

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON	)	NINTH JUDICIAL CIRCUIT
	)	CASE NO.: 2025-CP-10-1379
	)	
	)	
	)	RAVENEL MAGISTRATES COURT
HILL FAMILY TRUST 2008 of ARIZONA,	)	CASE NO: 2025CV1011200030
and YVONNE HEROLD	)	
Plaintiffs,	)	NOTICE OF MOTION and
	)	MOTION TO RECONSIDER
	)	ORDER AFFIRMING
TERESA HILL,	)	MAGISTRATE'S COURT
	)	EVICITION ORDER
Defendant.	)	
_____	)	

**TO: THE ABOVE-NAMED PLAINTIFFS, HILL FAMILY TRUST 2008 of ARIZONA and YVONNE HEROLD**

YOU WILL PLEASE TAKE NOTICE that Defendant, Teresa Hill, will move before the presiding Judge of the Charleston County Court Common Pleas, Charleston, South Carolina, 100 Broad Street, Charleston, South Carolina, 29401, as counsel may be heard, on a motion to reconsider order this court's order affirming the eviction order of Ravenel Magistrates and for an order granting the relief hereinafter set forth.

Defendant, Teresa Hill ("Defendant" or "Teresa Hill"), pro se attorney, and respectfully moves this Honorable Court, pursuant to Rule 59(e) of the South Carolina Rules of Civil Procedure, to reconsider its order issued after the June 26, 2025, virtual hearing, affirming the eviction order issued by Charleston County Ravenel Magistrate Sheryl Perry. In support of this motion, Defendant Teresa Hill states as follows:

**GROUND FOR RECONSIDERATION**

**1. LACK OF STANDING OF PLAINTIFF HILL FAMILY TRUST 2008 OF ARIZONA**

- a) Plaintiff, Hill Family Trust 2008 of Arizona ("Plaintiff" or "Trust"), has failed to produce any trust document establishing the existence of Hill Family Trust of Arizona or naming Plaintiff, Yvonne Herold as Trustee.

- b) No trust document was provided by either Plaintiff Hill Family Trust 2008 of Arizona or Yvonne Herold to the Charleston County Ravenel Magistrate Court, the Charleston County Court of Common Pleas, or recorded with the Charleston County Register of Deeds.
- c) The alleged beneficiaries of the Hill Family Trust 2008 of Arizona have not received any trust document, and no such document has been served or filed in these proceedings.
- d) Without evidence of a valid trust, Plaintiff Hill Family Trust 2008 of Arizona lacks standing to bring this eviction action, and the alleged Trustee, Yvonne Herold, lacks authority to act on behalf of the Trust.
- e) The absence of a trust document constitutes a fundamental defect in Plaintiffs' case, warranting reconsideration to correct errors of law and prevent manifest injustice under Rule 59(e), SCRPC and dismissal of the action by the undocumented trust.

## **2. DEFENDANT'S OWNERSHIP INTEREST AND NON-TENANT STATUS**

- a) Defendant, Teresa Hill, is an attorney who, 35 years ago, built and has continuously maintained an ownership interest in the property located at 6209 Savannah Highway, Ravenel, South Carolina, where she practices law and resides.
- b) Defendant, Teresa Hill, has never been a tenant of Hill Family Trust of Arizona or any other person or entity claiming an interest in 6209 Savannah Highway, Ravenel, South Carolina.
- c) Defendant Teresa Hill has never been a tenant of Plaintiff Yvonne Herold or any other entity or individual claiming an interest in 6209 Savannah Highway, Ravenel, South Carolina.
- d) Defendant Teresa Hill moved into the building to work and live on the day she and her law partners completed construction on 6209 Savannah Highway. When

she entered the building 35 years ago it was with the key she entered the building 35 years ago. Teresa Hill has remained there for 35 years without ever entering into a landlord-tenant relationship. She went to the bank to secure the funds when funds were borrowed to pay for the building. She selected the design of the building. The law building is a replica of a building in Mississippi. This building was an investment property Teresa Hill and her law partners. All payments for the building were made from income generated by the law firm Hill, Hill, & Hill and Hill & Hill. In 1990 an agreement was entered into which would transfer 6209 Savannah Highway and the law firm to Teresa Hill and Tommy Hill in the year 2000. Tommy Hill is the same G. Thomas Hill who alleged prepared and notarized a deed which Hill Family Trust 2008 of Arizona and Yvonne Herold (Tommy's Sister) seek to use to evict Teresa Hill from her property at 6209 Savannah Highway.

