

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM HORRY COUNTY  
COURT OF COMMON PLEAS

JUDGE ALAN CLEMMONS, MASTER-IN-EQUITY

APPELLATE CASE NO. 2024-001119

**SPECIALIZED LOAN SERVICING LLC...RESPONDENT**

V.

**Cindy B. Hunt; Willow Greens**

**Homeowners Association, Inc.;**

**CJ Developers, LLC.....Defendants,**

**Of Whom Cindy B. Hunt is .....Appellant**

**REPLY BRIEF TO INITIAL BRIEF of Respondent  
AND DESIGNATION OF MATTER**

CINDY B, HUNT, PRO SE, SC BAR# 65408

195 D WILLOW GREEN DRIVE

CONWAY, SC 29526

843 488-1131

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**INDEX 1<sup>st</sup> Appeal see enclosed attachment.<sup>1</sup>**

## ***INDEX – 2<sup>nd</sup> Appeal***

### **A. Orders/Judgments – lawsuit #4 continuation**

**11/5/2020 Order** - substitution of counsel<sup>2</sup> 1984-1985

**11/17/2021 Order** – Form 4 Order at pp. 2173-2175.<sup>3</sup> Signed by Judge Culbertson who was not the master -in-equity.

**5/10/2022 Order** - substitution of Plaintiff (order signed by Judge Clemmons void motion written by Burgess). See pp. 2233-2238

**11/21/2023 Order of SC Supreme Court**  
pp. 1-4

**6/26/2024** Master In Equity's **Order and Judgment** of Foreclosure & Sale Deficiency Waived pp. 1-20 void<sup>4</sup> Order written by attorney Burgess & signed by Judge Clemmons.

### **B. CHANGE OF NAME FROM BBT TO TRUIST**

**10/23/2020 Consent Motion and Order substituting counsel- part1.**<sup>5</sup> PP. 1953-1955, 1984-2005, (pp. 1999).

**10/28/2020 Certificate of service by mail**

<sup>1</sup> V.1 pp. 1-492; V.2 pp. 493-958; V.3 pp. 959-1452; V. 4 pp. 1453-1942. See pp. 2240, 5005; and Entry of Public Index case number 2013cp2602528

<sup>2</sup> Signed by Judge Culbertson who was not the Master-in-equity.

<sup>3</sup> See **10/27/2021** Motion under **Rule 59**: re Order filed on 11/05/2020 at **Pages 2078-2112**; and **11/4/2021** Motion under **Rule 60**: re Order filed on 11/05/2020 at **Pages 2113-2238**.

<sup>4</sup> See void: 1984-1985, 2173-2175, 2257-2258

<sup>5</sup> See void: 1984-1985, 2173-2175, 2257-2258

**consenting to substitution of counsel- part2.<sup>6</sup> PP. 1999-2001 & 1986-2005, (pp. 2000).**

**C. MOTIONS BY APPELLANT HUNT & counter affidavit & misc.**

1. **10/28/2020** Motion-Rule 11, SCRCP  
**Pages 1956-1973**
2. **10/28/2020** Motion- Abuse of Process  
**Pages 1974-1980**
3. **11/05/2020** Amended Objections to Plaintiff's Motion to Substitute Counsel/Response  
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4. **12/17/2020** Motion- **Rule 60**, Fraud upon the Court and Civil Conspiracy  
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**Pages 2239-2270**
8. **1/16/2024** Motion re lack of subject matter jurisdiction, etc.  
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**Burgess's on 5/6/2022 filed the void<sup>7</sup> Motion to substitute Plaintiff. See Pp. 2204-2206.**

**On 9/7/2023 an Affidavit of Non-Military Status was filed by the Office of Brock and Scott.<sup>8</sup>**

<sup>6</sup> See void: 1984-1985, 2173-2175, 2257-2258

<sup>7</sup> See void:1984-1985, 2173-2175, 2257-2258

<sup>8</sup> See void: 1984-1985, 2173-2175, 2257-2258

On **11/15/2023** did the **SCSC** file an **Order** dismissing pursuant to **Key v. Currie, 406 S.E.2d 356, 305 S.C. 115 (S.C. 1991)** the Motion/Petition for Writ of Mandamus dated June 1, 2022<sup>9</sup> that resulted in a **Circuit Court** trial? **Yes. See 3/5/2024 & 5/8/2024 transcripts; and Seventh Motion herein.**

**Did Hunt on 11/30/2023 file an AMENDED REPLY TO BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS? Yes. See pp. 4996-5000.**

**9. On 5/6/2024 Hunt filed Counter Affidavit by Hunt See pp. 6028-6094.**

**C. 2/1/2024 Facts & Procedural History by Hunt pp. 5032-5048**

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- 2. Memorandum #2 re 10/28/2020 Motion - Abuse of Process<sup>11</sup> Pages 5060-5069**
- 3. Memorandum #3 re 11/5/2020 Amended Objections to Plaintiff's Motion to Substitute Counsel/Response<sup>12</sup> Pages 5070-5077**
- 4. Memorandum #4 12/17/2020 Motion- Rule 60, Fraud upon the Court and Civil Conspiracy<sup>13</sup> Pages 5078-5104**
- 5. Memorandum #5 10/27/2021 Motion under Rule**

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<sup>9</sup> See Appellate Case 2022-000758

**1. 11/15/2023 Order of SCSC**

<sup>10</sup> FILED ON 2/1/2024.

<sup>11</sup> FILED ON 2/1/2024.

<sup>12</sup> FILED ON 2/1/2024.

