

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY  
COURT OF COMMON PLEAS  
JUDGE ALAN CLEMMONS, MASTER-IN-EQUITY

APPELLATE CASE NO. 2024-001119

**SPECIALIZED LOAN SERVICING LLC...RESPONDENT**

V.

**Cindy B. Hunt; Willow Greens  
Homeowners Association, Inc.;  
CJ Developers, LLC.....Defendants,  
Of Whom Cindy B. Hunt is .....Appellant**

**INITIAL BRIEF AND DESIGNATION OF MATTER**

CINDY B, HUNT, PRO SE, SC BAR# 65408  
195 D WILLOW GREEN DRIVE  
CONWAY, SC 29526  
843 488-1131

**RECEIVED**  
MAR 21 2025  
SC Court of Appeals

INDEX

RECEIVED

MAR 21 2025

SC Court of Appeals

1. Orders/Judgments

<b>Lawsuit # 1 - 4:09-cv-02151</b>	
3/23/2011 Order (exhibit # 41)	Pages 1-16
11/29/2011 Order (exhibit # 39)	Pages 17-19
5/16/2012 Judgment/Unp Op (exhibit # 40)	Pages 20-27
6/26/2012 Order (exhibit # 40)	Page 28
<b>Lawsuit # 2 -4:11-cv-00870</b>	
3/13/2013 Order (exhibit # 52)	Pages 29-42
3/13/2013 Judgment (exhibit # 52)	Pages 43-44
<b>Lawsuit # 3 - 2012-CP-26-5264 &amp; 4:12-cv-02216</b>	
1/25/2013 RR (exhibit # 61)	Pages 45-49
3/13/2013 Order (exhibit # 43)	Pages 50-56
3/13/2013 Judgment (exhibit # 43)	Pages 57-58
<b>Lawsuit # 4 - 2013-CP-26-2528 &amp; 4:14-cv-04352</b>	
11/04/2013 General Order of Reference	Pages 59-62
5/6/2014 Scheduling Order	Pages 63-66
10/20/2014 Order re 6/6/2014 MFS <sup>1</sup>	Pages 67-70
10/22/2014 Order involving 8/2/2013 CC <sup>2</sup>	Pages 71-84
10/28/2014 Order re 9/30/2014 MFDJ, etc.(exhibit # 94)	Pages 85-90
11/25/2014 Order from USDC (exhibit # 101)	Pages 91-97
1/13/2015 Order (exhibit # 84)	Pages 98-112
4/15/2015 RR (exhibit # 85)	Pages 113-121

<sup>1</sup> The hearing on the MFS was held 9/17/2014. This appeal does not include the 10/20/2014 Order. The 10/20/2014 Order has an outstanding motion to alter or amend in the lower court.

<sup>2</sup> A hearing was held on several motions on 4/21/2014. This appeal does not include the 10/22/2014 Order. The 10/22/2014 Order has an outstanding motion to alter or amend in the lower court.

## Orders/Judgments continued

5/08/2015 Order of Remand (exhibit # 86)	Pages 122-129
5/11/2015 Order of Remand (exhibit # 87)	Pages 130-135
6/03/2015 Order re MFAFC (exhibit # 98)	Pages 136-138
6/15/2016 Order re the 11/10/2015 hearing on three motions:	
(1) 10/30/2014 MTAOA under Rule 59(e), SCRCP (re 10/28/2014 Order);	
(2) 8/11/2015 Motion: Lack of Jurisdiction, Rule 59 and 60, SCRCP (re 1/13/2015 Order); and	
(3) 8/11/2015 Motion: Lack of Jurisdiction, Rule 59 and 60, SCRCP (re 6/03/2015 Order).-	Pages 139-146

