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OCT 14 2013

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLETON COUNTY

Court of Common Plea (Master-in-Equity pursuant to 203(b)(4) and 14-11-85 S.C. codes of law

Mikell R. Scarborough

Case no. 2012-CP-10-4981

Reverse Mortgage Solutions,
Inc.....Respondent

v.

Elvenia Bowens, and United States of America, acting by and through
Its Agency, Secretary of Housing and Urban Development (HUD)
.....Appellants

EXPARTE MOTION FOR JOINDER OF NECESSARY PARTIES

Appellate case # 2013-00-2122

Wherefore, on or about February 12, 2013, May 7, 2013 and August 7, 2013 Marvin Bowens, being a non-lawyer represented his mother, Elvenia Bowens before the Master-in-Equity (Circuit Court). And Wherefore, Marvin Bowens lost the case before the "Master". And wherefore, Marvin Bowens is the sole heir to the property involved in the case before the "Master". Marvin Bowens is now an aggrieved party. As such, he moves this Honorable Court pursuant to SC Codes of law 18-1-30 (Law Co-op 1976); Rule 201(b) and 203(b), S.C.A.C.R grant this motion and offers the following as good and sufficient grounds to do so:

FIRST GROUND FOR MOTION: Repeated unlawful representation/personal injury

Although contrary to law, Marvin Bowens, a non-lawyer represented his mother before the Master-in-Equity on or about February 12, 2013, May 7, 2013 and August 7, 2013. At the August 7, 2013 Marvin Bowens attempted to withdraw because the case was getting complicated because the "Master" allowed a third attorney (different from the two prior attorneys) from the same law firm to re-open the case and litigate estoppels issues (issues waived by the two prior attorneys being unlawful property charges re-imburements. This representation was to the detriment of both Elvenia and Marvin Bowens. Marvin Bowens only spoke to the attorneys because at the first hearing his mother was sick and the second hearing was only to provide the

attorney with documentation. However, the attorneys required him to appear before the "Master".

SECOND GROUND FOR MOTION: property injury

Marvin Bowens is the sole heir to the home foreclosed in this case, so he will lose his inheritance.

THIRD GROUND FOR MOTION: aggrieved by relevant case law and rule

Due to the fact that Marvin Lamar Bowens was forced to represent his mother, Elvenia, after requesting to withdraw as well as the fact that he represented her to their detriment he is now an "Aggrieved party" Pursuant to SC Codes of law 18-1-30 (Law Co-op 1976); Rule 201(b) and 203(b), S.C.A.C.R. and case laws Spanish Wells Property Owners ass'n v. Board of Adjustment, 295 S.C. 67, 367 S.E.2d 160 (1988) Asbury v. South Carolina Nat'l Bank, 268 S.C. 40, 231 S.E. 2d 306 (1977); Cobb v. South Carolina Nat'l Bank, 210 S.C. 533, 43 S.E. 2d 465 (1947); Reed v. Lemacks, 204 S.C. 26, 28 S.E. 2d 441 (1943); In re Estate of Mayo, 60 S.C. 401, 38 S.E. 634 (1901); Witte Bros. V. Clarke, 17 S.C. 313 (1882); Bivens v. knight 254SC10, 173 SE 2d 150 (1970); Cisson v. McWhorter 255 SC 174, 177 SE 2d 603 (1970); Parker v. Brown 195 SC 35, 10 SE 2d 625 (1940)

Reliefs,

- 1). Granting this motion adding Marvin Lamar Bowens as a necessary party to this appeal with all rights and privileges therein until such time as the Respondent can be served this Exparte motion and a hearing can be held, if necessary. This would allow Marvin Bowens the right to continue Pro Se with this appeal indefinitely or until such time as the appellants can obtain counsel in this matter.
- 2). Any other just relief

October 14, 2013

Other Counsel of record
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(Without objections)



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