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Mar 27 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

Djuan Holland

Appellant

Vs

Moorland BRT LLC d/b/a

Moorland Reserve,

Respondent

Answer To Respondent Motion to Dismiss

Respondent claims that I didn't provide any info about disputing amounts, when I clearly sent her proof of service with the info of screenshots with dates and times of how the amounts keeps changing, I also sent copies to Appeal Courts see attachments, here we go with more lies from Morgan R Dunn. Lying is a violation for a Lawyer, as for the American Bar Association (ABA) Model Rules of Professional Conduct PROHIBIT attorneys from knowingly making false statements of material fact of law which can lead to disciplinary action including DISBARMENT. I have filed a complaint with the (ABA) against Morgan R Dunn. I would like for Morgan R Dunn to prove that I'm doing my appeals based on North

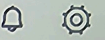
Carolina law, which by far not the truth , I would like for Morgan R Dunn to prove this, as she is licensed in North Carolina and South Carolina so it appears that she's getting the states missed up, why would I want to do anything based on another state when I don't live there and have never lived in North Carolina. Morgan R Dunn clearly isn't a good Representation for Moorland Reserve. Judge Hyman set Bond not an undertaking order in which a due date for current rent and a reasonable amount to pay on the back rent, If the back rent could've been paid in full then there wouldn't be any need for any court hearings. When a good Judge put an order in place to help people to get caught up on their rent payments and not become homeless during and appeal, then you have another Judge comes along and undo what a decent Judge put into place. In this day and time nobody job is guaranteed, and nobody is exempt from being homeless with the way the economy is now days. I know a lot of people would've just filed bankruptcy and been done with it and nobody would get anything, I'm not trying to do that I want to pay and have a place to live, I'm 60yrs old and has always paid my rent. This situation has been very stressful for me I'm in this situation because of a past employer.

/S/ Djuan Holland 843-385-8098

139A Moorland Reserve Pl

Myrtle Beach, SC 29579

Home



Amount Due

\$9,879.75 ⓘ

Pay Now

Automatic Payments: **Off** ●

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To view our resident services go to www.lincolnaps.com/residents. The notes field in your payment screen is only for your records. This is not a proper way to communicate with your leasing office for any resident related issues. Notice to vacate, maintenance requests and/or payment issues will not be seen by the community; therefore no response will be given. **If you enter a wrong routing number or account number your payment will be returned NSF from the bank and you will be responsible. CORT Furniture - Lincoln Residents get a discount. Go to this link - <https://www.cort.com/lincoln>

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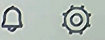