- e) The eviction proceedings are improperly predicated on a landlord-tenant relationship that does not exist, rendering the eviction order legally erroneous.

### **3. LACK OF DUE PROCESS**

- a) Defendant Teresa Hill was not served with any pleadings related to the eviction action, case number 2025-CV-10-11200030 by the Ravenel Constable, a private process server, or certified mail.
- b) Defendant Teresa Hill was not afforded an opportunity to be heard prior to Charleston County Sheriff's Deputies and the Ravenel Constable forcibly entering her property at 6209 Savannah Highway, causing harm to Defendant.
- c) The failure to provide proper service and an opportunity to be heard violates Defendant's due process rights under the United States Constitution, Amend. XIV, and the South Carolina Constitution, Art. I, § 3. (requiring notice and opportunity to be heard).
- d) These constitutional violations warrant reconsideration to correct fundamental errors in the eviction process.

#### **4. PROCEDURAL IRREGULARITIES IN THE APPELLATE PROCESS**

- a) When Defendant Teresa Hill attempted to file this appeal with the South Carolina Courts e-filing system, a system which the Defendant is very familiar with, South Carolina Courts e-filing system which would not accept her e-filing. As the court is aware there is a very short window of time, five (5) days, in which to file an eviction appeal. Defendant Teresa Hill call the ASI filing help line. They were not able to correct the problem. Defendant Teresa Hill called the Charleston County Clerk of Court's office; they were not able to accept a hard copy filing or help. Defendant had to involve the South Carolina Supreme Court. The defendant was directed to make a report of the filing failure and send it to Charleston County at the contact information location designated by Charleston County on the South Carolina Supreme Court website. Charleston County initially agreed to accept an email copy of the appeal. Then Charleston County reversed its decision. Defendant, being a 45-minute drive in good traffic from the courthouse, began driving her appeal. In route to the courthouse, she was calling the Supreme Court and the Charleston County Clerks office about the injustice of an appeal being refused by all court systems and offices on an eviction that was never served on a property owner. As Defendant approached downtown Charleston near the end of the day the Charleston County Clerk's office agreed to accept a hard copy filing of her appeal in case 2025CV1011200030. The appeal was filed by Teresa Hill on March 13, 2025, at 4:12 p.m. at the Charleston County Courthouse.
- b) On March 13, 2025, Defendant Teresa Hill requested the Magistrate's Return from Charleston County Ravenel Magistrate Sheryl Perry's office by two (2) methods via facsimile and United States First Class Mail on March 13, 2025.
- c) One March 14, 2025, when the three Charleston County Deputies and Ravenel Constable forced their way into Teresa Hill's office. They denied knowing of the appeal Defendant Teresa Hill filed. Teresa Hill provided the Charleston County Deputies and the Ravenel Constable with a copy of the filed appeal and a copy of the correspondence sent to Charleston County Magistrate Sheryl M. Perry. She asked them not to come into her office. They did not respect her request. They also left three Charleston County Sheriff's cruisers in her law office parking lot

with blue lights flashing. The deputies and the constable still forced their way into her office three huge Charleston County Sheriff's deputies cornering her and causing harm to her. As one of the Charleston County Deputies stated in another hearing to a Charleston County Judge, *"She was somehow able to get off an appeal."*

- d) Charleston County Constable Cassie Watson was aware from the day he and the Charleston County Deputies came to evict her on March 14, 2025, that she was never served with any of the pleading in this case before they forced their way into Defendant Teresa Hill's office. Even after the deputies received the stamped filed, dated, and clocked copy of the eviction appeal they still forced their way into her business – more than once on March 14, 2025.
- e) Despite multiple inquiries by Teresa Hill to the Charleston County Clerk of Court's office regarding the Magistrate's Return of Sheryl Perry, Defendant Teresa Hill did not receive the Magistrate's Return until the day of the appellate hearing, shortly before the appellate hearing on June 26, 2025, when the Magistrates Return was made available online.
- f) The Charleston County Magistrate's Return was not filed until June 25, 2025, one day before the appellate hearing, depriving Defendant of adequate time to prepare for the appeal. Although it is stamped filed on June 25, 2025, the return was not available to Plaintiff until June 26, 2025, the date of the appellate hearing.
- g) Plaintiffs' attorneys, Steven Slotchiever and Anna Richter, did not file a Notice of Appearance in the Charleston County Court of Common Pleas appeal case, until the day of the appellate hearing, June 26, 2025, further limiting Defendant's ability to prepare. Defendant Teresa is unaware as to whether they ever filed a notice of appearance in the Magistrates Court Case. A notice of appearance is not listed in Charleston County Magistrate Sheryl Perry's return.
- h) Defendant Teresa Hill, a self-represented attorney, did not receive email notifications from the Charleston County Court of Common Pleas regarding filings in this case, despite initiating the appeal and being entitled to such notifications under Rule 5, SCRCP. At all times her email address was available

to the Charleston County Clerks office, listed in the e-filing system and listed in the pleadings along with her South Carolina Bar number and contact information.

