

**RECEIVED**

**Jun 24 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  
Benjamin H. Culbertson, Circuit Court Judge

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Case No. 2022-CP-26-4440  
Appellate Case No. 2023-000567

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Redfin Corporation, Christine LeFont, Rodolfo A. Pisigan Jr., Portia O. Pisigan, Jeremy Pisigan,  
and Cherry C. Pisigan, Defendants. Of Which Redfin Corporation is the Respondent.

Respondent,

v.

Hope Dukes and Nicole Dukes,  
Appellants

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#### RESPONSE TO RETURN MOTION TO DISMISS

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Appellants Hope Dukes and Nicole Dukes respectfully submit this reply in support of their Motion to Dismiss Redfin Corporation's Motion for Costs:

##### 1. Remittitur Was Not Received by Appellants

Appellants did not receive the Remittitur letter dated May 23, 2025, via mail. Instead, Appellants received only the Dispositional Opinion dated May 7, 2025, which they reasonably believed to be the final order of the Court. This confusion, combined with the lack of receipt of the Remittitur itself, prevented Appellants from being aware of the appropriate deadline under Rule 222(d), SCACR.

##### 2. Discretion Remains with the Court under Rule 222(a)

While Rule 222(a) uses the word "shall" in reference to the taxing of costs, it expressly provides that costs are taxed "unless otherwise ordered by the appellate court." This language leaves room for judicial discretion. South Carolina Courts have long recognized that equitable considerations may warrant denial or reduction of costs, particularly in cases involving good-faith appeals, public interest, or demonstrated financial hardship.

Appellants' appeal was brought in good faith, raising legitimate legal and factual issues, even if ultimately unsuccessful. The appeal was not frivolous, nor was it pursued for any improper purpose.

### 3. Equitable Considerations Warrant Denial of Costs

Respondents argue that equity is irrelevant; however, this is not supported by South Carolina precedent, which acknowledges equity in the administration of appellate justice. Importantly:

- Hope Dukes has been deemed disabled by the Social Security Administration.
- Nicole Dukes is a 100% Disabled United States Army War Veteran.

Both Appellants suffer from severe financial and physical hardships due to their disabilities. Imposing appellate costs under these circumstances would create an undue and disproportionate burden, especially when contrasted with the resources of a corporate respondent. **EXHIBIT A**

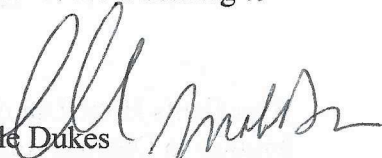
### 4. Appellants Respectfully Request Discretion Be Exercised

Appellants respectfully ask this Court to consider:

- The financial hardship that would result from an award of costs;
- The lack of bad faith or delay by Appellants;
- The good faith basis for the appeal and procedural confusion regarding the Remittitur;
- The significant disparity in financial resources between the parties.

Accordingly, Appellants respectfully request that this Court grant the Motion to Dismiss Redfin Corporation's Motion for Costs. In the alternative, Appellants request that the Court exercise its discretion under Rule 222(a) and decline to award costs, or schedule a hearing to allow equitable considerations to be fully assessed.

June 23, 2025

  
s/ Hope Dukes et al  
Hope Dukes & Nicole Dukes  
11 Crown Street  
Bloomfield, NJ 07003-4701  
(201) 304 – 1149  
(201) 560 – 2946

Prose

Other Counsel of Record:\nCheryl D. Shoun  
Nexsen Pruet, LLC  
205 King Street – Suite 400  
Charleston, SC 29401  
Attorney for Respondent  
(843) 720 – 1762

# **EXHIBIT**

**A**



## DEPARTMENT OF VETERANS AFFAIRS

June 24, 2025

Nicole Dukes  
241 Rice Terrace Dr  
Columbia, SC 29229

Dear Nicole Dukes:

This letter is a summary of benefits you currently receive from the Department of Veterans Affairs (VA). We are providing this letter to disabled Veterans to use in applying for benefits such as state or local property or vehicle tax relief, civil service preference, to obtain housing entitlements, free or reduced state park annual memberships, or any other program or entitlement in which verification of VA benefits is required. Please safeguard this important document. This letter is considered an official record of your VA entitlement.

Our records contain the following information:

### Personal Claim Information

Your VA claim number is: xxx-xx-9404

You are the Veteran.

### Military Information

Your most recent, verified periods of service (up to three) include:

Branch of Service	Character of Service	Entered Active Duty	Released/Discharged
Army	Honorable	December 08, 2008	November 25, 2009

(There may be additional periods of service not listed above.)

