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May 29 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
The Honorable James E. Chellis
Master in Equity for Dorchester County

Appellate Case No. 2026-000306

Reliance First Capital, LLC, Respondent,

v.

Nikia Renee Noisette and Arbor Oaks Homeowners Association, Defendants,

of which Nikia Renee Noisette is the Appellant.

APPELLANT'S REPLY TO RESPONDENT'S RETURN IN OPPOSITION TO EMERGENCY
MOTION TO STAY ENFORCEMENT PENDING APPEAL

Nikia Renee Noisette
402 Arbor Oaks Drive
Summerville, South Carolina 29485

Appellant, In Propria Persona Sui Juris

Appellant, Nikia Renee Noisette, respectfully submits this Reply to Respondent's Return in Opposition to Appellant's Emergency Motion to Stay Enforcement Pending Appeal and respectfully states as follows:

RELEVANT PROCEDURAL HISTORY

This appeal involves substantial unresolved issues concerning service of process, personal jurisdiction, due process protections, standing, transcript accuracy, and unresolved Rule 210(j), SCACR, record disputes affecting the integrity and completeness of the appellate record presently before this Court.

Respondent's Return characterizes Appellant's Rule 60(b)(4) jurisdictional challenge as having arisen after the foreclosure sale; however, the procedural history and docket reflect otherwise.

The docket reflects that Appellant previously filed a Rule 60(b)(4)-related jurisdictional challenge prior to the May 2025 foreclosure sale, including a filing docketed as "Exhibit B: & 60 B4 Void Order/Judgment Emergency Hearing With No Undue Delay," dated October 30, 2024 and filed November 7, 2024 (**Exhibit B**). The Dorchester County Clerk of Court thereafter issued correspondence dated November 7, 2024 acknowledging receipt of said filing and directing Appellant to contact chambers regarding scheduling of a hearing concerning the filing (**Exhibit A**).

The docket further reflects Appellant's subsequently filed "Clarification of Prior Filing – Motion to Void Judgment" dated June 4, 2025 (**Exhibit C**), which was submitted to clarify the procedural posture and nature of the previously filed Rule 60(b)(4)-related jurisdictional challenge.

Appellant respectfully submits that these filings demonstrate that jurisdictional objections and Rule 60(b)(4)-related matters were raised prior to the foreclosure sale and were not fully adjudicated before subsequent foreclosure enforcement and dispossession efforts were initiated.

At the time Appellant received correspondence directing her to contact chambers concerning the pending Rule 60(b)(4)-related filings, Appellant was simultaneously involved in active bankruptcy proceedings affecting the subject property. Those proceedings materially affected the procedural posture of the matter and occurred during the period in which the jurisdictional challenge remained unresolved and without substantive adjudication prior to the foreclosure sale.

Accordingly, Appellant respectfully submits that Respondent's assertion that the jurisdictional challenge arose only after the foreclosure sale is inconsistent with the procedural history reflected by the docket and exhibits attached hereto.

Appellant further respectfully submits that unresolved Rule 210(j), SCACR, record issues remain pending concerning omissions, procedural irregularities, docket accuracy, transcript accuracy, and proceedings not fully reflected within the appellate record presently before this Court.

ARGUMENT

Respondent's Return attempts to characterize the present appeal as involving only possession of the subject property; however, the pending appeal raises substantial unresolved issues concerning:

- a. service of process;
- b. personal jurisdiction;
- c. due process protections under the Fourteenth Amendment to the United States Constitution and Article I, Section 3 of the South Carolina Constitution;
- d. transcript accuracy and completeness;
- e. unresolved Rule 210(j), SCACR, record disputes; and
- f. the integrity and procedural validity of the underlying foreclosure proceedings, including issues concerning standing and enforcement authority.

Appellant respectfully submits that temporary preservation of the status quo is necessary to preserve meaningful appellate review while these unresolved jurisdictional and procedural issues remain pending before this Court.

Respondent's reliance upon S.C. Code Ann. § 18-9-170 does not eliminate this Court's equitable authority to preserve appellate jurisdiction and prevent irreparable harm where substantial jurisdictional, procedural, and record-related disputes remain unresolved.