## 2. Pleadings

### Lawsuit # 1 - 4:09-cv-02151

8/31/2009 Amended Complaint Pages 147-154

5/20/2010 SA Complaint exhibit # 38 Pages 155-164

### Lawsuit # 2 -4:11-cv-00870

5/10/2011 Amended Complaint Pages 165-232

### Lawsuit # 3 - 2012-CP-26-5264 & 4:12-cv-02216<sup>3</sup>

7/9/2012 & 8/6/2012 Complaint & Index Pages 233-260

### Lawsuit # 4 - 2013-CP-26-2528 & 4:14-cv-04352<sup>4</sup>

4/16/2013 Complaint (Foreclosure) Pages 261-272

8/2/2013 Answer Pages 273-276

8/2/2013 Counterclaims Pages 277-298

---

<sup>3</sup> See 08/06/2012 Notice of Removal by BBT

<sup>4</sup> See 11/10/2014 Notice of Removal by Hunt

6/6/2014 First Amended Counterclaims (FAC) Pages 299-338

### **3. Pleadings / Motions to Dismiss (MTD)**

#### **Lawsuit # 1 – 4:09-cv-02151**

10/27/2009 MTD and Memorandum Pages 339-354

5/29/2010 MTD & Memorandum Pages 355-380

#### **Lawsuit # 2 -4:11-cv-00870**

6/19/2012 MTD<sup>5</sup> and Memorandum Pages 381-390

#### **Lawsuit # 3 – 2012-CP-26-5264 & 4:12-cv-02216**

8/9/2012 MTD (exhibit # 88 & exhibit # 49 entry # 9) and  
Memorandum at exhibit # 49 entry # 9-3) Pages 391-422<sup>6</sup>

#### **Lawsuit # 4 – 2013-CP-26-2528 & 4:14-cv-04352**

9/5/2013 MTD<sup>7</sup> (exhibit # 89) Pages 423-428

6/2[5]<sup>8</sup>/2014 2<sup>nd</sup> MTD the FAC<sup>9</sup> (exhibit # 90) Pages 429-432

### **4. Affidavits of Default, Response, Entry of Default, Motion for Default Judgment (MFDJ, etc) and Notice, etc**

7/15/2014 Affidavits of Default (14) Pages 433-474

7/15/2014 Affidavits of Default and Response to Plaintiff's motion to  
dismiss the first amended counterclaims Pages 475-492

9/30/2014 Entry of Default (40) Pages 493-532

9/30/2014 Motion for Default Judgment (MFDJ, etc) Pages 533-538

7/15/2014 Cert of Service; 9/30/2014 Cert of Service; 9/30/2014  
Receipt for MFDJ, etc; and 9/30/2014 Notice of Hearing  
Pages 539-546

<sup>5</sup> Under Rule 12(b)(2) and 12(b)(5) FRCP.

<sup>6</sup> HC Public Index - see Pages 1933-1935; and  
Notice of Withdrawal - see Pages 1936-1938.

<sup>7</sup> No Memorandum was filed with the MTD.

<sup>8</sup> In several documents in the Record - Hunt has mistakenly referred to this document with a file date of  
6/23/2014. The correct file date is 6/25/2014.

<sup>9</sup> No Memorandum was filed with the MTD.

## **5. Transcripts**

9/21/2011 Transcript (exhibit # 64)	Pages 547-556
5/20/2014 Transcript	Pages 557-828
10/14/2014 Transcript (exhibit # 107)	Pages 829-958
11/10/2015 Transcript	Pages 959-1072

## **6. Other Motions**

10/30/2014 Motion to Alter or Amend [] (MTAOA)	Pages 1073-1086
5/27/2015 Motion under SCRCP 41	Pages 1087-1094
8/11/2015 Motion: Lack of Jurisdiction, Rule 59 and 60, SCRCP (re 1/13/2015 Order)	Pages 1095-1100
8/11/2015 Motion: Lack of Jurisdiction, Rule 59 and 60, SCRCP (re 6/03/2015 Order)	Pages 1101-1106