<sup>13</sup> FILED ON 2/1/2024.

59: re Order filed on 11/05/2020<sup>14</sup> **Pages 5105-5121**

6. **Memorandum #6 11/4/2021** Motion under Rule 60: re Order filed on 11/05/2020<sup>15</sup> **Pages 5122-5132**
7. **Memorandum #7 5/26/2022** Motion under Rule 59: re Order filed on 5/10/2022<sup>16</sup> **Pages 5133-5141**
8. **Memorandum #8 1/16/2024** Motion re lack of subject matter jurisdiction, etc.<sup>17</sup> **Pages 5142-5150**

#### **E. Emails**

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**3/28/2024 email**

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**5/8/2024 transcript**

#### **G. BRIEFS by attorney BURGESS**

**2/15/2024<sup>19</sup> BRIEF IN RESPONSE TO DEFENDANT'S AMENDED MOTION FOR A WRIT OF MANDAMUS FILED JUNE 14, 2022**

**2/15/2024<sup>20</sup> BRIEF IN RESPONSE TO**

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<sup>14</sup> FILED ON 2/1/2024.

<sup>15</sup> FILED ON 2/1/2024.

<sup>16</sup> FILED ON 2/1/2024.

<sup>17</sup> FILED ON 2/1/2024.

<sup>18</sup> The 3/5/2024 TRANSCRIPT states that the hearing/trial ended at 11:48 am. The 3/5/2024 2:02 PM email states "AS YOU KNOW, JUDGE CLEMMONS HAS TAKEN THE ABOVE-REFERENCED CASE UNDER ADVISEMENT. PRIOR TO RULING, THE COURT WILL REQUIRE ADDITIONAL INFORMATION REGARDING ATTORNEY'S FEES AND COSTS ..." Hunt filed the Counter Affidavit on 5/6/2024 at pp. 6028-6094.

<sup>19</sup> See void:1984-1985, 2173-2175, 2257-2258

<sup>20</sup> See void:1984-1985, 2173-2175, 2257-2258

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**STATEMENT OF ISSUES ON APPEAL ...154**

**MOTIONS & COUNTER AFFIDAVIT**

1. Did the Master abuse his discretion in denying the 10/28/2020 Motion-Rule 11, SCRCF where the record does not contain contemporaneous objections to the Rule 11 Motion?
2. Did the Master abuse his discretion in denying the 10/28/2020 Motion- Abuse of Process where the record does not contain contemporaneous objections to the Abuse of Process Motion?
3. Did the Master abuse his discretion in denying the 11/05/2020 Amended Objections to Plaintiff's Motion to Substitute Counsel/Response where the record does not contain contemporaneous objections to the Amended Objections to Plaintiff's Motion to Substitute Counsel/Response Motion?
4. Did the Master abuse his discretion in denying the 12/17/2020 Motion- Rule 60, Fraud upon the Court and Civil Conspiracy where the record does not contain

contemporaneous objections to the 12/17/2020 Motion?

5. Did the Master abuse his discretion in denying the 10/27/2021 Motion under Rule 59: re Order filed on 11/05/2020 where the record does not contain contemporaneous objections to the 10/27/2021 Motion under Rule 59: re Order filed on 11/5/2020?

6. Did the Master abuse his discretion in denying the 11/4/2021 Motion under Rule 60: re Order filed on 11/05/2020 where the record does not contain contemporaneous objections to the 11/4/2021 Motion under Rule 60: re Order filed on 11/5/2020?

7. Did the Master abuse his discretion in denying the 5/26/2022 Motion under Rule 59: re Order filed on 5/10/2022 where the record does not contain contemporaneous objections to the 5/26/2022 Motion under Rule 59: re Order filed on 5/10/2022?

8. Did the Master abuse his discretion in denying the 1/16/2024 Motion re lack of Subject Matter Jurisdiction, etc. where the record does not contain contemporaneous objections to the 1/16/2024 Motion re lack of Subject Matter Jurisdiction, etc.? <sup>21</sup>

**9. Counter Affidavit: Did Hunt preserve for review by the court that BBT/SLS had engaged in the Doctrine of Unclean Hands, Lack of Standing, Illegality, Laches and a few acts of allegations of forgery where Hunt had **already filed two Rule 59 motions to alter or amend the judgement in order to preserve all of HUNT'S issues that were contained in the COUNTER AFFIDAVIT** for appellate review?<sup>22</sup> See pp. 6028-6094**

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<sup>21</sup> See pp. 5030

<sup>22</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

**STATEMENT OF THE ISSUES..... 16**

Did Hunt's **5/30/2007** Customer Profile at BBT include the loans Transfer Management & Portfolio that were not Hunt's loans? **Yes. See pp. 6059-6060.**

Did Hunt's **5/30/2007** Customer profile at BBT **also include Hunt's Conventional mortgage with a balance of \$147,063.66. Yes. See pp. 6057-6059.**

On **10/21/2010** did BBT return the HCPD search warrant stating: "...We are unable to produce documents as requested. ..."? **Yes. See pp. 1493-1495, 1498-1499.**

On **11/8/2010** did HCPD write to the FDIC-OIG concerning the allegations of misuse of Hunt's assets that were on deposit at BBT bank? **Yes. See pp. 1818-1820.**

Does the **5/8/2019 letter to SLED show** that BBT sent stalkers to hunt's home? **Yes. See pp. 2318-2326.**

