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**Apr 09 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Alan D. Clemmons, Master in Equity

Appellate Case No. 2024-001119

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Specialized Loan Servicing LLC,

Respondent,

v.

Cindy B. Hunt,

Defendants,

Of whom, Cindy B. Hunt is the Appellant.

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REPLY TO APPELLANT'S RETURN TO RESPONDENT'S RENEWED MOTION TO  
DISMISS

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(803) 454-3540  
*Attorney for Respondent*

**NOW COMES** Respondent, Specialized Loan Servicing LLC. (“Specialized Loan Servicing”), by and through its undersigned attorney, and pursuant to Rule 240(f) of the South Carolina Appellate Court Rules, hereby submits its reply to Appellant’s return to Respondent’s renewed motion to dismiss, averring as follows:

**BRIEF PROCEDURAL HISTORY**

This matter is an action to foreclose a mortgage on real property in Horry County, South Carolina. Appellant challenges the Master in Equity’s Order and Judgment of Foreclosure and Sale in favor of Respondent entered on June 26, 2024. Following this Court striking her previous initial brief and designation of matter, Appellant submitted documents purporting to be her amended initial brief and designation of matter on March 21, 2025. On March 25, 2025, Respondent filed a renewed motion to dismiss the appeal based upon Appellant’s amended initial brief and designation of matter, similar to her original filings, being so deficient as to make it impossible for Respondent to issue its initial brief and designation of matter. Appellant submitted a return to Respondent’s renewed motion to dismiss her appeal on April 3, 2025. Appellant’s return is confusing and does not address the egregious deficiencies contained in her amended initial brief and designation of matter which form the grounds for Respondent’s renewed motion to dismiss. Accordingly, Respondent’s motion to dismiss should be granted.

**ARGUMENT AND CITATION OF AUTHORITY**

Appellant’s return, much like her original and amended initial briefs, can best be described as a meandering and confusing stream of conscious monologue. Appellant makes arguments, such

as those related to related to SCACR Rules 221(a) and 260, which have no applicability to the motion before the Court.

Appellant's reference to SCACR Rule 221(a) is confusing because Respondent's motion is not a motion for rehearing following a dispositive opinion, order, or judgment of the Court. Appellant's assertion that Respondent has not stated with particularity the points supposed to have been overlooked or misapprehended by the court is misplaced because the Rule is not applicable to Respondent's motion.

Regarding SCACR Rule 260, while the clerk could have issued an order involuntarily dismissing the appeal based upon Appellant's failure to comply with the Rules, nothing in SCACR Rule 260(a) prohibits a party from filing a formal motion to request that this Court dismiss the appeal. Respondent's request for dismissal is appropriately based upon Appellant's amended initial brief and designation of matter being so deficient as to make it impossible for Respondent to issue its initial brief and designation of matter.

To the extent Appellant argues that the facts relied upon in support of Respondent's motion to dismiss were not included in attachments to Respondent's motion, Appellant continues to ignore that the documents relied upon in support of Respondent's motion to dismiss are her deficient amended initial brief and designation of matter. Appellant was given ample opportunity to correct her deficient initial brief and designation of matter after her previous versions were stricken. She chose not to do so, resulting in Respondent filing its renewed motion to dismiss the appeal. Appellant's reply does not address the deficiencies pointed out by Respondent or make any arguments as to why the appeal should proceed. Rather, Appellant's reply confusingly asserts inapplicable Rules as a defense to Respondent's motion. Therefore, Respondent's renewed motion to dismiss the appeal should be granted.

**CONCLUSION**

For the reasons set forth in Respondent's renewed motion to dismiss, and because Appellant has failed to address the egregious deficiencies in her amended initial brief and designation of matter, Respondent respectfully requests that this appeal be dismissed and requests such other relief this Court deems just and proper.

Respectfully submitted,

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*Attorney for Respondent Specialized Loan  
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Dated: April 9, 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 9, 2025, she served a copy of Respondent's Reply to Appellant's Return to Respondent's Renewed Motion to Dismiss, and Certificate of Service by Mail upon the person below by depositing the same in the U.S. Mail with proper postage affixed and addressed as follows:

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



Lauren Browder  
BROCK & SCOTT, PLLC