## **7. Notice of Removals (NOR)**

8/6/2012 NOR	Pages 1107-1109
11/10/2014 NOR (exhibit # 80)	Pages 1110-1118

## **8. Briefs**

05/20/2014 Brief (filed on 10/16/2014 by the Court)	Pages 1119-1178
10/14/2014 Brief (filed on 10/16/2014 by the Court)	Pages 1179-1224
11/10/2015 Brief (filed on 11/10/2015 by Hunt)	Pages 1225-1270

## **9. Exhibits No.**

1	IRS Form 1098	Pages 1271-1274
2	Articles of merger for BBT and CFB	Pages 1275-1278
3	Affidavit of CB Hunt (CBH)	Pages 1279-1288
4	POD signature card	Pages 1289-1292

5	Setoff \$225.25 against POD Account	Pages 1293-1296
6	Affidavit of Davis	Pages 1297-1372
7	CBH 5/2007 Loan Application	Pages 1373-1380
8	Butcher Loan Officer's Information	Pages 1381-1383
9	CD (10/2006 -5/2007)	Pages 1384-1387
10	Customer Profile (7/19/2007)	Pages 1388-1395
11	Merger documents	Pages 1396-1406
12	Affidavit of Davis	Pages 1407-1410
13	Letter from Craven to CBH	Pages 1411-1415
14	Letter from CBH to FDIC	Pages 1416-1419
15	Letter from TEAL TO FDIC	Pages 1420-1423
16	Setoff \$855.00 against POD Account	Pages 1424-1429
17	Letter from FDIC TO HUNT 5/8	Pages 1430-1432
18	Letter from FDIC TO BBT 5/8	Pages 1433-1436
19	Letter from BOOZ TO FDIC	Pages 1437-1440
20	Letter from CBH TO FDIC 6/6	Pages 1441-1447
21	Letter from TEAL TO FDIC 6/27	Pages 1448-1452
22	Letter from FDIC TO BBT 6/12	Pages 1453-1455
23	Blank – see exhibit # 44	
24	Blank – see exhibit # 45	
25	letter FDIC TO HUNT 8/7	Pages 1458-1462
26	2/10/2011 Affidavit of CB Hunt (CBH)	Pages 1463-1468
27	3/17/2008 from CBH & 9/9/2008 from Okay	Pages 1469-1476
28	9/24/2010 letter of dispute from CBH to BBT	Pages 1477-1482
29	9/27/2010 from BBT to Hunt	Pages 1483-1485

30	HCPD Crime Report	Pages 1486-1490
31	Search Warrant	Pages 1491-1495
32	Return of Search Warrant	Pages 1496-1499
33	BBT Identity Theft	Pages 1500-1507
34	3/28/2008 & 6/12/2008 FDIC to BBT	Pages 1508-1511
35	9/2/2008 from FDIC to CBH	Pages 1512-1514
36	5/19/2008 closure of IOLTA & POD	Pages 1515-1518
37	June 4, 2012 letter to BBT Mortgage	Pages 1519-1526
38	SAC: Doc. # 38 of 4:09-2151— see pages 155-164	
39	Order: Doc. # 124 of 4:09-2151—see pages 17-19	
40	USCA Orders:	
	May 16, 2012 —	see pages 20-27
	Reconsideration	None
	June 26, 2012 —	see pages 28
41	Order: Doc. # 110 of 4:09-2151— see pages 1-16	
42	3/13/2012 financial statement of BBT	Pages 1527-1530
43	<b>Order: Doc. #s 30-31 of 4:12-2216</b> see Pages 50-58	
44	BSA #1 (old exhibit # 23)	Pages 1531-1559
45	BSA #2 (old exhibit # 24)	Pages 1560-1576
46	<b>Affidavit of CB Hunt</b>	Pages 1577-1586
47	Civil Docket for Case # 4:09-cv-02151 <sup>10</sup>	Pages 1587-1600
	entry # 36 (unauthenticated document)	Pages 1601-1604
	entry # 38 SAC: see exhibit # 38	Pages 155-164
	entry # 41 See exhibit # 49 entry # 16-2 (MTD) & see exhibit # 49 entry # 16 (Memo)	Pages 391-422