On **4/16/2013** did BBT hire the firm of **ROGERS TOWNSEND & THOMAS, PC** to file **lawsuit #4** in state court against Hunt and others for **foreclosure**, asserting that it as Plaintiff had the legal right to enforce the negotiable instrument secured by the Mortgage and is the real party in interest as defined by Rule 17(a) of the SCRPC? **YES. See pp. 261-272 & 264.**

On **6/6/2014** Hunt filed **FIRST AMENDED COUNTERCLAIMS. See pp. 299-338.**

BBT has never made a **REPLY** to Hunt's first amended counterclaims. **See Rule 7, pp. 299-338 and counter affidavit at pp. 6028-6094.**

On **11/10/2014** Hunt made a notice of removal to the USDC. **See pp. 1110-1118.**

On **1/3/2015** attorney Foerster stated in an affidavit to the USDC that BBT engaged Rogers, Townsend, & Thomas PC to handle the foreclosure action against Hunt. **See pp. 1879-1880**

On **8/14/2017** Hunt filed the final brief of the Appellant and the ROA to the SCCA. See pp. 2407 of FBOTA.

**Does the 5/8/2019 letter to SLED show that BBT sent stalkers to Hunt's home? Yes. See pp. 2318-2326.**

On **12/10/2019** Stuart Lee filed articles of organization for **ROGERS TOWNSEND, LLC. See pp. 1998, 1943-1980, 1986-2005, 6034-6039.**

On **12/18/2019** the SCCA affirmed the ruling of the master-in-equity in the Unpublished Opinion No. 2019-UP-389.

During **appeal** on **1/10/2020, 1/23/2020, 4/3/2020, 4/15/2020 and 5/20/2020** did BBT without a motion for merger or relief or substitution of counsel go **from Rogers Townsend & Thomas, PC to Rogers Townsend, LLC** – where attorney Sean Foerster inserted into these proceedings **during appeal** the name of Rogers Townsend, LLC as the attorneys for Respondent BBT? **Yes. See pp. 1943-1955.**

On **10/19/2020** the SCCA **remitted** the case to Horry County and the remit was received on 10/21/2020. **See pp. 1948-1951.**

Thereafter, the following occurred:

On **10/23/2020** BBT **U.S. mailed<sup>23</sup> to Hunt a copy of the Consent Motion and Order Substituting Counsel.** See pp. 1953-1955 & 2242.

**And on a 2/5/2024 NOTICE OF HEARING from RESPONDANT states: YOU WILL PLEASE TAKE**

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<sup>23</sup> See Rule (6e), SCRCP.

NOTICE THAT, by virtue of the **ORDER OF REFERENCE** issued in the above-entitled cause, The Honorable Alan D. Clemmons, Master in Equity for Horry County, has appointed March 5, 2024 at 10:00 at 1301 2<sup>nd</sup> Avenue, Horry County Courthouse, 3<sup>rd</sup> floor, Conway, SC 29526, as the time and place for holding a hearing on all pending motions and a bench trial. ...

**The pending motions, memos & counter affidavit at the time of trial were:**

1. On **10/28/2020** Hunt had filed: Motion-Rule 11. **See pp. 1956-1973, pp. 5049-5050. And on 5/26/2022 still no reply from BBT. See pp. 2242, 5040**

Memorandums #1-8 were requested by the court and Hunt timely filed Memorandums #1-8 on Feb 1, 2024

2. On **10/28/2020** Hunt had filed: Motion-Abuse of Process. **See pp. 1974-1980, 5060-5069. On 5/26/2022 still no reply from BBT. See pp. 2242-2243, 5040.**

And on **10/28/2020** when heading to the court house Hunt **received** BBT's **10/23/2020** motion and proposed consent order. Hunt sat down and wrote the short: **Objection to Plaintiff's Motion to Substitute Counsel. See pp. 1981-1983 & 2243.**

On **11/5/2020** at **1:08 Judge Culbertson**, who **was not and is not** the master in equity **signed** the order to substitute counsel for BBT. **See pp. 1984-1985 & 2243.**

3. On **11/5/2020** at **3:05** Hunt had filed: **Amended Objections** to Plaintiff's Motion to Substitute Counsel/Response. **See pp. 1986-2005, 5070-5077 & 2244, 5042.**

4. On **12/17/2020** Hunt filed Motion – Rule 60, Fraud Upon the Court and Civil Conspiracy. **See pp. 2006-2069, 5078-5104, 2244 & 5042.**

5. On **10/27/2021** Hunt filed Motion under Rule 59: re Order filed on 11/5/2020. **See pp. 2078-2110, 5105-5121, 2245 & 5042.**

6. On **11/4/2021** Hunt filed Motion under Rule 60: re Order filed on 11/5/2020. **See pp. 2113-2172/2238, 2245 & 5042.**

**7. On 5/26/2022 Hunt filed Motion under Rule 59: re Order filed on 5/10/2022. See pages 2239-2271, 5142-5150, 5045**

8. On **1/16/2024** Hunt filed Motion re lack of subject matter jurisdiction, etc. **See Pages 5001-5031, 5142-5150 & 5046.**

During the **requested STAY** on 9/7/2023 did the Office of Brock and Scott without Hunt's permission file an Affidavit of Non-Military Status? **Yes.**<sup>24</sup>

On **11/15/2023** did the **SCSC** file an **Order** dismissing pursuant to **Key v. Currie, 406 S.E.2d 356, 305 S.C. 115 (S.C. 1991)** the Motion/Petition for Writ of Mandamus dated June 1, 2022<sup>25</sup> that resulted in a **Circuit Court trial? Yes. See 3/5/2024 & 5/8/2024 transcripts; and Seventh Motion herein.**