Appellant further respectfully submits that immediate enforcement and dispossession from the subject property, which Appellant presently occupies as her primary residence, risks impairing meaningful appellate review before this Court has fully resolved the pending appellate and jurisdictional matters.

The loss of a primary residence constitutes irreparable harm that cannot be fully remedied if appellate review ultimately results in reversal, vacatur, or other relief affecting the validity of the underlying judgment.

The balance of equities favors maintaining the present status quo pending final appellate determination so that meaningful review may occur before potentially irreversible enforcement measures are undertaken.

CONCLUSION

WHEREFORE, for the reasons stated herein and within Appellant's Emergency Motion to Stay Enforcement Pending Appeal, Appellant respectfully requests that this Honorable Court:

1. Grant Appellant's Emergency Motion to Stay Enforcement Pending Appeal;

2. Stay issuance and/or execution of any Writ of Assistance pending resolution of this appeal;
3. Preserve the status quo pending appellate review; and
4. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted this 28th day of May, 2026.



Nikia Renee Noisette

Appellant, In Propria Persona Sui Juris
402 Arbor Oaks Drive
Summerville, South Carolina [29485]

EXHIBIT LIST

Exhibit A

November 7, 2024 correspondence from Dorchester County Clerk of Court referencing previously filed Motion to Void Order/Judgment and directing Appellant to contact chambers regarding scheduling.

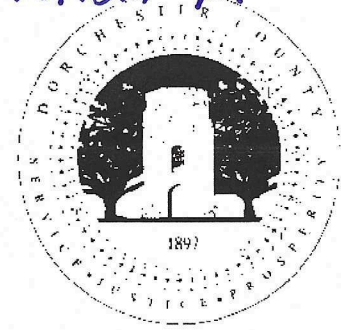
Exhibit B

October 30, 2024 filing styled "Exhibit B: & 60 B4 Void Order/Judgment Emergency Hearing With No Undue Delay."

Exhibit C

June 4, 2025 Clarification of Prior Filing – Motion to Void Judgment.

Exhibit A



DORCHESTER COUNTY CLERK OF COURT
Cheryl Graham, Clerk of Court
5200 East Jim Bilton Blvd.
St. George, SC 29477

November 7, 2024

Nikia Renee Noisette
402 Arbor Oaks Drive
Summerville, SC 29485

Re: Presentment Under Notary Seal Documents (8 pages)

Dear Mrs. Noisette:

Enclosed please find the documents that were received in our office on November 5th, 2024. Under SC Code Section 30-9-30(B)(1), I am refusing to file these documents as I believe some of these documents are materially false or fraudulent or is a sham legal process.

Please note that Persons knowingly presenting documents in connection with a sham legal process may be subject to criminal prosecution, not only under the Federal Mail Fraud Statute, but also under S.C Sham Legal Documents Statute (Section 16-17-735), and such action may amount to obstruction of justice if you purport to prevent a South Carolina Court from exercising its jurisdiction.

Lastly, Exhibit B:& 60 B4 Void Order/Judgment Emergency Hearing with no Undue Delay has been filed. I have enclosed two certified copies. One copy is for your records and the other copy is for you to serve on the plaintiff's attorney. Also, you need to contact Judge Chellis Assistant, Meagan, to set up a hearing within 30 days. Her email is address is mkizer@dorchestercountysc.gov.

Sincerely yours,

Cheryl Graham
Clerk of Court for Dorchester County
Enclosures: stated

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
DORCHESTER COUNTY)	2 nd JUDICIAL CIRCUIT
)	CASE NUMBER: 2024CP1800207
)	JUDGE JAMES E CHELLIS
<u>Reliance First Capital LLC</u>)	
)	EXHIBIT B: & 60 B4
Plaintiff,)	VOID ORDER/JUDGMENT
vs.)	EMERGENCY HEARING WITH NO
)	UNDUE DELAY
<u>Nikia Renee Noisette</u>)	
)	October 30, 2024
Defendant.)	

