

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

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PETITION FOR SUPERSEDEAS

(Rule 241, SCACR)

Appellant, **Sophia Brown**, respectfully petitions the South Carolina Court of Appeals for **supersedeas** staying enforcement of the **Final Order on Stay, Bond, and Related Conditions** entered by the Horry County Court of Common Pleas on **April 27, 2026**, as well as enforcement of the underlying **foreclosure judgment**, pending resolution of this appeal.

This Petition is filed pursuant to **Rule 241(a)–(b), SCACR**, to preserve the status quo and prevent enforcement actions that would render the appeal ineffective or moot.

I. Procedural Background

1. On March 17, 2026, the lower court entered a **final judgment of foreclosure**.
2. Appellant filed a **timely Notice of Appeal** on April 14, 2026.
3. On April 27, 2026, the lower court entered a **Final Written Order on Stay, Bond, and Conditions** (“Stay/Bond Order”).
4. The Stay/Bond Order imposes:
 - a. a bond requirement,
 - b. monthly rental-value payments,
 - c. projected tax and insurance obligations,
 - d. a compliance deadline, and
 - e. additional findings not announced at the hearing.
5. Appellant has filed a **Supplemental Notice of Appeal** to include the April 27, 2026 Stay/Bond Order within the scope of the pending appeal.

6. Enforcement of the foreclosure judgment or the Stay/Bond Order would cause irreparable harm and would effectively deprive Appellant of meaningful appellate review.

II. Legal Standard

Under **Rule 241(a)–(b), SCACR**, the Court of Appeals may issue supersedeas to:

- stay enforcement of a judgment,
- stay enforcement of an order, and
- preserve the status quo pending appeal.

Supersedeas is appropriate where enforcement would:

- render the appeal moot,
- cause irreparable harm,
- impose obligations unsupported by the record, or
- prevent meaningful appellate review.

All of these conditions are present here.

III. Grounds Supporting Supersedeas

A. Enforcement Would Render the Appeal Ineffective or Moot

If the foreclosure judgment or Stay/Bond Order is enforced before appellate review:

- the property may be sold,
- the bond deadline may expire,
- Appellant may be deemed non-compliant,
- the appeal may be dismissed, and
- the appellate court may be unable to grant meaningful relief.

Supersedeas is necessary to prevent these outcomes.

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

The April 27, 2026 order includes:

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

that were **not supported by testimony or documentation** presented at the hearing.

Enforcing unsupported findings before appellate review would cause irreparable harm.

C. Enforcement Would Effectively Deny Appellant Access to Appellate Review

The Stay/Bond Order imposes financial obligations that:

- exceed Appellant's ability to comply,
- were not supported by evidence, and
- would result in immediate non-compliance if enforced.

Rule 241 exists to prevent enforcement of orders that would eliminate the ability to pursue an appeal.

D. Supersedeas Is Necessary to Preserve the Status Quo

The purpose of supersedeas is to maintain the status quo until the Court of Appeals can review:

- the foreclosure judgment,
- the evidentiary record,
- the remand scope, and
- the April 27, 2026 Stay/Bond Order.

Without supersedeas, the status quo will be irreversibly altered.

IV. Relief Requested

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

1. **Granting supersedeas** staying enforcement of the **April 27, 2026 Stay/Bond Order**, including all bond requirements, rental-value payments, projected tax/insurance obligations, and compliance deadlines;
 2. **Staying enforcement of the foreclosure judgment**, including any sale, deficiency proceedings, or related actions;
 - 3.
 4. **Staying all enforcement proceedings in the lower court** pending resolution of this appeal; and
 5. **Maintaining the status quo** until the Court of Appeals issues a final decision.
-



Sophia Brown

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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

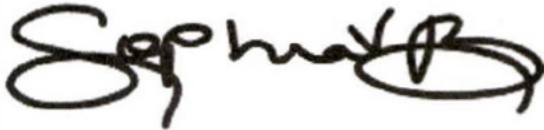
Counsel for Deutsche Bank Trust Company Americas
Brock & Scott, PLLC
WESTPARK CENTER
3800 Fernandina Road, Ste 110
Columbia, SC 29210

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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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