**Did Hunt on 11/30/2023 file an AMENDED REPLY TO BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS? Yes. See pp. 4996-5000.**

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<sup>24</sup> See void: 1984-1985, 2173-2175, 2257-2258

<sup>25</sup> See Appellate Case 2022-000758

1. 11/15/2023 Order of SCSC

On 5/6/2022, did attorney Burgess, **make a void**<sup>26</sup> **motion** to substitute from Plaintiff BBT to Plaintiff SLS? Yes. **See pp. 2204-2206.**

On 5/10/2022 at 9:14 Judge Clemmons, e-filed the signed 5/6/2022 void<sup>27</sup> motion into an Order of substitution from Plaintiff BBT to Plaintiff SLS. **See pp. 2233-2238.**

On **5/26/2022** did Hunt filed a **Motion under Rule 59**: re Order filed on 5/10/2022? Yes. **See pp. 2239-2271 & 5045.**

*On 6/1/2022 Hunt mailed a Motion/Petition for Writ of Mandamus to the SCSC. See pp. 2233-2239 & 5045*

**On 6/3/2022 at 16:01 attorney Burgess filed the void**<sup>28</sup> **BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS. Mailed on 6/1/22 to SCSC & Circuit Court**

On **6/14/2022** did **Hunt file/mail** the **Amended Motion/Petition for Writ of Mandamus** to the **SCSC and attorney Burgess**? **Yes. See p. 5045-5048.**

**At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not** make contemporaneous objections to Hunt's: Amended Motion/Petition for Writ of Mandamus filed **June 14, 2022.**

Did attorney Burgess write the **void**<sup>29</sup> **6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived where at page 2 at paragraph 7 at item 7) he forged**<sup>30</sup> **the: Amended Motion/Petition for Writ of Mandamus**

<sup>26</sup> See pp.1984-1985, 2173-2175, 2257-2258, 2239-2271.

<sup>27</sup> See pp.1984-1985, 2173-2175, 2257-2258, 2239-2271.

<sup>28</sup> See pp.1984-1985, 2173-2175, 2257-2258, 2239-2271.

<sup>29</sup> See p.p. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>30</sup> See p. 2090-2105 for Forgery and S.C. Code 16-13-10.

filed June 14, 2022 in the SCSC<sup>31</sup>? **Yes.**

Did attorney Burgess insert into this matter on **6/26/2024** the name of a document that Hunt had previously submitted to the SCSC on **June 14, 2022** that had been ruled on by the SCSC on **11/15/2023: the Amended Motion/Petition for Writ of Mandamus filed June 14, 2022<sup>32</sup> to the SCSC into the 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 7)? **Yes. See Seventh Motion herein.****

Was the 6/1/2022 & 6/14/2022 **Brief STAYED as of 6/1/2022** pursuant to Rule 240 and Randolph v. S.C. Dep't of Health & Human Servs. (South Carolina Administrative Law Court, 2013)? **Yes, see Rule 240, SCACR and Randolph v. S.C. Dep't of Health & Human Servs. (South Carolina Administrative Law Court, 2013) and p. 5045.**

Hunt has never been in the U.S. Military.

**Did attorney Burgess write-into the void<sup>33</sup> 6/26/2024 Master In Equity's Order and Judgment of foreclosure and sale Deficiency Waived at page 2 paragraph 7 item 8: Motion related to subject matter jurisdiction filed January 16, 2024? **Yes. See void<sup>34</sup> 6/26/2024 Master In Equity's Order and Judgment of foreclosure and sale Deficiency Waived; & Forgery at pp 2090-2105.****

On **2/1/2024** did Hunt file 8 memorandums and a memorandum of facts and procedural history for all

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<sup>31</sup> See Appellate Case 2022-000758

1. 11/15/2023 Order of SCSC

<sup>32</sup> See Appellate Case 2022-000758

1. 11/21/2023 Order of SCSC

<sup>33</sup> See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.

<sup>34</sup> See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.

memo's as requested by the court? **Yes, see pp.xx**

On **2/5/2024** did Respondent file NOTICE OF HEARING ON HUNT where the circuit court schedule a trial for 3/5/2024? **Yes.**

**Did the 2/5/2024 notice of hearing from attorney Burgess state that Judge Clemmons has appointed March 5, 2024, as the time and place for holding a hearing on all pending motions and a bench trial? Yes.**

On **2/15/2024** attorney Burgess filed a BRIEF IN RESPONSE TO DEFENDANT'S AMENDED MOTION FOR A WRIT OF MANDAMUS FILED **JUNE 14, 2022.**

On **2/15/2024** attorney Burgess filed a BRIEF IN RESPONSE to DEFENDANT'S **JANUARY 16, 2024** MOTION.

**On 3/5/2024** after the trial was over Hunt received an email from the office of Sherri McAllister/Judge Clemmons addressed to both: Hunt and attorney Burgess. **See 3/5/2024 email.**

**On 3/27/2024** Hunt received an email from Ms. McAllister of Judge Clemmons office.

**On 3/28/2024** Hunt wrote an email to Ms. McAllister and Mr. Burgess.

On **4/17/2024** did the circuit court schedule a trial for 5/8/2024? **Yes. See 4/17/2024 notice of hearing from attorney Burgess.**

On **5/6/2024** did Hunt filed a Counter Affidavit<sup>35</sup> to satisfy the March 5, 2024 email pursuant to Dedes vs. Strickland, (414 S.E. 2d. 134)? **Yes. See pp. 6028-6094.**

**On 7/1/2024** Hunt filed a Notice of Appeal to the

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<sup>35</sup> The counter affidavit contains Hunt's resume and an affidavit of attorney fees and other affidavits that satisfy the six factors of Baron Data Systems, Inc. v. Loter, 297 S.C. 382, 377 S.E.2d 296 (S.C. 1988).