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Unit139A

Change My Lease

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Lease Options

Contact Property

Amount Due
\$12,644.75 ⓘ

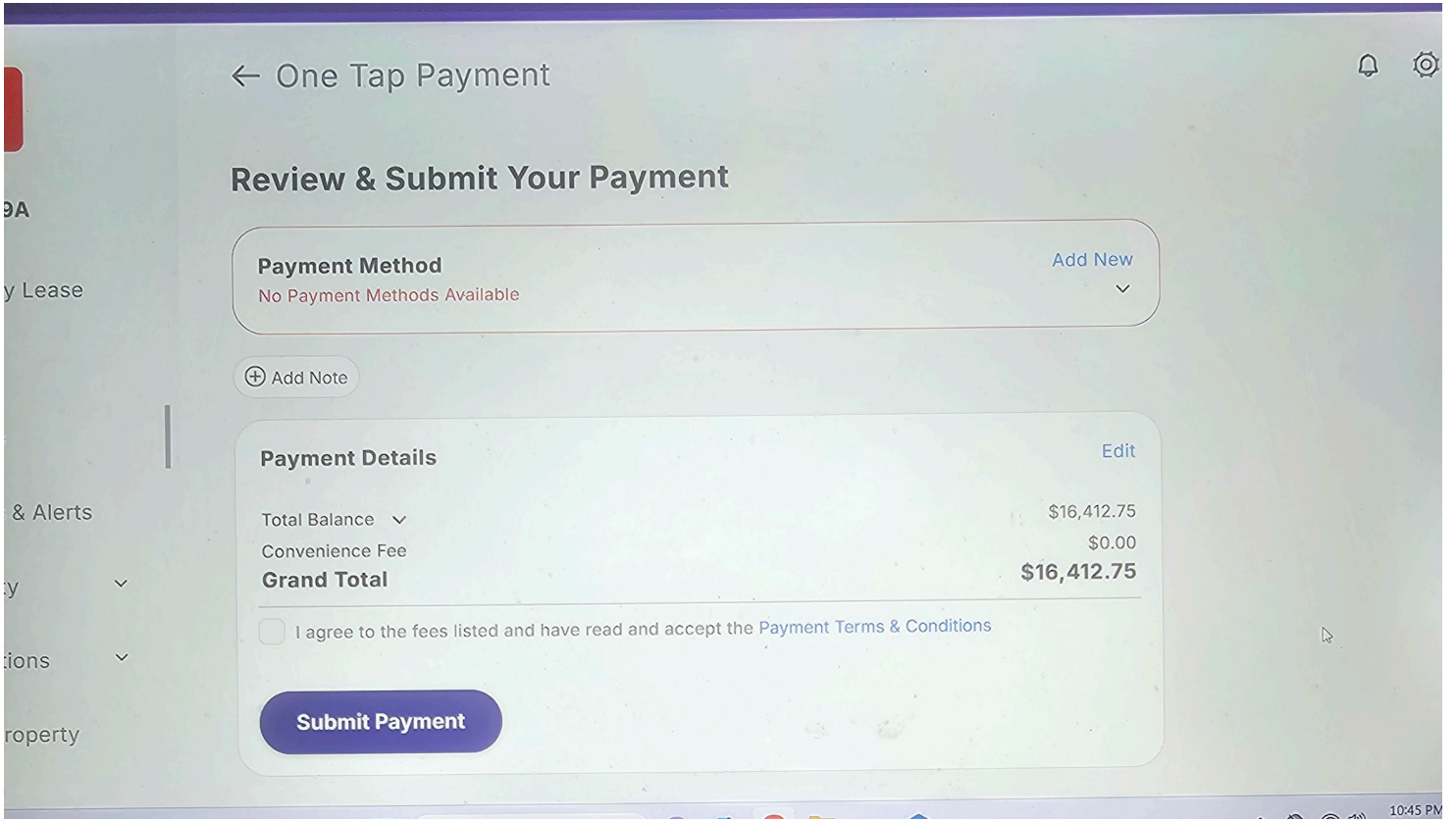
Pay Now.

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Jan 11

Balance Details

pestfee	\$5.00
rent	\$2,665.00
cablechg	\$35.00
cablechg	\$35.00
pestfee	\$5.00
rent	\$2,665.00
cablechg	\$35.00
rent	\$2,665.00
pestfee	\$5.00
cablechg	\$35.00
rent	\$1,303.25
Total	\$15,942.75

[Close](#)

moorlandreserve.residentportal.com/app/home

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Unit139A

Amount Due **\$4,008.25**

Automatic Payments: **Off**

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To view our resident services go to www.lincolnaps.com only for your records. This is not a proper way to contact us for related issues. Notice to vacate, maintenance requests, etc. are posted in the community; therefore no response will be given. **If you do not make your payment will be returned NSF from the bank and you will be responsible for the fee.

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Unit139A

Change My Lease

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lease Options

Contact Property

← One Tap Payment

Review & Submit Your Payment

Payment Method Add New

VISA5537

+ Add Note

Payment Details Edit

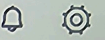
Total Balance	\$9,879.75
Convenience Fee	\$7.95
Grand Total	\$9,887.70

I agree to the fees listed and have read and accept the [Payment Terms & Conditions](#)

Submit Payment

7:32 PM 3/16/2025

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Amount Due

\$9,879.75 ⓘ

Pay Now

Automatic Payments: **Off** ●

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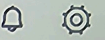


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Amount Due

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Your Payment

Add New



Edit

\$19,424.25

\$0.00

\$19,424.25

and have read and accept the [Payment Terms & Conditions](#)



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Amount Due


\$6,783.25 ⓘ


Automatic Payments: **Off** ●

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Appellant

Vs

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Moorland Reserve

CERTIFICATE OF SERVICE

I certify that I have served the Respondent's my answer on Emergency Hearing of stay by depositing a copy of it in the United States Mail, postage pre paid on March 28, 2025 addressed to Morgan R Dunn , Brownlee Whitlow & Praet, PLLC POB 62975 North Charleston, SC 29419.

/s/ Djuan Holland 843-385-8098

139A Moorland Reserve Pl

Myrtle Beach, SC 29579