<sup>10</sup> Lawsuit # 1.

	entry # 96-1 (affidavit of Teal)	None
	entry # 97 (FN 1) see exhibit # 51	see Pages 1781
	entry # 105 motion to amend	Pages 1605-1620
	entry # 105-1 proposed TAC	Pages 1621-1660
	entry # 108 Response	Pages 1661-1672
	entry # 110 Decline Supplemental see exhibit # 41	Pages 1-16
	entry # 114 Reply	None
	entry # 124 Denial see exhibit # 39	Pages 17-19
	entry # 137-138 Affirmed see exhibit # 40	Pages 20-28
	USCA entry # 9 Jurisdictional Statement	None
48	Civil Docket for Case # 4:11-cv-00870 <sup>11</sup>	Pages 1673-1678
	entry # 9 FAC see exh # 49 entry # 15-8	see Pages 165-232
	entry # 34 MTD	see Pages 381-390
	entry # 63-64 Order see exhibit # 52	see Pages 29-44
49	Civil Docket for Case # 4:12-cv-02216 <sup>12</sup>	Pages 1679-1682
	entry # 1 Complaint & Index	see Pages 233-260
	entry # 9 MTD	see Pages 391-397
	entry # 9-1 HC Public Index	Pages 1933-1935
	entry # 9-2 Notice of Withdrawal	Pages 1936-1938
	entry # 9-3 Memorandum	see Pages 398-422
	entry # 14 Response to MTD	None
	entry # 14-1 (NOR)	see Pages 1110-1118
	entry # 14-2 Mortgage Late Notice	Pages 1683-1684
	entry # 14-3 (2003 title to 195 D)	Pages 1685-1689

<sup>11</sup> Lawsuit # 2.

<sup>12</sup> Lawsuit # 3 – See 1107-1109 Notice of Removal.

	entry # 14-4 (2007 CBH Mortgage)	Pages 1690-1704
	entry # 14-5 (2007 CBH Settlement)	Pages 1705-1707
	entry # 14-6 (2003 CBH Mortgage)	Pages 1708-1726
	entry # 15 (2003 CBH settlement on WGD)	Pages 1727-1731
	entry # 15-1 (2002 CBH vehicle title)	Pages 1732-1733
	entry # 15-2 (1993 CBH mortgage on Cultra)	Pages 1734-1741
	entry # 15-3 (2004 Davis mortgage WGD)	Pages 1742-1758
	entry # 15-4 (2002 Sherman mortgage)	Pages 1759-1771
	entry # 15-5 (2002 Allen car lien)	Pages 1772-1773
	entry # 15-6 (2002 Allen car note)	Pages 1774-1775
	entry # 15-7 (Nat'l Mort Licensing Sys)	Pages 1776-1778
	entry # 15-8 (lawsuit # 2 complaint)	see Pages 165-232
	entry # 16 (MTD #20 of 4:09-2151)	see Pages 339-354
	entry # 16-1 (affidavit of BOOZ)	None
	entry # 16-2 (MTD #41 of 4:09-2151)	see Pages 355-380
	entry # 16-3 (affidavit of Licata)	None
	entry # 16-4 (lawsuit # 1 Order)	see Pages 1-28
	entry # 16-5 (Craven's Address)	None
	entry # 22 see exhibit # 61 (RR)	see Pages 45-49
	entry #s 30-31 see exhibit # 43 (Order)	see Pages 50-58
50	Doc. # 96-1 of 4:09-2151 Affidavit of Teal	None
51	Doc. # 97 of 4:09-2151 (loans paid off at FN #1)	Pages 1779-1786
52	Order: Doc. #s 63-64 of 4:11-00870	see Pages 29-44
53	Email: June 17, 2013 Judge Culbertson	Pages 1787-1790