SCCA.

On 7/8/2024 Hunt made a motion to Amend the Notice of Appeal to SCCA to add the Orders of JUDGE HOWE AND THE 12/18/2019 UNPUBLISHED OPINION.

**Arguments .....19**

**STANDARD OF REVIEW.....**

"An abuse of discretion arises where the judge issuing the order was controlled by an error of law or where the order is based on factual conclusions that are without evidentiary support..." **Bb & T v. Taylor, 633 S.E.2d 501, 369 S.C. 548 (S.C. 2006).**

### **ARGUMENTS**

The Court must reverse the Master's Order entered on June 26, 2024 **for the following reasons:**

"It is well-settled that issues relating to subject matter jurisdiction maybe raised at any time." **Bardoon Properties, NV v. Eidolon Corp., 485 S.E.2d 371, 326 S.C. 166 (S.C. 1997). See pp. 2257-2268, 2239-2271.**

Can the stench from the **lack of subject matter jurisdiction on** the 11/5/2020 order (substitution of counsel involving attorney Burgess) **and** 11/17/2021 judgment/orders of Judge Culbertson, who was not the master in equity and thus are **void** in this matter also involving **deprivation of due process be washed away? No. See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271**

The **2/5/2024 NOTICE OF HEARING** stated ... time and place for holding a hearing on all pending motions and a bench trial thus: **HUNT'S DESIGNATION OF MATTER AND ARGUMENTS** include all 8 named motions & all 8 memorandums and a counter affidavit.

1. **FIRST Motion:**

On 10/28/2020 Hunt filed: **Motion – Rule 11, SCRPC. BBT did not Reply. See pp. 2242 of Motion Seven.**

**At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not** make contemporaneous objections to Hunt's 10/28/2020 Motion - Rule 11, SCRPC. **See pp. 1956-1973, pp. 5049-5059<sup>36</sup>. See Transcripts, "The failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

However, a few weeks after the trials when attorney Burgess wrote the **void<sup>37</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 1)** he ignored that waiver applied where he had made no contemporaneous objections to Hunt's Rule 11 Motion and he thereafter **inserted from the void<sup>38</sup> 6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS:** Defendant's Motion / Petition for Writ of certiorari filed October 28, 2020 **into the 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 1.**

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<sup>36</sup> This and each memorandum were filed on Feb 1, 2024, as requested by the court . And see pp. 5049-5059 for Rule 11 violations, sanctions, and damages requested.

<sup>37</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>38</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

The master in equity did abuse his discretion in denying Defendant Hunt's 10/28/2020 Motion - Rule 11, SCRPC that was subject to a waiver of the right to object.

**2. SECOND MOTION: At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not make contemporaneous objections to Hunt's **10/28/2020** Motion - Abuse of Process. See **pp. 1974-1980 & 5060-5069**<sup>39</sup>; see Transcripts, "The failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." *Doe v. S.B.M.*, 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997);**

However, a few weeks later when attorney Burgess wrote the **void**<sup>40</sup> **6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 2)** he ignored that waiver applied where he had made no contemporaneous objections to Hunt's **10/28/2020** Motion - Abuse of Process and he inserted from his **void**<sup>41</sup> **6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS: Defendant's Motion Re Abuse of Process filed October 28, 2020 into the 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 2.**

The master in equity did abuse his discretion in denying Defendant's Hunt's **10/28/2020** Motion - Abuse of Process that was subject to a waiver of the right to object.

**3. THIRD MOTION: At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not make contemporaneous objections to**

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<sup>39</sup> See PP. 5060-5069: violations, sanctions, and damages requested.

<sup>40</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>41</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

Hunt's **11/05/2020** Amended Objections To Plaintiff's Motion - To Substitute Counsel/Response. See **pp. 1986-2005 & 5070-5077**<sup>42</sup> and See Transcripts, "The failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).

However, a few weeks later when attorney Burgess wrote the **void**<sup>43</sup> **6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 3)** he ignored that waiver applied where he had made no contemporaneous objections to Hunt's **11/05/2020** Amended Objections To Plaintiff's Motion - To Substitute Counsel/Response and he inserted from his **void**<sup>44</sup> **6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS: Defendant's SCRPC Rule 11 Motion** filed October 28, 2020 into the **6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 3.**

The master in equity did abuse his discretion in denying Defendant Hunt's **11/05/2020** Amended Objections To Plaintiff's Motion - To Substitute Counsel/Response that was subject to a waiver of the right to object.

4. **FOURTH MOTION: At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not** make contemporaneous objections to Hunt's **12/17/2020** Motion Rule 60, Fraud upon the Court and Civil Conspiracy. **See pp. 2006-2069, 5078-5104**<sup>45</sup>, See Transcripts, "The

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<sup>42</sup> See PP. 5070-5077 for violations, sanctions, and damages requested.

<sup>43</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>44</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>45</sup> See PP. 5078-5104: violations, sanctions, and damages requested.

**failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

However, a few weeks later when attorney Burgess wrote the **void<sup>46</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 4)** he ignored that waiver applied where he had **made no** contemporaneous objections to Hunt' **12/17/2020** Motion Rule 60, Fraud upon the Court and Civil Conspiracy **and he inserted from his void<sup>47</sup> 6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS: Defendant's SCRPC Rule 60 Motion** Re: Fraud upon the Court and Civil Conspiracy filed December 17,2020 into the **6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 4.**

The master in equity did abuse his discretion in denying Defendant's Hunt's **12/17/2020** Motion Rule 60, Fraud upon the Court and Civil Conspiracy that was subject to a waiver of the right to object.

**5. FIFTH MOTION: At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not make contemporaneous objections to Hunt's **10/27/2021** Motion - Rule 59: re Order filed on 11/05/2020. **See pp. 2078-2110 & pp. 5105-5121<sup>48</sup>**; see Transcript, "The failure to make an objection at the time evidence is offered constitutes a**

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<sup>46</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>47</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>48</sup> See PP. 5105-5121 for violations, sanctions, and damages requested.

**waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

However, a few weeks later when attorney Burgess wrote the **void<sup>49</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 5)** he ignored that waiver applied where he had **made no** contemporaneous objections to Hunt's **10/27/2021** Motion - Rule 59: re Order filed on 11/05/2020 and he inserted from his **void<sup>50</sup> 6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS: Defendant's SCRPC Rule 59 Motion regarding the May 10, 2022, Order to Substitute Plaintiff into the 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 5.**

The master in equity did abuse his discretion in denying Defendant Hunt's **10/27/2021** Motion - Rule 59: re Order filed on 11/05/2020 that was subject to a waiver of the right to object.

6. SIXTH MOTION: **At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not** make contemporaneous objections to Hunt's **11/4/2021** Motion - Rule 60: re Order filed on 11/05/2020. **See pp. 2113-2172/2238 and memorandum at pp. 5122-5132<sup>51</sup>; see Transcripts, "The failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

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<sup>49</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>50</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>51</sup> See PP. 5122-5132 for violations, sanctions, and damages requested.

However, a few weeks later when attorney Burgess wrote the **void<sup>52</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 6)** he ignored that waiver applied where he had made no contemporaneous objections to Hunt's **11/4/2021** Motion - Rule 60: re Order filed on 11/05/2020 **and he inserted from his void<sup>53</sup> 6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS:** Defendant's Motion/Petition for Writ of Mandamus filed June 3, 2022 into the 6/26/2024 **Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 6.**

The master in equity did abuse his discretion in denying Defendant Hunt's **11/4/2021** Motion - Rule 60: re Order filed on 11/05/2020 that was subject to a waiver of the right to object.

**7. SEVENTH MOTION: At trail on 3/5/2024 and 5/8/2024 attorney Burgess did not make contemporaneous objections to Hunt's **5/26/2022 Motion under Rule 59: re Order filed on 5/10/2022 at pp. 2239-2271 and memorandum at pp. 5133-5141<sup>54</sup>. See Transcripts, "The failure to make an objection at the time evidence is****

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<sup>52</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>53</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>54</sup> See PP. 5133-5141 for violations, sanctions, and damages requested.

**offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

However, a few weeks **after** the **3/5/2024 and 5/8/2024** trials attorney Burgess wrote the **void<sup>55</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 7** where he continued to **ignore that waiver applied where attorney Burgess had made no contemporaneous objections to Hunt's 5/26/2022 Motion under Rule 59: re Order filed on 5/10/2022.**

Did attorney Burgess for BBT/SLS **falsely** state to the Court on 6/26/2024<sup>56</sup> that he had filed 'Amended motion/petition for Writ of mandamus filed June 14, 2022'? **Yes. See the void<sup>57</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 7; SC Code 16-13-10 at pp. 2090; and State v. Brandt, 393 S.C. 526, 540, 713 S.E.2d 591 (S.C. 2011) pp. 2078-2107.**

Thus, did attorney Burgess write by forging into this matter on 6/26/2024<sup>58</sup> the name of a document that **Hunt** had previously submitted to the SCSC that had been **dismissed** pursuant to Key v. Currie, 305 S. C. 115 (S.C. 1991) by the SCSC on **11/15/2023. And that order from the SCSC dismissing the motion/petition was received by the circuit court on 11/21/2023-09:08** the Amended Motion/Petition for Writ of Mandamus filed June 14, 2022<sup>59</sup> into the 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 7)? **Yes.**

Does the **6/14/2022-14:34** Horry County Public Index show that it was filed by **Hunt at the Horry County Public Index, Branch Banking and Trust Company, Plaintiff, et al vs. Cindy B. Hunt, defendant, et al Case Number 2013CP2602528**? **Yes.**

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<sup>55</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>56</sup> See pp. 2090-2105.

<sup>57</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271

<sup>58</sup> See pp. 2090-2105.

<sup>59</sup> See Appellate Case 2022-000758 1. 11/21/2023 Order of SCSC

**Thus, Hunt asks this court for leave pursuant to Rule 60 (b) and based on this misconduct by the Respondent that attorney Burgess be criminally prosecuted to the full extent of the law for publishing as true a false document.**

The master in equity did abuse his discretion in denying Defendant's Hunt's **5/26/2022 Motion under Rule 59: re Order filed on 5/10/2022** that was subject to a waiver of the right to object.