- i) These procedural deficiencies prejudiced Defendant's ability to effectively present her appeal, warranting reconsideration.
- j) Defendant Teresa learned of the Court's order affirming the eviction only on July 28, 2025, via the Charleston County Court of Common Pleas online portal. No email notification of the filing was received.
- k) The lack of direct notification via email to Defendant (attorney) who initiated the appeal and whose email was not only provided but was in the system further underscores the highly unusual number of procedural irregularities in this case jeopardizing due process.

#### **5. ALLEGATION OF FRAUD IN THE DEED**

- a) The alleged deed placing the property at 6209 Savannah Highway into the Hill Family Trust 2008 of Arizona which present by the alleged Trustee Yvone Herold at the appeal and relied upon by Plaintiff, was purportedly signed in 2008, was not filed with the Charleston County Register of Deeds until 2023.
- b) The fifteen (15) year delay in filing the deed raises serious concerns about its authenticity and validity, suggesting potential fraud, misrepresentation, capacity of the signers and witnesses, and undue influence by Plaintiff or its agents.
- c) The alleged deed transferring the property to a trust was not filed until one of the alleged signers was dead and the other alleged signer was severely incapacitated with Alzheimer disease.

- d) The failure to timely file the alleged deed deprived Defendant Teresa Hill of notice of any claimed transfer of property interest, undermining the legitimacy of Plaintiffs' claim to ownership and its basis for initiating eviction proceedings.
- e) This apparent fraud, undue influence, capacity of the signor constitutes a material defect in Plaintiffs' case, further warranting reconsideration of the Court's order affirming the eviction.
- f) The Plaintiffs' actions in presenting a potentially fraudulent deed constitute a deliberate misrepresentation of material facts, relied upon by the Court in affirming the eviction order, which the Defendant seeks to challenge.

## **6. EQUITABLE ESTOPPEL**

- a) Defendant relied on representations and conduct by business partners, law partners, Plaintiffs, Plaintiffs predecessors, its agents, or related non-parties, including business partners and law firms, that affirmed her ownership interest and right to occupy the property at 6209 Savannah Highway, Ravenel, South Carolina.
- b) Over the course of 35 years, Plaintiffs or its predecessors, business partners, law partners, Plaintiffs, Plaintiffs predecessors, its agents, or related non-parties, including business partners and law firms, knowingly permitted Defendant to maintain her residence and law practice on the property knowing that she believed that she was an owner without asserting any claim of a landlord-tenant relationship or challenging her ownership interest. Plaintiffs or their predecessors continued to have Defendant work to pay for a property as agreed upon.
- c) Defendant reasonably relied on these and many other representations and Plaintiffs', business partners, law partners, Plaintiffs, Plaintiffs predecessors, its agents, or related non-parties, including business partners and law firms, inaction to her detriment, substantial monetary investment, investing significant

time, resources, and effort into paying for, maintaining and improving the property under the belief that her ownership interest was secure.

- d) Plaintiffs are equitably estopped from now asserting a landlord-tenant relationship or pursuing eviction, as such action contradicts the prior representations and conduct upon which Defendant relied to her detriment.
- e) Allowing the subject eviction would result in manifest injustice, warranting reconsideration under Rule 59(e), SCRCP and dismissal of the eviction.

