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IN THE SOUTH CAROLINA COURT OF APPEALS **Jan 20 2026**

Appellant Reply to Response to Motion for Stay

**SC Court of Appeals**

Appellant Aaron Quinzy, appearing pro se, respectfully submits this Reply to Respondents' Response to Motion for Stay. Respondents' filing contains material misstatements of fact, omits critical portions of the record, and fails to account for the equitable and constitutional errors that occurred in the proceedings below.

First, Respondents incorrectly assert that Appellant ceased making payments for nearly two years. The record demonstrates Appellant made consistent monthly payments for approximately ten years under the lease-to-own agreement. Any alleged mortgage delinquency exists solely because Respondents failed to apply Appellant's payments toward the mortgage principal and instead misapplied or withheld funds.

Second, the Master-in-Equity improperly dismissed Appellant's Answer and Counterclaims as 'late' without reviewing the filing dates. This was a factual error. Appellant timely filed his pleadings, yet the court accepted Respondents' counsel's assertion without verification. This deprived Appellant of due process and constitutes reversible error.

Third, enforcement of the Order during pendency of appeal would render the appeal moot. Forced transfer of possession and cancellation of the contract would irreparably harm Appellant by destroying his equitable interest, improvements, and long-standing possessory rights.

Fourth, Appellant was prejudiced by unequal treatment as a self-represented litigant. The Master relied exclusively on counsel's representations and failed to evaluate documentary evidence submitted by Appellant. This violates fundamental fairness and equity principles.

Finally, Respondents benefited from insurance proceeds following two fires but directed Appellant to perform repairs under false pretenses. Those funds were not applied to restoration or debt reduction. Respondents now seek to penalize Appellant for their own misconduct.

For these reasons, Appellant respectfully requests the Court grant a stay of enforcement pending final resolution of this appeal.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I served a true and correct copy of the foregoing Appellant Reply to Response to Motion for Stay upon Respondents' counsel by email and by U.S. Mail.

Stephanie Weissenstein, Esq. Dial Grimm Rupert, LLC 121 Executive Center Dr., Ste. 218  
Columbia, SC 29210

Date: \_\_\_\_\_

Respectfully submitted,

Aaron Quinzy Appellant, Pro Se