

**RECEIVED**

**Mar 24 2025**

**SC Court of Appeals**

The State Of South Carolina

In The Court Of Appeals

Appeal From Horry County

Court of Common Pleas

B. Alex Hyman, Circuit Court Judge

Appellant Case No. 2025-000343

Case No. 2025-CP-26-00230

Answer to Respondent Motion to Dismiss Appeal

I Djuan Holland the Appellant is responding to the Respondent Motion to Dismiss my Appeal. This Court granted me a Stay of Eviction based upon the evidence that I provide. Not once have I abused or had any intentions to abuse or waste the court time or mine time in filing appeals. The law is set up and written for people to file appeals if they feel that something isn't right in the court system, workplace etc. I didn't write the South Carolina Law for appeals. I filed Motion to Reinstate when I had called the Circuit Court to see if my case had been scheduled because I needed to provide the Appeal Court a copy of it. The Appeal court dismissed my case because I didn't have an Order from the Circuit Court which didn't allow the Appeal Court to have Jurisdiction over my case. I then filed a Motion to Stay Eviction once I received the order from the Circuit Court which now allows the Appeal Court Jurisdiction over my case which at that time, they Granted me a Temporary Stay. I didn't fail to provide the Appeal Court a disposing order from the Court of Common Pleas because I didn't have one at that time to provide I sent over what the Court of Common Pleas provide me and that was a copy of the court hearing which I emailed to the Appeal Court but that wasn't what they needed at that time so the case was dismissed for that reason. I would like to know where I was complaining of what appears to be a misunderstanding of the legal process, I am requesting that the Respondent provide me those exact words in any of my Appeal Filings. If there is any abuse going on it's the Respondent lying to the Court to gain a win. I haven't violated anyone rights as the

Respondent have stated, when the court sends me back deficiency letters for me to make corrections in my filings that's what I do I make the corrections. I think it's unprofessional and unacceptable to basically be called a liar saying that I didn't send Moorland Reserve a copy of my Motion which is disrespectful when I mailed all copies and also Emailed Ms. Jen Dixon the Property Manager of Moorland Reserve on Feb 28, 2025 and also emailed her a copy of Order of Stay. Once I put something in the mail system it's out of my hands, the court didn't require me to send anything Certified. See Attachment of email sent. I didn't have to mention anything about my Appeal because the Circuit Court already had the Order from the Appeal Court that's why a hearing scheduled. The Circuit Court never held any duplicate hearings because the first hearing never took place because it was dismissed. I'm not creating a backlog as I'm being accused of doing the court is already backlogged. If this level of disrespect and constant lying on me from Respondent, I will be contacting the Bar Association and filing a formal complaint against Morgan R. Dunn the Respondent. I've also did some google reviews about this Law Firm and the rating are bad, see attachment. Also, I have addressed with the Magistrate, Moorland office on site about the different amounts that keep showing up also and when I had my hearing on March 10, 2025, that the Resident Portal has different amounts see attachments. When I had my hearing on Jan 11, 2025 in Magistrate Court the Bond was set for 15, 942.75 even though that wasn't the amount that the initial filing was filed for in Nov 2024, Feb 19, 2025 the amount was quoted for 19, 424.25 on my appeal that when back in front of Judge Arakas, so when you subtract 19, 424.25 from 15, 942.75 you get 3481.50 over the rent is 2665.00 plus 100.00 for utility pack plus 266.00 late fees that comes up to 3031.00 where is the extra 450.00 coming from. Now same thing again when had Bond hearing in Court of Common Pleas bond was set on March 10, 2025, in the amount of 22, 905.75 now subtract 22, 905.75 from 19, 424.25 from Feb 2025, it comes out to the same where is the extra 450.00 coming from. On March 16, 2025 I checked the Resident Portal two amounts came up at different times of the day which I did call Abby about it she was working in the office that day she didn't know why it was doing that the first amount was 9879.75, then the later it was 16, 412.75. See attachment. In the Appeal Court Order in was ordered for me to sign an Undertaking Order which didn't happened never bought up only a Bond set for 22, 905.75, where is my right to have given to me that a Higher Court has put in an Order to be done. See attach Order from Circuit Court it's not an Undertaking form at all. See Attachments. In conclusion I the Appellant with all due respect is asking the Court of Appeals to DENY the Respondent Motion to Dismiss my appeal until I get the true amount of what is owed broken down as you can clearly see from dates and times that there is a calculation issue. And I am also requesting that Morgan R. Dunn be removed from this case as surely, she's not a good Representative for this company, I will let the Bar Association handle her after I make my formal complaint again her.

Thank You for Your Time

/s/ Djuan Holland

139A Moorland Reserve Pl

Myrtle Beach, Sc 29579

843-385-8098