**7. RELIANCE ON AGREEMENTS WITH NON-PARTY BUSINESS PARTNERS AND LAW FIRMS WHO WERE NOT NAMED IN THIS LAWSUIT**

- a) Defendant Teresa Hill entered into agreements with business partners and law firms, who are not parties to this action, one of which allegedly drafted the deed transferring the property into the alleged Trust which was signed by the other law partner. Hill and Hill, LLC and Hill, Hill and Hill, LLC are proper parties to this action and have not been noticed or served. Hill, Hill and Hill, LLC and Hill and Hill, LLC have potential ownership interest and use interest along with Teresa Hill who was a partner in both of those law firms. The ownership interest in and use of the property at 6209 Savannah Highway, Ravenel, South Carolina properly involves Teresa Hill, Hill, Hill, and Hill and Hill and Hill and other potential heirs.
- b) Defendant Teresa Hill relied on representations made by these business partners and law firms in maintaining her ownership interest and continued use of the property for her law practice and residence since 1990.
- c) The eviction action fails to account for these potential ownership interest in the building and real property, agreements, representations and fails to name all interested parties to the action which should receive notice of this litigation which establish Defendant's equitable rights to the property and ownership interest. This is not a case involving a tenant. This is not an eviction case, this is a real property title dispute. Defendant Teresa Hill claims ownership of the property. Never has she ever entered into a rental agreement. Never has she ever been given permission to occupy the property because she is an owner.

- d) These equitable considerations, including Defendant's detrimental reliance on the representations of non-parties, warrant review in a court of equity to prevent manifest injustice.

#### **8. FAILURE TO NOTIFY ALL PROPER PARTIES, BENEFICIARIES, AND ESTATES**

- a) Plaintiff not only failed to provide notice of the legal pleadings and action to Defendant Teresa Hill, but Plaintiff also failed to properly name and serve prior law firms that represented or had agreements with Defendant concerning the property at 6209 Savannah Highway, Ravenel, South Carolina, despite their potential interest in the property or related agreements.
- b) The alleged beneficiaries, of the Hill Family Trust 2008 of Arizona, have never been notified of the existence of a trust or properly notified of this action, nor have the trust beneficiaries ever been provided with any trust documentation, further undermining the legitimacy of Plaintiffs' claims and the eviction proceedings. If there is a Trust the alleged Trustee has breached her fiduciary duties to the alleged beneficiaries by failing to provide the beneficiaries notification of the alleged trust.
- c) There are also certain estates, with potential interests in the property, which estate(s) should have been named as parties to this action due to their involvement in the chain of title or related agreements, were not included or notified, rendering the eviction proceedings defective.
- d) The omission of these beneficiaries and proper notice constitutes a procedural and substantive defect, as their absence prevents a complete and equitable resolution of the dispute.

#### **9. OWNERSHIP INTEREST OF PRIOR LAW FIRMS**

- a) In the alternative, prior law firms, specifically Hill, Hill & Hill and Hill & Hill that entered into agreements with Defendant Teresa Hill regarding the property

at 6209 Savannah Highway, Ravenel, South Carolina, hold an ownership interest in the property based on those agreements.

- b) These law firms, as non-parties to the eviction action, were not notified of the proceedings, despite their potential ownership interests, which further invalidates the eviction process.
- c) The failure to include these law firms as necessary parties with potential ownership interests constitutes a procedural defect and a violation of due process.

#### **10. CONSTRUCTIVE TRUST INTEREST AND UNJUST ENRICHMENT**

- a) In the alternative, if Defendant Teresa Hill is not deemed an owner of the property at 6209 Savannah Highway, Ravenel, South Carolina, she holds a constructive trust interest in the property due to her significant contributions and 35-year reliance on representations regarding her rights to the property.
- b) Over the course of 35 years, Defendant invested substantial time, money, and effort into building, maintaining, and improving the property, including constructing the building, maintaining it as her residence and law practice, and making ongoing improvements, all under the reasonable belief, based on representations by non-parties and Plaintiffs' predecessors, that she held a secure interest in the property.
- c) Allowing Plaintiffs to evict Defendant and claim full ownership of the property, while retaining the benefit of Defendant's extensive contributions without compensation, would result in unjust enrichment to Plaintiffs at Defendant's expense.
- d) Plaintiffs' attempt to leverage an allegedly fraudulent deed, filed 15 years after its purported execution, to dispossess Defendant of her office/home and livelihood constitutes an egregious inequity. Defendant's contributions, including her financial investment, labor, and 35 years of continuous occupancy, have

significantly enhanced the value of the property, and Plaintiff would be unjustly enriched by retaining these benefits without acknowledging Defendant's equitable interest. The building and law practice the nonlawyers are attempting to sale would not even exist without the 35 years of work and investment of Teresa Hill.

- e) A constructive trust must be imposed to prevent this unjust enrichment, recognizing Defendant's equitable interest in the property and ensuring that Plaintiffs do not profit from Defendant's 35 years of contributions while disregarding her rights. The imposition of a constructive trust is necessary to prevent manifest injustice, as it would be unconscionable to allow Plaintiff to reap the benefits of Defendant's decades-long investment in the property while evicting her based on a questionable trusts claim to ownership by a deed filed when one of the signers was dead and the other signer was severely incapacitated.

