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Jul 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas

Case No. 2023-CP-19-00117

MORTGAGE ASSETS MANAGEMENT, LLC
Respondent,

v.

Any Heirs-at-Law or Devises of Paulette C. Mims, Deceased, their Heirs, Personal Representatives, Administrators, Successors and Assigns, and All Other Persons or Entities Entitled to Claim Through Them; All Unknown Persons or Entities with any Right, Title, Estate, Interest in or Lien Upon the Real Estate Described in the Complaint Herein; Also any Persons Who May be in the Military Service of the United States of America, Being a Class Designated as Richard Roe; And any Unknown Minors, Incompetent or Imprisoned Person, or Persons Under a Disability Being a Class Designated as John Doe; Stuart Crocket Mims; Julian L. Mims, IV; Florence Adams Mims; United States of America Acting by and Through Its Agency the Department of Housing and Urban Development, Defendants, of whom Julian L. Mims, IV, as Personal Representative of Paulette C. Mims, Deceased, is the Appellant.

APPELLANT'S INITIAL BRIEF

Elizabeth Brown, Esquire
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APPELLANT'S INITIAL BRIEF

Appeals Case: Mortgage Assets Management, LLC v. Julian L. Mims, IV- 2024-000649
Estate of Paulette-Mims-611 Buncombe Street-Edgefield, SC 29824

Plaintiff's Argument: The estate has a reverse mortgage balance and fees owed
to Mortgage Assets Management, LLC

Appellant's Argument: The foreclosure newspaper has committed the following crimes
against the Appellant's farm in Aiken County and the estate of Marie Mims
in Edgefield County:

SECTION 16-13-230.Breach of trust with fraudulent intent

SECTION 16-13-30.Grand larceny

SECTION 16-17-640.Blackmail

SECTION 16-16-20.Computer crime offenses

SECTION 16-5-10.Conspiracy against civil rights.

Appellant's Conclusion: The foreclosure newspaper is criminally liable for SC code
violations against the Appellant. The physical items of the Marie Mims estate must be
returned.

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**PROOF OF SERVICE OF AN INITIAL BRIEF
AND DESIGNATION OF MATTER**

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Case No. 2023-CP-19-00117

MORTGAGE ASSETS MANAGEMENT, LLC

Respondent,

v.

Julian Mims IV

Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant's Initial Brief and Designation of Matter on MORTGAGE ASSETS MANAGEMENT, LLC, by depositing a copy of it in the United States Mail, postage prepaid, on July 21, 2025, addressed to the attorneys of record, **Robertson, Anschutz, Schneid, Crane & Partners, PLLC**
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