

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas

William Tindal, Special Referee

Appellate Case No. **2025-002111**

BOKF, N.A.,

Respondent

v.

Joshua-William: Ovalle, BENE,

Appellant

**RECEIVED**  
**Nov 25 2025**  
**SC Court of Appeals**

**REPLY TO RESPONDENT'S RETURN**


COMES NOW the Appellant and respectfully submits this limited Reply to clarify the procedural posture of His supersedeas request.

1. On November 03, 2025, Appellant transmitted his *Emergency Petition in Equity for Stay Pending Appeal*, Proposed Order, and Certificate of Service to the Special Referee, who acknowledged receipt and directed Respondent's counsel to respond. On November 24, 2025, the Special Referee likewise confirmed receipt of the full supersedeas packet mailed by Appellant, including the *Petition in Equity for Approval of Supersedeas Security, Supersedeas Bond*, and accompanying documents.
2. Although these materials were submitted to the Special Referee in good faith, they were not yet formally docketed with the clerk of the lower court. Acting promptly to correct this and to ensure the matter is properly before the lower court, Appellant will file the

complete supersedeas packet in person with the Lancaster County Clerk of Court on November 26, 2025, thereby curing the procedural defect. Clerk-stamped copies will be provided to this Court upon receipt.

3. With that filing, Appellant's supersedeas application will be fully and properly before the lower court. Appellant provides this clarification so the Court may evaluate the matter on an accurate procedural record. Appellant will continue seeking relief in the lower court unless and until this Court determines intervention is warranted.
4. Appellant notes only that the foreclosure sale is set for December 1, 2025, and the property would be irreversibly lost if a ruling on the supersedeas request does not occur in time. Equity permits correction, honors intent over form, and acts to prevent irreparable harm where rigid procedure would work an injustice.

Respectfully submitted in good faith this 25<sup>th</sup> day of November 2025.

  
\_\_\_\_\_, LS  
Joshua-William: Ovalle, *In Propria Persona, Sui Juris*  
c/o: 8866 Ross Hill Road  
Fort Mill, SC 29707  
as Implied Surety/Heir/Beneficiary of  
JOSHUA WILLIAM OVALLE, Principal Debtor  
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## CERTIFICATE OF SERVICE

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I affirm that I have served the Reply to Respondent's Return via electronically filing with the SOUTH CAROLINA COURT OF APPEALS (ctappfilings@sccourts.org), and by mailing a copy to each subsequent party via USPS certified mail. A copy served on:

- BOKF, N.A., addressed to its Attorneys of record, Kevin Brown / Brook Dangerfield / Chad Burgess, 3800 Fernandina Road, Suite 110, Columbia, South Carolina 29210 (9589 0710 5270 2660 7031 37)
- William C. Tindal, Special Referee, 961 North Main Street #117, Lancaster, South Carolina 29720 (9589 0710 5270 2660 7031 44)

November 25, 2025

 , LS

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