54	Michele Loftis: listed as notary at SC Secretary of State	None
55	Affidavit for Order of Publication	Pages 1791-1794
56	Order of Publication	Pages 1795-1798
57	Index of exhibits -	None
58	Email: Payment History	Pages 1799-1802
59	Emails between BIC & attorney for WGHOA	Pages 1803-1808
60	Motion to Strike Answer & Answer of WGHOA	Pages 1809-1816
61	RR of lawsuit # 3	see Pages 45-49
62	Complaint & index	see Pages 233-260
63	Letter to FDIC/OIG	Pages 1817-1820
64	9/21/2011 Transcript (60 day stay pgs 27-29)—see	Pages 547-556
65	USPTO 2013 Certificate	Pages 1821-1824
66	List of IOLTA financial partners	Pages 1939-1942
67	Blank	
68	CJ Developers, LLC - Dissolved	Pages 1825-1828
69	Withdrawal of the Answer of WGHOA	Pages 1829-1834
70	5/19/2014 Affidavit of Hunt	Pages 1835-1838
71	Blank	
72	8/03/2013 Proof of Service re Answer, counterclaims/defenses and summary judgment	None
73	9/05/2013 MTD	see Pages 423-428
74 - 79	Blank	

80	11/10/2014 <b>Notice of Removal</b>	see Pages 1110-1118
81	12/08/2014 BBT's Motion to Remand	Pages 1839-1846
82	12/22/2014 Hunt's Response to Remand	Pages 1847-1870
83	01/03/2015 BBT's Reply (13, 13-1, 13-2)	Pages 1871-1880
84	01/13/2015 Order filed in State Court <sup>13</sup>	see Pages 98-112
85	04/15/2015 RR	see Pages 113-121
86	05/08/2015 Order of Remand	see Pages 122-129
87	05/11/2015 <b>Order of Remand</b>	see Pages 130-135
88	8/09/2012 MTD of lawsuit # 3	see Pages 391-422
89	9/05/2013 MTD of lawsuit # 4	see Pages 423-428
90	6/25/2014 MTD of lawsuit # 4	see Pages 429-432
91	Documents served on 10/30/2014	None
92	Hunt's Santee Cooper Power Service	Pages 1881-1884
93	SC SOS: RA for WGHOA	None
94	Order filed 10/28/2014 (from BBT)	see Pages 85-90
95	8/27/2015 Email to BBT	Pages 1885-1886
96	Documents served on 8/11/2015	None
97	7/27/2015 Letter to the HC Clerk of Court	Pages 1887-1891
98	Order filed 6/3/2015	see Pages 136-138
99	9/11/2013 Notice [of Motion Scheduling]	Pages 1892-1894
100	Affidavit of Hunt	Pages 1895-1898
101	11/25/2014 Order re address	see Pages 91-97
102	Blank	
103	Blank	

---

<sup>13</sup> Hunt received this document from the HC Clerk of Court on 8/10/2015. See exhibit # 97.

104 6/20/2013 Affidavit of non service Pages 1899-1900

105 7/15/2014 Cert of Service; 9/30/2014 Cert of Service;  
9/30/2014 Receipt for MFDJ, etc; and 9/30/2014 Notice of Hearing  
See Pages 539-546

106 11/2/2015 Amended Notice of Hearing; 11/2/2015 Cert of  
Service; 11/2/2015 USPS Cert Return Receipt None

107 10/14/2014 Transcript of hearing see Pages 829-958

**10. Email:** 10/15/2014 between Foerster, Hunt & Miller  
Page 1901-1902

**Email:** 10/23/2014 from Judge Howe Pages 1903

**Email:** 10/28/2014 at 9:38 pm from S Foerster Pages 1904-1905

**Email:** 06/17/2016 at 1:17 pm from CB Hunt Pages 1906-1928

**Email:** 02/26/2016 at 1:26 pm from CB Hunt Pages 1929-1932

**11. The below ECFs are used in Hunt's response to BBT's motion to remand. See exhibit # 82.**

ECF 11-1 see WGHOA affidavit of service at exhibit # 81.

