

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
Appellate Case No.: 2025-002267

Appeal From the Court of Common Pleas
Kershaw County
Judge William Cox, Jr., Master-in-Equity
Case No.: 2025-CP-28-00383

RECEIVED
Nov 25 2025
SC Court of Appeals

Ex Parte: Laura Bowen, Appellant,

In re:

GITSIT Solutions, LLC, not in its individual capacity but solely in its capacity as separate Trustee of GITSIT Mortgage Loan Trust BBPLC1,
Respondent,

v.

Calvin Theodore Bowen, Jr., individually and as Personal Representative of the Estate of Calvin T. Bowen, Sr. a/k/a Calvin Theodore Bowen, Sr.; Ronald J. Bowen, and any other Heirs-at-Law or Devisees of Calvin T. Bowen, Sr. a/k/a Calvin Theodore Bowen, Sr., Deceased, their Heirs, Personal Representatives, Administrators, Successors and Assigns, and all other persons entitled to claim through them; all unknown persons with any right, title or interest in the real estate described herein; also any persons who may be in the military service of the United States of America, being a class designated as John Doe; and any unknown minors or persons under a disability being a class designated as Richard Roe; Ascension Point Recovery Services, LLC; Bank of America, N.A.; Safe Federal Credit Union; and Kershaw County EMS, Defendants.

APPELLANT'S EMERGENCY PETITION FOR SUPERSEDEAS
TO STAY FORECLOSURE SALE SCHEDULED FOR DECEMBER 1,
2025

Appellant respectfully petitions this Court pursuant to Rule 241 and Rule 8, SCACR, for issuance of supersedeas and an emergency stay of the Master-in-Equity foreclosure sale currently scheduled for December 1, 2025 to prevent irreparable harm and avoid the appeal being rendered moot.

1. The Court of Appeals denied Appellant's prior Motion to Stay.
2. Appellant filed a timely Motion to Reconsider that denial on November 21, 2025, which remains pending.
3. If the sale proceeds, the appeal will be rendered moot as title will transfer and meaningful appellate review will be lost.
4. The underlying foreclosure hearing was affidavit-only, and the Clerk of Court has confirmed that no transcript or audio exists.
5. The foreclosure judgment was entered while the estate had no Personal Representative, raising jurisdictional concerns.
6. The Satisfaction of Mortgage and the two Assignments of Mortgage, all recorded two months prior to the foreclosure, reference different loan numbers and therefore do not correspond to the loan identified in the foreclosure judgment - an issue already raised in the Motion for Reconsideration, raising substantial questions as to whether any enforceable debt remained and directly relevant to whether the foreclosure judgment is void, further supporting the need for an emergency stay to avoid irreparable harm and mootness.
7. The Order of Foreclosure states that any appeal lies directly to this Court, demonstrating that appellate review was contemplated and reinforcing the

need to preserve the subject property during review.

8. Loss of real property constitutes irreparable harm under South Carolina Law.

9. No deficiency judgment has been sought or preserved, and both the Judgment of Foreclosure and Notice of Sale expressly state that deficiency is waived, meaning Respondent suffers no monetary prejudice from maintaining the status quo, further supporting issuance of a temporary stay pending appeal. The waiver of deficiency further confirms that Respondent has no continuing financial interest requiring immediate sale.

WHEREFORE, Appellant respectfully requests:

- (a) immediate issuance of a temporary stay of the foreclosure sale scheduled for December 1, 2025;
- (b) issuance of supersedeas staying enforcement of the foreclosure judgment pending appeal; and
- (c) waiver of any bond requirement.

Respectfully submitted this 25 day of November 2025.



Laura Bowen

Appellant, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing APPELLANT’S EMERGENCY PETITION FOR SUPERSEDEAS TO STAY FORECLOSURE SALE SCHEDULED FOR DECEMBER 1, 2025 upon counsel for Respondent by electronic mail, pursuant to Rule 241 and Rule 8, SCACR.

Service was made on November 25, 2025 by sending a copy via email to the following counsel of record:

Heidi B. Carey, Esquire
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Riley Pope & Laney, LLC
[Their mailing address]

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Respectfully submitted this 25 day of November 2025.



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