#### **11. AGREEMENT AND EQUITABLE TRUST DUE TO FRAUDULENT TRANSFER**

- a) Defendant entered into an agreement with business partners and law firms, under which she fulfilled her obligations, including building, paying for, contributing to and maintaining the property at 6209 Savannah Highway, Ravenel, South Carolina, for 35 years as an office, residence, and law practice.
- b) Plaintiffs, its agents, or predecessors failed to inform the Defendant of the alleged fraudulent transfer of the property, as evidenced by the 15-year delay in filing the 2008 deed with the Charleston County Register of Deeds.
- c) By not disclosing the purported transfer, Plaintiffs or its predecessors breached their duty to Defendant, who relied on the agreement and representations to her detriment, believing her interest in the property was secure.
- d) This breach and the fraudulent concealment of the transfer establish an equitable trust for Defendant's benefit, as it would be unconscionable to allow Plaintiff to evict her and deprive her of her interest in the property due to their misconduct.

- e) The equitable trust arises from Plaintiffs' failure to notify Defendant of the alleged transfer, which prevented her from taking action to protect her interest, further supporting the imposition of an equitable trust to safeguard Defendant's rights.

**12. UNJUST ENRICHMENT THROUGH PLAINTIFFS' INEQUITABLE CONDUCT**

- a) Plaintiffs' pursuit of eviction based on a potentially fraudulent deed, coupled with its failure to acknowledge Defendant's 35 years of contributions to the property, law firm and business constitutes a clear case of unjust enrichment.
- b) Defendant's substantial investments in the property, including her financial and personal contributions to its construction, forgoing substantial income, ongoing maintenance, and improvements, have directly benefited Plaintiff or its fraudulent predecessors, who now seek to retain these benefits without compensating Defendant or recognizing her equitable interest.
- a) Defendant lived in the attic of the office building for more than 10 years so that financial sacrifices and work contributions could be made to support the building of this office building. As evidence of the time in the attic of the building, the children's growth charts and names are etched upon the walls. The children's crayon drawings are on the walls. The hallway of the office was used as a hockey and batting cage. The children all toddled around this office while Defendant worked. They all honed their business and legal skills working on computers and greeting clients while Momma worked. The contributions, forgoing bonuses, extra coverage, more complex cases, and many sacrifices beyond the monetary realm were part of the agreement in paying that was only to last for a specified period of time which has been far exceeded by Defendant Teresa Hill. All four of her children were brought home from the hospital to 6209 Savannah Highway; those children are now all over the age of 30 years of age. Those children who were raised in the attic of their mother's law building. They were raised there as part of an agreement of contribution and sacrifice made for ownership in the law business and law building. *Now Hill Family Trust 2008 of*

Arizona seeks to not only sell Teresa Hill's building but are by selling the building also selling her law practice of 35 years.

- c) For 35 years, Plaintiff or its predecessors acquiesced to Defendant's occupancy and improvements, never asserting a landlord-tenant relationship or challenging her claimed ownership interest. Defendant Teresa Hill has never been a tenant she has always acted with ownership authority. This prolonged acquiescence, followed by an attempt to evict her based on a fraudulent deed presented during incapacity and during undue influence, represents an attempt to unjustly enrich Plaintiff Hill Family Trust 2008 of Arizona by exploiting Defendant's 35 years contributions.
- d) The alleged fraudulent deed, filed seventeen (17) years after its purported execution, further exacerbates the inequity, as Plaintiff seeks to profit from a potentially invalid transfer while ignoring Defendant's detrimental reliance on representations that her interest in the property was secure. *S.C. Code Ann. § 30-7-10.e.* Permitting Plaintiff to evict Defendant Teresa Hill, a non-tenant property owner, without addressing her contributions and the fraudulent circumstances surrounding the deed would reward Plaintiff Hill Family Trust 2008 of Arizona's inequitable conduct and unjustly deprive Defendant Teresa Hill of her home, livelihood, and the value she added to the property over three and a half decades.
- e) This Court must intervene to prevent such unjust enrichment, either by imposing a constructive or equitable trust or by dismissing the action on the eviction to ensure that Plaintiff Hill Family Trust 2008 of Arizona does not benefit at Defendant's expense, thereby correcting a manifest injustice.

### 13. ADVERSE POSSESSION

a) In the alternative, Defendant has acquired title to the property at 6209 Savannah Highway, Ravenel, South Carolina, through adverse possession under South Carolina law.

