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Mar 24 2025

SC Court of Appeals

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

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

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

Palmetto Citizens Federal Credit Union,

RESPONDENT,

versus

Keiven Keon Minter,

APPELLANT.

**RESPONDENT’S RETURN TO APPELLANT’S NOTICE OF NON-
PARTICIPATION AND WITHDRAWAL-SECURED PARTY STANDING**

Palmetto Citizens Federal Credit Union, Respondent in the above referenced matter, hereby files this Return and objects the relief sought in Appellant Keiven Keon Minter’s document entitled “Judicial Notice of Non-Participation & Withdrawal-Secured Party Standing.”

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 Minter’s motion for summary judgment. The judgment was entered against

Keiven Keon Minter. Appellant Minter 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 Minter 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 Minter’s motion raises issues beyond that considered by Judge Coble and those raised by Appellant Minter in his Initial Appellant’s Brief. Appellant Minter, via his latest filing, attempts to unilaterally change the name of the party against whom the judgment was entered. Appellant Minter never raised before Judge Coble any issues with the name of the defendant and did not raise this issue in his Initial Appellant’s Brief. There is no basis for this Court to consider and grant any relief sought in Appellant Minter’s motion. Accordingly, Respondent requests this Court to deny the relief sought in Appellant Minter’s Judicial Notice of Non-Participation & Withdrawal-Secured Party Standing.

[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)

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

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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 Judicial Notice of Non-Participation & Withdrawal-Secured Party Standing dated March 24, 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

136 Sandpine Circle
Columbia, SC 29229
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
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**ATTORNEYS FOR RESPONDENT
PALMETTO CITIZENS FEDERAL
CREDIT UNION**


Dated: March 24, 2025.

From: [Carmen Ganjehsani](#)
To: kminter85@hotmail.com
Cc: [Nelson Weston](#); [Katie Engels](#)
Subject: 2024-001529 Palmetto Citizens v. Minter
Date: Monday, March 24, 2025 12:23:00 PM
Attachments: [2024-001529 Palmetto Citizens v. Minter \(Return to Judicial Notice of Non-Participation and Withdrawal - Secured Party Standing\) \(3681640\).pdf](#)

Mr. Minter,

Please find served upon you Respondent Palmetto Citizens Federal Credit Union's Return to your Judicial Notice of Non-Participation and Withdrawal-Secured Party Standing. We will also be serving a copy of this Return via U.S. Mail at your address on file with the Court of Appeals.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
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