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May 21 2026

SC Court of Appeals

IN THE SOUTH CAROLINA COURT OF APPEALS

**Nationstar Mortgage, LLC,
Respondent,**

v.

**Carolyn Brantley, Grantor and General Executor of the Carolyn Brantley
Estate, Appellant.**

Appellate Case No. 2025-002464

**ENTRY BY SPECIAL APPEARANCE,
MOTION FOR LEAVE TO FILE OUT OF TIME,
NOTICE OF FRAUD UPON THE COURT,
AFFIDAVIT IN SUPPORT,
AND DEMAND FOR CONSTITUTIONAL REVIEW**

COMES NOW Carolyn Brantley, appearing specially and not generally, without waiver of any constitutional, equitable, procedural, jurisdictional, or substantive rights, and respectfully places the Court on notice of the following:

1. SPECIAL APPEARANCE

Carolyn Brantley enters this matter by special appearance only for the limited purpose of preserving the Estate, protecting the chain of title, objecting to procedural irregularities, preserving constitutional guarantees, and preventing irreparable harm resulting from alleged fraud, concealment, and unlawful conveyance.

No appearance herein shall be construed as consent to undisclosed jurisdictional defects, waiver of due process rights, waiver of notice defects, or acquiescence to any fraudulent or unauthorized acts affecting the Estate.

2. FAILURE OF NOTICE / DUE PROCESS DEFECTS

Appellant affirms in good faith that she was never properly served with any prior court acknowledgment, scheduling directive, or order allegedly requiring service upon opposing parties prior to the Court's recent correspondence dated May 14, 2026.

The first known acknowledgment received by Appellant appears to be the recent notice from the Clerk of the Court of Appeals advising that the appeal may be dismissed absent further filings.

Due process protections guaranteed under the Fourteenth Amendment to the United States Constitution and Article I of the South Carolina Constitution require meaningful notice and an opportunity to be heard before deprivation of property rights may occur.

See:

- Mullane v. Central Hanover Bank & Trust Co.
- Schware v. Board of Bar Examiners
- Haines v. Kerner

Pursuant to Haines v. Kerner, filings submitted by a self-represented litigant are to be liberally construed in the interest of justice.

3. FRAUD UPON THE COURT / HARD LOOK REVIEW

Appellant and representatives of the Carolyn Brantley Estate have found substantial reason to believe fraud upon the court and securities-related irregularities may exist within the underlying proceedings and chain of title instruments associated with the subject property and loan servicing activities.

Such concerns include but are not limited to:

- a. possible defects in assignments, endorsements, securitization authority, or conveyance instruments;
- b. concealment or omission of material facts;
- c. unauthorized transfers affecting title;
- d. potential theft by conversion, fraudulent conveyance, or unlawful seizure attempts against Estate property;
- e. procedural defects impairing the integrity of judicial proceedings.

Fraud upon the court vitiates judgments and is not constrained by ordinary limitations periods where the integrity of the tribunal itself is implicated.

The Estate therefore invokes this Court's inherent constitutional and equitable authority to conduct a "hard look" review of all material facts, assignments, affidavits, securitization instruments, standing assertions, and jurisdictional predicates relied upon by Respondent.

The Estate further invokes principles reflected in:

- *Loper Bright Enterprises v. Raimondo*
- *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*
- *United States v. Throckmorton*

4. SOUTH CAROLINA CONSTITUTIONAL GROUNDS

Appellant invokes protections under the South Carolina Constitution, including but not limited

- to:
- Article I, Section 3 (Due Process);
 - Article I, Section 10 (Right to Justice/Open Courts);
 - Article V (Judicial Authority and Oath Obligations).

All judicial officers and public officials are bound by oath to support and defend constitutional guarantees and to prevent deprivation of property absent lawful authority and procedural integrity.

5. PRESERVATION OF ESTATE PROPERTY / CHAIN OF TITLE

The Carolyn Brantley Estate expressly objects to any unauthorized conveyance, seizure, transfer, foreclosure activity, dispossession, title impairment, or administrative action affecting Estate property while unresolved fraud allegations and constitutional defects remain under review.

Appellant asserts that any act breaking the lawful chain of title requires reversal, correction, rescission, or judicial review before enforcement activity may continue.

6. MOTION FOR LEAVE TO FILE OUT OF TIME

Appellant respectfully requests leave of Court pursuant to Rules 208, 209, and 240, SCACR, to serve and file the Initial Brief and Designation of Matter out of time due to:

- a. lack of prior notice;
- b. procedural confusion affecting a self-represented litigant;
- c. ongoing investigation into alleged fraud and title defects;
- d. constitutional concerns affecting substantial property rights.

Good cause exists because dismissal under these circumstances would substantially prejudice the Estate and potentially permit irreversible harm before constitutional review may occur.

7. REQUEST FOR EQUITABLE RELIEF

Appellant respectfully requests:

- a. leave to file out of time;
- b. temporary stay of any enforcement activity affecting the Estate property;
- c. preservation of all records, servicing data, assignments, securitization records, and communications;
- d. constitutional and equitable review of alleged fraud upon the court;
- e. such other relief as this Court deems just and proper.

AFFIDAVIT

- I, Carolyn Brantley, being first duly sworn, affirm under penalty of perjury that:
1. I am the Grantor and General Executor associated with the Carolyn Brantley Estate.
 2. I did not knowingly receive prior acknowledgment or instruction allegedly requiring service before receipt of the Court's recent notice dated May 14, 2026.
 3. I have good-faith reason to believe procedural defects and fraud-related irregularities may exist affecting the subject proceedings and Estate property.
 4. I submit this filing in good faith for constitutional protection and preservation of property rights.
 5. The statements herein are true and correct to the best of my knowledge and belief. Executed this 21st day of May, 2026.

Carolyn Brantley
 Carolyn Brantley
 Grantor / General Executor

Subscribed and sworn before me this 21st day of May, 2026

Cathleen A. Mervin

Notary Public
 My Commission Expires: Nov. 14, 2025



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CERTIFICATE OF SERVICE

I, Carolyn Brantley, hereby certify that a true and correct copy of the foregoing Constitutional Authority, Judicial Oath, Property Rights, has been served this 21st day of May, 2026, upon the following party by first-class U.S. Mail and electronic service, addressed as follows:

Counsel for Plaintiff:

Nationstar Mortgage, LLC

Thomas A. Shook, Esq.

Finkel Law Firm LLC

P.O. Box 71727

North Charleston, SC 29415

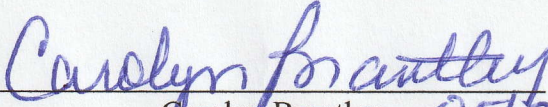
Phone: (843) 577-5460

Email: ashook@finkellaw.com

and

James A. Grimsley, III

jimgrimsley@tgdcpa.com


Carolyn Brantley 05/21/2026
General Executor—Witness—Claimant