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SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

Appellate Case No. 2025-001183

LaSheila Green, Appellant,

v.

Genevieve Farmer, Jacqueline King, and Ruth Richburg, Respondents

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RESPONDENTS' REPLY IN OPPOSITION TO APPELLANT'S MOTION  
FOR RECONSIDERATION OF WRIT OF SUPERSEDEAS

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Respondents, by and through undersigned counsel, respectfully oppose Appellant's Motion for Reconsideration of the denial of her Petition for Writ of Supersedeas.

**I. Procedural Posture**

1. On July 1, 2025, the Court of Common Pleas entered an Order granting Respondents' Motion for Injunction and Ejectment.
2. On August 28, 2025, Appellant filed a Petition for Supersedeas, later amended on August 29, 2025.
3. By Order dated August 29, 2025, this Court denied Supersedeas.
4. Appellant now seeks reconsideration under Rules 221 and/or 240, SCACR.

**II. Argument**

**A. Bond Default Bars Relief.**

5. As a condition of remaining in possession pending appeal, Appellant was required to make monthly bond payments into the court.
6. Appellant has failed to pay the bond for June, July, and August 2025.
7. A party in default of a lawful bond order cannot obtain Supersedeas, nor can she seek reconsideration after failing to comply with the very conditions meant to preserve the status quo. Equity does not aid those who disregard court orders.

**B. Appellant's Underlying Claim Is Legally Barred.**

8. Appellant continues to rely on "adverse possession." South Carolina law expressly abolished adverse possession effective January 1, 2017: *S.C. Code Ann. § 15-67-280*.
9. Even if adverse possession remained viable, Appellant has never assumed the obligations of ownership, such as paying property taxes or homeowner's insurance — obligations Respondents have continuously met. See *Lyles v. Fellers*, 138 S.C. 52, 135 S.E. 623 (1926).

**C. The Property Is Condemned and Unsafe.**

10. The Town of Kingstree issued a condemnation notice declaring the subject property unfit for human habitation.

11. Appellant's continued occupancy cannot be considered preservation of the "status quo" it endangers public health and safety and undermines the rule of law.

**D. No Grounds for Reconsideration Exist.**

12. Rule 221, SCACR, allows reconsideration only if the Court overlooked or misapprehended a material matter of law or fact. Appellant presents no new law, fact, or evidence — only recycled arguments.

13. Rule 240, SCACR, does not provide an independent ground to alter this Court's denial of Supersedeas.

**III. Conclusion**

Appellant has failed to show any basis for reconsideration. She remains in default of her bond obligations for June, July, and August 2025, relies on a claim (adverse possession) barred by statute, and occupies condemned property without bearing ownership obligations.

**WHEREFORE, Respondents respectfully request that this Honorable Court DENY Appellant's Motion for Reconsideration of the denial of her Petition for Writ of Supersedeas and grant such other relief as the Court deems just and proper.**

Respectfully submitted,

Dated this 5th day of September 2025.



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