#### **8. EIGHTH MOTION:**

**At trial on 3/5/2024 and 5/8/2024 attorney Burgess did not make contemporaneous objections to Hunt's Motion re lack of Subject Matter Jurisdiction, etc. filed on January 16, 2024. See pp. 5001-5031<sup>60</sup> and 5142-5150<sup>61</sup>, see Transcripts, "The failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

Where the **2/5/2024 NOTICE OF HEARING** stated ... time and place for holding a hearing on all pending motions and a bench trial thus:

And a few weeks **after** the **3/5/2024 and 5/8/2024** trials on all pending motions were over attorney Burgess wrote the void<sup>62</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 8) where he ignored that **waiver applied where he had made no** contemporaneous objections to Hunt's **Motion re lack of Subject Matter Jurisdiction, etc. filed on January 16, 2024**<sup>63</sup>.

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<sup>60</sup> See pp. 5046 and pp. 5030: Motion re lack of Subject Matter Jurisdiction, etc.

<sup>61</sup> See PP. 5142-5150 for: violations, sanctions, and damages requested.

<sup>62</sup> See **pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.**

<sup>63</sup> See pp. 5030 and pp. 5046.

And the enclosed **1/16/2024-12:01 Motion** of the **Horry County Public Index** shows that on **January 16, 2024** that the **singular entry** is from Hunt. See pp. 5030, pp. 5046 & the **January 16, 2024 Horry Count Public Index, Branch Banking and Trust Company, Plaintiff, et al vs. Cindy B. Hunt, defendant, et al Case Number 2013CP2602528.**

**Attorney Burgess for BBT/SLS did not have an Eighth item in the void<sup>64</sup> 6/3/2022 Brief in Response to Defendant's Motions that he could have inserted into Defendant Hunt's eighth motion? No, he only had SIX items.**

Thus, attorney Burgess for the RESPONDANT (BBT/SLS) did write by **forging** into this matter on **6/26/2024 at 12:41** that he had filed 'motion related to subject matter jurisdiction filed **January 16, 2024**? **Yes.** See the forged and void<sup>65</sup> **6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7 at item 8; SC Code 16-13-10/ pp. 2090; and State v. Brandt, 393 S.C. 526, 540, 713 S.E.2d 591 (S.C. 2011), pp. 2078-2107.**

**Hunt asks this court for leave pursuant to Rule 60 (b) and based on this misconduct by the Respondent that attorney Burgess be criminally prosecuted to the full extent of the law for publishing as true a false document.**

As such, the master in equity did abuse his discretion in denying Defendant Hunt's **Motion re lack of Subject Matter Jurisdiction, etc. filed on January 16, 2024** that was subject to a waiver of the right to object.

9. COUNTER AFFIDAVIT: **At trial on 3/5/2024 and 5/8/2024 attorney Burgess did not** make contemporaneous objections to Hunt's **Counter Affidavit.** <sup>66</sup> See pp. 6028-6094, &

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<sup>64</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271

<sup>65</sup> See pp. 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271

<sup>66</sup> The counter affidavit contains Hunt's resume and an affidavit of attorney fees and other affidavits that satisfy the six factors of *Baron Data Systems, Inc. v. Loter*, 297 S.C. 382, 377 S.E.2d 296 (S.C. 1988). See pp. 6029-6094.

**counter affidavit and Transcripts, "The failure to make an objection at the time evidence is offered constitutes a waiver of the right to object." Doe v. S.B.M., 488 S.E.2d 878, 327 S.C. 352 (S.C. App. 1997).**

When attorney Burgess wrote the **void<sup>67</sup> 6/26/2024 Master In Equity's Order and Judgment of Foreclosure and Sale Deficiency Waived at page 2 at paragraph 7** again he ignored that waiver applied where he again had made no contemporaneous objections to Hunt's COUNTER AFFIDAVIT where Hunt had **already filed a total of eight motions (six motions and two Rule 59 motions to alter or amend the judgement) in order to preserve all of HUNT'S issues that were also contained in the COUNTER AFFIDAVIT for appellate review.**<sup>68</sup>

**Doctrine of Unclean Hands: "[BBT/SLS] came to the court with unclean hands and thus was barred from seeking equitable relief." Matrix Financial Serv. Corp. v. Frazer, 394 S.C. 134, 714 S.E.2d 532 (S.C. 2011); and see pp. 1522-1526, 6045-6046; 1984-1985, 2173-2175, 2268, 2239-2271. Attorney Burgess's 3/4/2024 AFFIDAVIT OF ATTORNEY'S FEES void/ a forgery? **Yes.**<sup>69</sup> See pp. 1984-1985, 2173-2175, 2178, 2257-2268, 2239-2271 & 6034-6039.**

Should attorney Burgess's 3/4/2024 AFFIDAVIT OF ATTORNEY'S FEES be allowed? **No.** See pp. 1984-1985, 2173-2175, 2178, 2257-2268, 2239-2271 & 6034-6039.

**Lack of Standing:** Did SLS, the assignee/substitute Plaintiff, fail to prove that SLS had STANDING on 4/16/2013 to pursue foreclosure? **YES.** See pp. 2249- 2271<sup>70</sup>, p. 264 & pp. 1879-1880 &

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<sup>67</sup> See 1984-1985, 2173-2175, 2242-2246, 2256-2268 & 2239-2271.

<sup>68</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

<sup>69</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>70</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

**pp, 6029-6094.**

**Illegality: Did BBT place at least two loans in Hunt's 2007 customer profile at BBT that did not belong to Hunt called: transfer management and portfolio? Yes. See pp. 1522-1525, 6043-6044<sup>71</sup>,,,**

**Laches: Hunt has been harmed by BBT's delay in not notifying Hunt in 2007/earlier when the two unauthorized loans were placed in Hunt's customer profile. See pp. 6059<sup>72</sup>, 1522-1526<sup>73</sup> & pp. 6044-6045<sup>74</sup>.**

Is the 6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS **void** / a forgery? **Yes.** <sup>75, 76</sup> See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.