- b) Defendant has openly, notoriously, continuously, exclusively, and adversely possessed the property for 35 years, exceeding the agreed upon period between the business partners and then the statutory period of 10 years required for adverse possession.
- c) Defendant's possession began when she moved into the property upon completion of its construction 35 years ago, openly using it as a place of business, her residence and law practice without permission from any alleged owner, including Plaintiff or its predecessors.
- d) Defendant Teresa Hill's possession of the building has been hostile, as she claimed ownership interest in the property and made substantial improvements, including constructing the building and maintaining it, without acknowledging any superior title in Plaintiff or its predecessors.
- e) Plaintiffs or its predecessors failed to assert any claim to the property or challenge Defendant's possession for 35 years, allowing her to maintain exclusive control and make significant investments in the property, further supporting her adverse possession claim.
- f) The alleged deed, filed in 2023 and purportedly signed in 2008, does not defeat Defendant's adverse possession claim, as her possession predates the alleged transfer and continued openly and notoriously thereafter, without interruption or challenge from Plaintiff or its predecessors.
- g) Defendant's adverse possession establishes her legal title to the property, rendering the eviction action invalid and warranting reconsideration of the Court's order affirming the eviction.

#### **14. MAJISTRATES COURTS LACK OF JURISDICTION**

- a) The Charleston County Ravenel Magistrate Court lacked jurisdiction over this eviction action because it was improperly initiated under the South Carolina Landlord and Tenant Act which governs disputes between landlords and tenants.
- b) Defendant is neither now nor has she ever been a tenant of Hill Family Trust 2008 of Arizona or any other person or entity, as she has maintained an ownership interest in the property at 6209 Savannah Highway, Ravenel, South Carolina, for 35 years, having built and occupied the property as her business asset without a rental agreement.
- c) The absence of a landlord-tenant relationship deprives the magistrate court of jurisdiction, as its authority in eviction actions is limited to cases involving tenants. Defendant is not a tenant. She has never been a tenant.
- d) The magistrate court lacked jurisdiction to determine title to real property or legal interests in real estate, as this case involves a dispute over Defendant's claimed ownership interest, adverse possession, and equitable interests, which are matters reserved for courts of general jurisdiction, such as the Court of Common Pleas.
- e) Additionally, the matter in controversy exceeds the magistrate court's jurisdictional limit of \$7,500, as the value of the property at 6209 Savannah Highway, Ravenel, South Carolina, and the equitable interests at stake, including Defendant's 35 years of contributions, far surpass this threshold.
- f) The magistrate court's assumption of jurisdiction over this matter, despite the lack of a landlord-tenant relationship, the need to determine title and legal interests in real property, and the amount in controversy exceeding \$7,500, constitutes a fundamental error of law, rendering the eviction order void and necessitating reconsideration under Rule 59(e), SCRCP, to correct this jurisdictional defect.

### LEGAL STANDARD

Under Rule 59(e), SCRCP, a motion to alter or amend a judgment may be granted to correct errors of law, prevent manifest injustice, or address newly discovered evidence. The grounds outlined above, supported by South Carolina case law and statutes, demonstrate clear errors of law, violations of due process, procedural irregularities, potential fraud, and equitable considerations that prejudiced Defendant's rights and the rights of others and warrant reconsideration of the Court's order.

### PRAYER FOR RELIEF

WHEREFORE, Defendant Teresa Hill respectfully requests that this Honorable Court:

1. Grant this Motion to Reconsider pursuant to Rule 59(e), SCRCP;
2. Vacate the order issued on or about June 26, 2025, affirming the eviction order;
3. Dismiss the eviction action for lack of standing, lack of jurisdiction, improper predicate, due process violations, fraud in the deed, equitable estoppel, failure to join necessary parties, ownership interests of prior law firms, constructive trust, equitable trust, unjust enrichment, adverse possession, and/or equitable considerations.
4. In the alternative, remand the case to the Charleston County the Master in Equity for further proceedings consistent with due process, proper documentation, investigation of the alleged fraud, inclusion of all necessary parties, and consideration of Defendant's equitable claims, including constructive and equitable trust interests and adverse possession, in a court of equity for further determination.

S/ *Teresa Hill*

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Charleston Common Pleas

**Case Caption:** Teresa Zachry Hill VS Hill Family Trust 2008 of Arizona

**Case Number:** 2025CP1001379

**Type:** Motion/Alter and/or Amend

AND THIS ORDER IS RESPECTFULLY  
DENIED.

s/Maite Murphy 2166