

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION, LANDLORD AND TENANT BRANCH BLDG. B, 510 4th Street N.W.,
Room 110, Washington, D.C. 20001 Telephone: (202) 879-4879

Landlord/Plaintiff Genevieve Farmer, Jacqueline King, Ruth Richburg

LTB **RECEIVED**

Vs

Tenant/Defendant LaSheila Mitchum Green

Court of Common Plea JUN 16 2025

APPLICATION TO STAY EXECUTION OF WRIT OF RESTITUTION SC Court of Appeals

On (date) on or before June 19, 2025, a Writ of Restitution was issued for possession of the property located at 208 Madison Avenue, Kingstree, SC 29556. The first date an eviction may take place is June 19, 2025 and the last date under this Writ is on or before June 19, 2025. The eviction is set for on or before June 19, 2025, at 12:00 a.m.

State briefly the reasons why the Court should stay execution of the Writ of Restitution:

With great respect to this Honorable Court, Your Honor, On May 29, 2025 was the hearing for; an Ejectment that was under Appeal, a Motion to Reconsider a WITHDRAWAL, an attached Motion for Ex Parte Possession and Temporary Injunction. The lack of application of Law and total bias was on display. The Plaintiffs' intentional violation of the Landlord Tenant Act and the lack of correcting of the Town of Kingstree Zoning Ordinance Violations were not held in account. There was sufficient evidence supporting **not** granting of the Ejectment, Ex Parte Possession and Temporary Injunction. Plaintiffs (Landlord) admitted not ensuring the provision of running water for 10 years and not repairing the heat for 24 years. They also confirmed they did no repairs, maintenance, upkeep or replacement from 2002-2019. The admitted to deserting/abandonment of the property from 2005-2016. The Plaintiff used deprivation/slander of character and untruth to make it seem as if they could not access the property because I was aggressive. Because of the Rent Bond payments, Zoning gave them the right to enter the property by scheduling and I wrote them a letter inviting them to come in and access and/or make plans, as they put me in a hotel. There was no response. I have made necessary corrections according to Zoning, for me and some that were cited to them as Owners of Records and some are still in process. The Plaintiffs (Landlord) was made fully aware that corrections and repairs have been and are being made. The continued use of this, is a fraudulent attempt upon this Honorable Court. I also hold and maintain the property adjoined. The attached Motion is a retaliation. I humbly ask for the Stay of Execution of Writ of Restitution pending appeal.

Your Honor, for the past twenty-four years I have put a good deal of my life and life's worth into the maintaining of the property, while the Plaintiffs have become unjustly enriched. Your Honor, there are not a lot or ready available housing and it would take time and expense to relocate. Having had to pay a rent bond and do the repairs has been a financial hardship. I did not miss a Rent Bond payment. I moved into 208 Madison Avenue Kingstree, SC 29556 in 2001. We started out with repair and deduct but the overall upkeep of the 1930 home became more than the rent. In 2002 they were notified there was no heat. They did not repair it. They also submitted to the Magistrate Court that they did not receive rent since 2002. We rented the downstairs. In 2006 was a storm, it blew shingles off the roof which caused it to leak. There was an order in the house. Upon investigating upstairs, there were wet mattresses, clothes and other items left by the Landlords. We removed them and started using upstairs. The Statue of Limitation in Civil Matter is three years. I have lived in continuous possession, actual, open, hostile and notorious (*Title 15 Chapter 67 Article 3 Section 15-67-210 & 260*). It has been enclosed and cultivated (*Title 15 Chapter 67 Section 15-67-240 & 250*). Your Honor, I claim adverse possession.

With Great Respect,

(Page 2)

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Genevieve Farmer Jacqueline King
Landlord/Plaintiff Ruth Richblorg

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LaShelle Mitchum Green
Tenant/Defendant

JUN 16 2025

LTB _____

SC Court of Appeals

APPLICATION TO STAY EXECUTION OF WRIT OF RESTITUTION

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State briefly the reasons why the Court should stay execution of the Writ of Restitution:

I did not receive Rule to Vacate or Show Cause
8/14/23 or 10/16/24. The Rent Bond was a conspiracy
to present me a tenant.

LaShelle Mitchum Green
Print name

[Signature]
Signature

208 Madison Ave
Address Kingstree, SC 29556

843-244-8703
Telephone Number

For everyone's protection, the U.S. Marshals Service supervises evictions and prepares the schedule of evictions in the afternoon on the day before those evictions are to take place. Evictions will continue to go forward unless a judge grants your Application. Therefore, you should file your Application as quickly as possible after the Writ has been issued. To reduce the risk that you could be evicted without your Application being heard, it will go before a judge the same day it is filed. You must file your Application by 2:00 p.m. unless the eviction is scheduled to take place on the day of filing or the next day. In that event, the Court will extend the deadline for filing until 4:00 p.m. If you miss the deadline, you must return the next day to file your Application. This allows the Court to conduct business in an orderly manner and to make sure that other cases are not unfairly interrupted. If you are not in the courtroom when your case is called, the Application may be denied.

NOTICE OF HEARING

Plaintiff/Plaintiff's Attorney (circle one) notified by telephone on (date) _____ by _____ Defendant's Attorney/ Clerk (circle one)

Response: Plaintiff **opposes** stay **and** (choose one) will appear in person for hearing today; or is available by telephone at (phone #) _____; or is unavailable and can appear on _____.

Plaintiff **consents** to a temporary stay until further hearing and is available for hearing on _____.
 Plaintiff **could not** be contacted at (phone number) _____. Message left at _____ a.m./p.m.

Copy mailed/hand-delivered (circle one) to Plaintiff/Plaintiff's Attorney (circle one) on _____ by the Clerk.

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11:59 PM

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LaSheila Mitchum Green
Print name

LaSheila Mitchum Green
Signature

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Address Kingstree, SC 29556

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