Is attorney Burgess's 2/15/2024 BRIEF IN RESPONSE TO DEFENDANT'S AMENDED MOTION FOR A WRIT OF MANDAMUS FILED JUNE 14, 2022 void/ a forgery? **YES.**<sup>77</sup> See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.

Is attorney Burgess's 2/15/2024 BRIEF IN RESPONSE TO DEFENDANT'S JANUARY 16, 2024 MOTION **void/a forgery**? **Yes.** <sup>78</sup> See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.

Is attorney Burgess's 9/7/2023 AFFIDAVIT OF NON-MILITARY STATUS void/ a forgery? **Yes.**

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<sup>71</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

<sup>72</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

<sup>73</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

<sup>74</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

<sup>75</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>76</sup> Also included in the void 6/3/ 2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS ARE THE NAMES USED IN THE first 6 VOID PARAGRAPHS at 7 at page 2. And did Hunt object to all pages of the arguments set forth in all pages of the void 6/3/2022 BRIEF IN RESPONSE TO DEFENDANT'S MOTIONS? Yes. See pp. 4997-5000.

<sup>77</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>78</sup> See SC Code 16-13-10 and pp. 2090-2105.

<sup>79</sup> **See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.**

ARE attorney Burgess's EXHIBITS 1-9 void/ a forgery? **Yes.** <sup>80</sup> **See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.**

Is attorney Burgess's 2/15/2024 BRIEF IN RESPONSE TO DEFENDANT'S AMENDED MOTION FOR A WRIT OF MANDAMUS FILED JUNE 14, 2022 void/ a forgery? **Yes.** <sup>81</sup> **See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.**

Is attorney Burgess's 2/15/2024 BRIEF IN RESPONSE TO DEFENDANT'S JANUARY 16, 2024 MOTION void/ a forgery? **Yes.** <sup>82</sup> **See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.**

Is attorney Burgess's 3/4/2024 AFFIDAVIT OF ATTORNEY'S FEES void/ a forgery? **Yes.** <sup>83</sup> **See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.**

Is attorney Burgess's 3/4/2024 AFFIDAVIT OF ATTORNEY'S FEES at Exhibit 10 void/ a forgery? **Yes.** <sup>84</sup> **See pp. 1984-1985, 2173-2175, 2257-2268 and 2239-2271.**

The master in equity did abuse his discretion in denying Defendant's Hunt's COUNTER AFFIDAVIT that was subject to a waiver of the right to object and where Hunt had **already filed two Rule 59 motions to alter or amend the judgement in order to preserve all of HUNT'S**

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<sup>79</sup> See SC Code 16-13-10 and pp. 2090-2105.

<sup>80</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>81</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>82</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>83</sup> See SC Code 16-13-10 and pp. 2090-2105

<sup>84</sup> See SC Code 16-13-10 and pp. 2090-2105

issues that were contained in the COUNTER AFFIDAVIT for appellate review.<sup>85</sup>

**DAMAGES REQUESTED \$67, 352,147 million and cancellation of mortgage and also see fees/damages at:**

**See all pages of each Motion at pp. 1956-1973, pp. 1974<sup>86</sup>-1980, pp. 1986-2005, pp. 2006-2077, pp. 2078-2112, pp. 2113-2238, pp. 2239-2271, and pp. 5001-5032.**

**And see 11/30/2023 Amended Reply to Brief In Response to Defendant's Motions at pp. 4996-5000; and**

**See Memorandums at all pp. 5049-5059, pp. 5060-5069, pp. 5070-5077, pp. 5078-5104, pp. 5105-5121, pp. 5122-5132, pp. 5133-5141, pp. 5142-5150 and**

**See 3/5/2024 email and Counter Affidavit at all pp. 6028-6094 and**

**Based on the foregoing and any additional sustaining grounds appearing in the record, Hunt respectfully requests that the Court reverse the**

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<sup>85</sup> See Rule 59 motions at pp. 2239-2271 and pp. 2078-2110

<sup>86</sup> Abuse of Process

Master's Order entered on 6/26/2024.

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**CONCLUSION**

**Respectfully Submitted,**

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Cindy B. Hunt (SC Bar #65408)

Pro Se

195 D Willow Green Drive

Conway, SC 29526

*CB Hunt 8/14/2025*

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM Horry COUNTY

COURT OF COMMON PLEAS

JUDGE ALAN CLEMMONS, MASTER-IN-EQUITY

APPELLATE CASE NO. 2024-001119

SPECIALIZED LOAN SERVICING LLC...RESPONDENT

**RECEIVED**

V.

AUG 19 2025

SC Court of Appeals

Cindy B. Hunt; Willow Greens

Homeowners Association, Inc.;

CJ Developers, LLC.....Defendants,

Of Whom Cindy B. Hunt is .....Appellant

**Certificate of Service**

The undersigned hereby certifies that on 8/14/2025

Cindy B. Hunt served a copy of the Appellant's *Reply Brief to initial Brief of Respondent* by depositing the same in the US Mail with proper postage

upon the persons below named:

SCCA: MS. J. Kitchens, PO Box 11629 Col. SC 29211

Attorneys C. Burgess & B. Dangerfield

Brock & Scott, PLLC

3800 Fernandina Rd. Suite 110

Columbia SC 29210

DATED: 8/14/2025

From: CINDY B. HUNT, SC BAR# 65408

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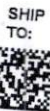
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Unit D 195 Willow Green Dr  
Conway, SC 29526

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