

IN THE COURT OF APPEALS
STATE OF SOUTH CAROLINA

Sophia V. Brown,

Appellant,

v.

**Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc.,
Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS10,**

Respondent.

South Carolina Court of Appeals

Case No. 2026-000925

MOTION TO STAY ENFORCEMENT PENDING APPEAL

(Rule 241, SCACR)

Appellant, **Sophia Brown**, respectfully moves the Court of Appeals for an order staying enforcement of the **Stay/Bond Order** entered by the Horry County Court of Common Pleas on **April 27, 2026**, pending resolution of this appeal.

This motion is made pursuant to **Rule 241(b)(1), SCACR**, and is necessary to preserve the status quo and prevent enforcement of conditions that would effectively deprive the Appellant of meaningful appellate review.

I. Procedural Posture

1. The lower court entered a **final judgment of foreclosure** on March 17, 2026.
2. Appellant filed a **timely Notice of Appeal** on April 14, 2026.
3. On April 27, 2026, the lower court entered a **final written Stay/Bond Order** imposing:
 - a. a bond requirement,
 - b. monthly rental-value payments,
 - c. projected tax and insurance obligations, and
 - d. a compliance deadline.
4. Appellant has filed a **Supplemental Notice of Appeal** to include the Stay/Bond Order within the scope of the pending appeal.
5. Enforcement of the Stay/Bond Order would impose obligations that Appellant cannot meet without risk of procedural default, loss of appellate rights, or acceleration of enforcement actions.

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II. Grounds for Relief

A. A Stay Is Necessary to Preserve Appellate Jurisdiction

Rule 241(b)(1), SCACR, authorizes the Court of Appeals to stay enforcement of a lower-court order when necessary to protect the appellate process. Enforcement of the Stay/Bond Order would:

- impose financial obligations not supported by the record,
- create deadlines that may result in dismissal of the appeal, and
- alter the status quo before appellate review can occur.

A stay is required to prevent the appeal from becoming moot through enforcement.

B. The Stay/Bond Order Contains Findings Not Supported by the Record

The Stay/Bond Order includes:

- rental-value calculations,
- tax and insurance projections,
- 36-month estimates, and
- factual findings

that were **not supported by evidence presented at the hearing**. Enforcement of unsupported findings before appellate review would cause irreparable harm.

C. Enforcement Would Effectively Deny Appellant Access to Appellate Review

The conditions imposed by the Stay/Bond Order:

- exceed Appellant's financial ability,
- were not supported by testimony or documentation, and
- would result in immediate non-compliance if enforced.

Rule 241 exists to prevent precisely this scenario—where enforcement of a disputed order would eliminate the ability to pursue an appeal.

D. The Status Quo Should Be Maintained

A stay preserves the status quo until the Court of Appeals can review:


- the foreclosure judgment,
- the evidentiary record,
- the remand scope, and
- the Stay/Bond Order.

Maintaining the status quo is the central purpose of Rule 241.

III. Relief Requested

Appellant respectfully requests that the Court of Appeals issue an order:

1. **Staying enforcement of the Stay/Bond Order entered April 27, 2026**, including all bond requirements, rental-value payments, projected tax/insurance obligations, and compliance deadlines;
2. **Staying any enforcement actions or proceedings in the lower court** related to the Stay/Bond Order; and
3. **Maintaining the status quo** pending resolution of this appeal.



Sophia V. Brown

Appellant Pro Se

1140 Woodruff Rd. Ste. 106.155

Greenville, SC 29607

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CORRECTED PROOF OF SERVICE

I, **Sophia V. Brown**, certify that on May 4, 2026, I served the following documents related to the above-referenced appeal:

1. **Corrected Motion to Stay Enforcement Pending Appeal**
2. **Corrected Petition for Supersedeas**
3. **Corrected Supplemental Notice of Appeal**
4. **Statement of Issues on Appeal**
5. **Motion to Waive Appellate Fees (including alternative request for 60 days to pay if waiver is denied)**
6. **Corrected Proof of Service (this document)**

Service was made by depositing true and correct copies of each document in the United States Mail, addressed as follows:

Chad W. Burgess

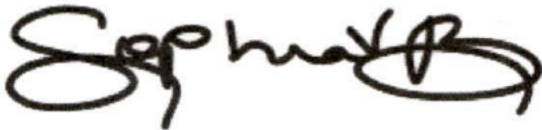
Counsel for Deutsche Bank Trust Company Americas
Brock & Scott, PLLC
WESTPARK CENTER
3800 Fernandina Road, Ste 110
Columbia, SC 29210

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I further certify that, pursuant to **Rule 262(c)(3), SCACR**, I am not permitted to serve attorneys by email, and therefore service was made **exclusively by U.S. Mail**.



Sophia V. Brown

Appellant Pro Se
1140 Woodruff Rd., Ste. 106-155
Greenville, SC 29607

May 4, 2026

Cover Letter for Deficiency Corrections

Re: *Sophia V. Brown v. Deutsche Bank Trust Company Americas*

Appellate Case No. 2026-000925

Submission of Corrected Filings to Cure Deficiencies

Dear Clerk of Court:

I am submitting the enclosed **corrected appellate packet** to cure the deficiencies identified in the Court's May 1, 2026 correspondence regarding the following filings:

- Motion to Stay Enforcement Pending Appeal
- Petition for Supersedeas
- Supplemental Notice of Appeal

I have **resubmitted the entire appellate packet originally filed on April 30, 2026**, with the following corrections:

1. **Corrected Proof of Service** reflecting service by U.S. Mail in compliance with Rule 262(c)(3), SCACR.
2. **Corrected copies** of the Motion to Stay Enforcement, Petition for Supersedeas, and Supplemental Notice of Appeal, each accompanied by the corrected Proof of Service.
3. **Request for relief** regarding the required filing fees

These corrected materials are being provided so that both the Court and counsel have complete and compliant copies of each filing.

Please let me know if any additional information or further corrections are required.

Respectfully submitted,



Sophia V. Brown

Appellant, Pro Se

1140 Woodruff Rd., Ste. 106-155 Greenville, SC 29607

Newcandy2010@gmail.com | 864-325-6354 | **May 4, 2026**

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