell Street (29201)

Post Office Drawer 7788

Columbia, South Carolina 29202

(803) 771-4400

[nweston@richardsonplowden.com](mailto:nweston@richardsonplowden.com)

[cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com)

[kengels@richardsonplowden.com](mailto:kengels@richardsonplowden.com)

**ATTORNEYS FOR RESPONDENT  
PALMETTO CITIZENS FEDERAL  
CREDIT UNION**

February 3, 2025.

RECEIVED

Feb 03 2025

SC Court of Appeals

**CERTIFICATE OF SERVICE**

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Respondent Palmetto Citizens Federal Credit Union do hereby certify that I have this date served the foregoing Return to Appellant's Notice of Request for the Order to Bring About the Correction of All Attorney Errors and Procedural Deficiencies to be Included in the Record on Appeal, dated February 3, 2025, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable) and/or via U.S. Mail as indicated below:

Keiven Keon Minter  
6729 Two Notch Road  
Columbia SC 29223  
[kminter85@hotmail.com](mailto:kminter85@hotmail.com)  
**Appellant *pro se***

A copy of the sent email is enclosed with this Certificate of Service.

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani  
S.C. Bar No. 73515  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400

**ATTORNEYS FOR RESPONDENT  
PALMETTO CITIZENS FEDERAL  
CREDIT UNION**

Dated: February 3, 2025.


**From:** [Carmen Ganjehsani](#)  
**To:** [kminter85@hotmail.com](mailto:kminter85@hotmail.com)  
**Cc:** [Nelson Weston](#); [Katie Engels](#)  
**Subject:** 2024-001529 Palmetto Citizens v. Minter  
**Date:** Monday, February 3, 2025 11:16:00 AM  
**Attachments:** [2024-001529 Palmetto Citizens v. Minter \(Return to Mtn re Correction of Errors\) \(3627626\).pdf](#)

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Mr. Minter,

Please find served upon you Respondent Palmetto Citizens Federal Credit Union's Return to your most recent motion. We will also be serving a copy of this document via U.S. Mail at your address on file with the Court of Appeals.

Thank you,  
Carmen Ganjehsani

<a href="#">HOME</a>	<a href="#">VCARD</a>	<a href="#">LOCATION</a>
		<p><b>Carmen V. Ganjehsani</b> Shareholder <a href="mailto:Cganjehsani@RichardsonPlowden.com">Cganjehsani@RichardsonPlowden.com</a></p>
		<p><b>Richardson Plowden &amp; Robinson, P.A.</b> 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 <a href="http://www.RichardsonPlowden.com">www.RichardsonPlowden.com</a></p>

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