### VA Benefit Information

<b>You have one or more service-connected disabilities:</b>	Yes
<b>Your combined service-connected evaluation is:</b>	100%
<b>You are being paid at the 100 percent rate because you are unemployable due to your service-connected disabilities:</b>	Yes
<b>You are considered to be totally and permanently disabled due solely to your service-connected disabilities:</b>	Yes
<b>The effective date of when you became totally and permanently disabled due to your service-connected disabilities:</b>	April 16, 2016

You should contact your state or local office of Veterans' affairs for information on any tax, license, or fee-related benefits for which you may be eligible. State offices of Veterans' affairs are available at <http://www.va.gov/statedva.htm>.

## How You Can Contact Us

- If you need general information about benefits and eligibility, please visit us at <https://www.va.gov>.
- Call us at [1-800-827-1000](tel:1-800-827-1000).
- Contact us using Telecommunications Relay Services (TTY) at 711 24/7.
- Send electronic inquiries through the Internet at <https://www.va.gov/contact-us>.

Sincerely Yours,

**Regional Office Director**





# Social Security Administration Benefit Verification Letter

Date: June 23, 2025  
BNC#: 25VF688H82178  
REF: A



HOPE DUKES  
11 CROWN STREET  
BLOOMFIELD NJ 07003-4701

\*0101BEV4UAG4N4J\* CCM.M72.BEV4U.R250623

You asked us for information from your record. The information that you requested is shown below. If you want anyone else to have this information, you may send them this letter.

## Information About Current Social Security Benefits

Beginning December 2024, the full monthly Social Security benefit before any deductions is [REDACTED].

We deduct \$ [REDACTED] for medical insurance premiums each month.

The regular monthly Social Security payment is [REDACTED].  
(We must round down to the whole dollar.)

Social Security benefits for a given month are paid the following month. (For example, Social Security benefits for March are paid in April.)

Your Social Security benefits are paid on or about the third of each month.

We found that you became disabled under our rules on January 29, 2013.

## Information About Past Social Security Benefits

From December 2023 to November 2024, the full monthly Social Security benefit before any deductions was [REDACTED].

We deducted \$ [REDACTED] for medical insurance premiums each month.

The regular monthly Social Security payment was \$2,631.00.  
(We must round down to the whole dollar.)

## Type of Social Security Benefit Information

You are entitled to monthly disability benefits.

See Next Page

**Medicare Information**

You are entitled to hospital insurance under Medicare beginning July 2015.

You are entitled to medical insurance under Medicare beginning July 2015.

Your Medicare number is ~~XXXXXXXXXX~~. You may use this number to get medical services while waiting for your Medicare card.

If you have any questions, please log into Medicare.gov, or call 1-800-MEDICARE (1-800-633-4227).

**Date of Birth Information**

The date of birth shown on our records is January 8, 1983.

**Suspect Social Security Fraud?**

Please visit <http://oig.ssa.gov/r> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

**If You Have Questions****Need more help?**

1. Visit [www.ssa.gov](http://www.ssa.gov) for fast, simple and secure online service.
2. Call us at 1-800-772-1213, weekdays from 8:00 am to 7:00 pm. If you are deaf or hard of hearing, call TTY 1-800-325-0778. Please mention this letter when you call.
3. You may also call your local office at 1-866-964-0170.

SOCIAL SECURITY  
FL 2  
935 ALLWOOD RD  
CLIFTON NJ 07012

**How are we doing?** Go to [www.ssa.gov/feedback](http://www.ssa.gov/feedback) to tell us.

*Social Security Administration*

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Jeremy Pisigan,  
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Respondent.  
Respondent,  
v.  
Hope Dukes and Nicole Dukes,  
Appellants

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MOTION TO DISMISS - Response To Return

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PROOF OF SERVICE

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The undersigned certifies that the Motion to Dismiss Response To Return by Hope and Nicole Dukes was served on Redfin Corporation, Christine LeFont, Rodolfo A. Pisigan Jr., Portia O. Pisigan, Jeremy Pisigan and Cherry C. Pisigan,

Defendants. Of Which Redfin Corporation is the Respondent via U.S. mail delivery on June 23, 2025.

June 23, 2025 s/ Hope Dukes et al

Hope Dukes & Nicole Dukes

11 Crown Street

Bloomfield, NJ 07003-4701

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Other Counsel of Record: \

Cheryl D. Shoun

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Attorney for Respondent

(843) 720 – 1762