ECF 11-2 see CJ Developers affidavit of service at exhibit # 81.

ECF 14-2 - see Mortgage Late Notice exhibit # 49 entry # 14-2

ECF 22 - see exhibit # 61

ECF 29 - see exhibit # 46

ECF 30-31 - see exhibit # 43

ECF 64 - see exhibit # 52

ECF 97 - see exhibit # 51

ECF 108 - - see exhibit # 47 entry # 108

## **12. ACRONYMS**

AFCB – Attorney Fees and Costs to BBT

AFCH – Attorney Fees and Costs to Hunt

BBT – Branch Banking & Trust

BSA – Banking Service Agreement

BOFD – Breach of Fiduciary Duty

CC – Counterclaims

CD – Certificate of Deposit

CFB – Coastal Federal Bank

CRA – Credit Reporting Agency

FAC – First Amended Complaint / Counterclaims

FDIC – Federal Deposit Insurance Corporation

HC – Horry County

HCPD – Horry County Police Department

IOLTA – Interest on Lawyers Trust Account

MFAFC – Motion for Attorney Fees and Costs

MFDJ – Motion for Default Judgment

MTAOA – Motion to Alter or Amend

MTD – Motion to Dismiss

MTR – Motion to Remand

NOR – Notice of Removal

PD – Punitive Damages

POD – Payable on Death account

RR – Report and Recommendation of the Magistrate of the USDC

SAC – Second Amended Complaint

SCPC - South Carolina Probate Court  
SCSC - South Carolina Supreme Court  
SC SOS - South Carolina Secretary of State  
SOL - Statute of Limitation  
TAC - Third Amended Complaint  
UFTPA - Unfair Trade Practice Act  
USCA - United States Court of Appeals  
USPS - United States Postal Service  
USDC - United States District Court  
USPTO - United States Patent and Trademark Office  
WGHOA - Willow Green Homeowners Association

**Certification:** I hereby certify that the Record on Appeal contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

*C B Hunt*

Cindy B Hunt (SC Bar # 65408)

*March 19, 2025*

Date: ~~July 08, 2017~~

Pro Se

195 D Willow Green Drive

Conway, SC 29526

(843) 488-1131/(843) 347-7230

PRESS FIRMLY TO SEAL



PRESS FIRMLY TO SEAL

PRIORITY MAIL  
FLAT RATE ENVELOPE  
POSTAGE REQUIRED

UNITED STATES  
POSTAL SERVICE

Retail

**P**

US POSTAGE PAID

**\$10.10**

Origin: 29579  
03/20/25  
4561640579-5

**PRIORITY MAIL**

FROM:

Ms. Cindy B. Hunt  
195 Willow Green Dr Unit D  
Conway, SC 29526

- Expect
- Domes
- USPS
- Limited
- When l

**PRIORITY MAIL®**

0 Lb 8.70 Oz  
**RDC 03**

apply).  
International destinations.

EXPECTED DELIVERY DAY: 03/22/25

quired.

- \*Insurance i
- Domestic M
- \*\* See Inter

**B012**

ns see th

SHIP

TO:

PO BOX 11629  
COLUMBIA SC 29211-1629

ations of coverage.



Schedule free Package Pickup,  
scan the QR code.

USPS TRACKING® #



9505 5109 9891 5079 5959 19



USPS.COM/PICKUP

TO:  
Ms. Jenny Kitchens  
Ms. Mary Caitlyn Singleton  
SCC A  
PO Box 11629  
Columbia, SC  
29211

FLAT  
ONE RATE

TRACKING



OD: 12 1/2 x 9 1/2



The packaging is the property of the U.S. Postal Service and is provided solely for use in sending Priority Mail® and international shipments. Mailpiece may be a violation of federal law. This package is not for resale. EFTAF © U.S. Postal Service, October 2021. All rights reserved.

This package is made from post-consumer waste. Please recycle.