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Feb 09 2026

S.C. SUPREME COURT

United States Bankruptcy Court

District of South Carolina

Adversary Proceeding No

25-80057 e.g.

Case No Chapter 7

25-02262-eg

IN RE:

Djuan Holland Debtor

Moorland BTR LLC, dba Moorland Reserve

Answer to Adversary Proceeding Dismissal

- (1) Morgan R Dunn emailed me Dec 4, 2025, with this so-called dismissal wanting me to consent and agree to something before she sent over the proposal what kind of Attorney does that nobody in their right mind would do something like that without knowing what it is that they're agreeing to.
- (2) I emailed Morgan R Dunn and told her I don't trust her and that she is up to something, and I still feel that way about her.
- (3) As a so-called Attorney she should know that there's always a deadline to respond to something pertaining to the court, not when she says so when she emailed me on Dec 4, 2025 I responded right back same day, when I asked the same thing by a date and time it took her 2 days what makes her thing that she any better not to respond back but I guess she entitled because she's an Attorney. Ms. Shana Montgomery had sent out deadlines for answer on or before Dec 22, 2025.
- (4) On line (4) in her Adversary Proceedings she states that I refused to consent please so me where I REFUSED to consent, if telling someone that you don't trust them and you know they're up to something and to come clean and be truthful is her definition of refusing because the last time I knew what refuse meant it was DECLINE which I didn't do, DENY which I didn't do, REJECT which I didn't do, RESIST which I didn't do I just asked her to be truthful which is something Morgan R Dunn can't do she rather tell lie's .

- (5) Online (6) Morgan R Dunn stated that this dismissal was in good faith and not for improper purpose now that's a lie.
- (6) Now I'm going to tell you the reasons why I don't trust Morgan R Dunn
- (7) (1) Morgan R Dunn has told so many lies on me, and I've always provided proof that she lied.
- (8) (2) Morgan R Dunn thinks I'm stupid and don't know what it means to have a case dismissed (WITHOUT PREJUDICE). It means that she can refile again, if it's really in good faith then dismiss (WITH PREJUDICE).
- (9) See, this is what she and her client are up to. They're not going to object to my discharge because she's planning on reopening my case for the following reasons, I'm not as stupid as she thinks that I am. (1) she knows that I can't file again for 4 yrs after being discharged on Chapter 7. (2) Concealment or Transfer of Property like committed fraud. I have addressed these issues numerous times and I'm tired of explaining it, it was addressed at the Creditor 341 Meeting it wasn't told to me that they knew about the two vehicles that are in my name I told them, I'm also tired of Morgan R Dunn saying that I allege that those vehicles were purchased by my son and haven't provided any proof of being said, now when the Trustee asked me about who paid the insurance I told her my son did off of his debit card she was fine with that, I also told her, that my son had gotten awarded his disability that he had been fighting for the past 8yrs. He lives in another state he purchased the two vehicles paid cash money, I put the vehicles in my name for insurance, and because the vehicles were tagged here in South Carolina it would be cheaper to leave things here, I DON'T and I REPEAT I DON'T HAVE ANYTHING TO DO WITH THOSE VEHICLES so Morgan R Dunn needs to leave it alone. Those vehicles haven't been back in South Carolina since my son left PERIOD. If you look, you will see that at the time when I had filed Chapter 13 and Chapter 7, I had no vehicles in my name. No one was trying to hide anything because if I was and if they were really my vehicles, they would've been in someone else's name but because no one was trying to hide anything this is where it stands, I'm a grown 61yr old woman who doesn't have to ALLEGE anything Morgan R Dunn. Because she wants to include two vehicles and whatever else she has up her sleeve as fraudulent concealment, hiding, this is what she's up to: Federal Rule of Bankruptcy Procedure 9024(relief from judgement) citing fraud/concealment.
- (10) Morgan R Dunn has been talking about the rent not being paid and the hardship that it has cost her client now all of a sudden you and your client want to VOLUNTARY DISMISS the case and not object to the discharge, but not once have you, your client, or any of the Judges in the lower court wanted to address the

discrepancies in the ledger that I've been saying from day one. Also, Morgan R Dunn has sent me two different Stipulation Proposal please see both attachments.

Best Regards

Djuan Holland

Dec 22, 2025