

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
9TH JUDICIAL CIRCUIT

Reverse Mortgage Solutions, Inc.
Plaintiff

Case # 2012-CP-10-4981

VS.

ANSWER
(Non-Jury Mortgage Foreclosure)

Elvenia Bowens, and United States of
America, acting by and through its agency
Agency Secretary of Housing and Urban
Development
Defendants

TO THE PLAINTIFF Above-named:

FOR A FIRST DEFENSE: Qualified General Denials

Every allegation in the complaint not admitted is deemed denied:

1. Admit
2. Admit
3. Admit
4. Admit
5. Admit
6. Admit
7. Admit
8. Admit
9. Admit
10. Admit only that Defendant is responsible for payments of all taxes, fire and other hazard insurance, water rates and other governmental or municipal charges, fines or impositions but denied that mortgagee might pay same
11. Lack knowledge or information
12. Denied because Mortgagee has acquired (and maintains) the necessary fire and hazard insurance coverage on property before Plaintiff instituted this action and that fact was given to plaintiff beforehand
13. Lack Knowledge or information
14. Admit
15. Denied because verifying fire and hazard insurance does not require the Plaintiff to incur any cost whatsoever
16. Lack Knowledge or information

BY

JULIE J. ARMSTRONG
CLERK OF COURT

2012 SEP -6 PM 1:12

FILED

[Exhibit 7]

FOR A SECOND DEFENSE: required insurance on property


Defendant acquired the required fire and hazard insurance on the property before the Plaintiff brought this action on July 31, 2012. Defendant has maintained this coverage since _____ on a monthly payment agreement with insurer and coverage is valid to-date.

FOR A THIRD DEFENSE: Plaintiff's duty to pay insurance, taxes, etc

In the event, according to _____ of Defendant's mortgage agreement, should the Defendant ever lacks fire or hazard insurance or fail to pay any taxes, assessment, fines or gov't assessment than the Plaintiff required to pay the cost of such insurance, taxes, assessment or fine and add such cost to the Defendant's principal loan balance should the Defendant still have equity in her home.

RELIEF,

1. Dismissal of Plaintiff's Complaint with re-instatement of Defendant's reverse mortgage
2. Mandate intervention into this action from Secretary of Housing and Urban Development on behalf of Defendant, Elvenia Bowens
3. Any other just relief



9-4-2012

Elvenia Bowens
Pro Se Defendant
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