SUBJECT: Void Order/Judgment

1. The facts of this case are that the opposing party Reliance First Capital Llc Affidavit is contested for a lack of Procedural due process James E. Chellis; By a Breach of Trust caused me great injury as well through a wrongful foreclosure and abuse of discretion. *James E. Chellis*, James Martin Page representative of Reliance First Capital Llc Reliance First Capital Llc in error, Negligence, Breach of Trust, unprofessional Conduct and unfair practices deprived me of my constitutional secured rights to DUE PROCESS OF LAW, THE 14th amendment equal protection AND South Carolina Constitution Articles 1 Sections 1, 3, 4, 5, 22, 23; This court lacked Jurisdiction they knew it and still went forward with defective evidence filed in the case there were not proper service to gain personal jurisdiction. There was no such right to foreclose without Jurisdiction See *In re Foreclosure of Real Prop. for \$143,600.00*, 156 N.C.App. 477, 577 S.E.2d 398, 406 (2003) ("In a foreclosure proceeding, the lender bears the burden of proving that there was a valid debt, default, right to foreclose under power of sale, and notice."); 55 Am. Jur. 2d *Mortgages* § 604 ("[T]he burden of proof of any particular issue rests upon the party asserting the affirmative of that issue under the pleadings."); *cf. Paramount Fund, Inc. v. Cusaac*, 282 S.C. 497, 499, 319 S.E.2d 354, 355 (Ct.App. 1984) (holding the mortgagee has the burden of proving a disputed mortgage by the preponderance of the evidence). Material evidences the Affidavit and a factual witness was not provided to the Defendant and my right to a Fair and impartial Trail because lack of service, to which I have been repeatedly denied,
2. Affidavits submitted by a party must be made on personal knowledge and must set forth facts that would be admissible in evidence. Rule 56(e)(1), FRCP. Just as the requirements for the form of a statement should not be relaxed, evidentiary requirements also should be strictly enforced. Failure to analyze the substance of an affidavit, in light of the requirements of the Rules of Evidence, can undermine the integrity of the process.

3. I was not personally served the alleged service does not identify me or anyone from my home. I was not told about the Mediation process. James E. Chellis has ordered the fraudulent sale of my property violating my Civil Liberties without a proper investigation of the evidence therefore any rulings, orders and judgements are void Ab Initio. And that inevitably leads to questions of who owes what? Who is the true holder is in due course? Merely having paperwork doesn't mean you have a legitimate claim or the right to foreclose 3. Reliance First Capital Llc *and its representatives* never proved this after I Nikia Renee Noisette Contest the Jurisdiction and the Affidavit to obtain the material facts and other supportive evidence showing where the Court Jurisdiction came from without serving me did, Reliance First Capital Llc actually have personal Jurisdiction without serving the Summons and complaint personally to I Nikia Renee Noisette?

4. Notice South Carolina a void judgment is one that, from its inception, is a complete nullity and is without legal effect." *Thomas & Howard Co. v. T.W. Graham and Co.*, 318 S.C. 286, 291, 457 S.E.2d 340, 343 (1995). The definition of void under the rule only encompasses judgments from courts which failed to provide proper due process, or judgments from courts which lacked subject matter jurisdiction or personal jurisdiction." *McDaniel v. U.S. Fid. & Guar. Co.*, 324 S.C. 639, 644, 478 S.E.2d 868, 871 (Ct. App. 1996). It is fundamental that no judgment or order affecting the rights of a party to the cause shall be made or rendered without notice to the party whose rights are to be affected." *Tyron Fed. Sav. & Loan Ass'n v. Phelps*, 307 S.C. 361, 362, 415 S.E.2d 397, 398 (1992). Generally, a person against whom a judgment or order is taken without notice may rightly ignore it and may assume that no court will enforce it against his person or property. The requirements of due process not only include notice, but also include an opportunity to be heard in a meaningful way, and judicial review. *Grannis v. Ordean*, 234 U.S. 385, 394 (1914) ("The fundamental requisite of due process of law is the opportunity to be heard."); *S.C. Dep't of Soc. Servs. v. Holden*, 319 S.C. 72, 78, 459 S.E.2d 846, 849 (1995).

Proper Service requires personal service. See *State v. Sullivan* 127 S.C. *BB&T v. Taylor* An act is willful if done voluntary and intentionally with the specific intent to fail to do something the law requires to be done; with bad purpose either to disobey or disregard the law *Wilson v. Walker* furthermore, the person providing the service, upon information and belief, is not the sheriff or his deputy or any other duly constituted law enforcement officer, My action are out of necessity and not disregard. This is not only an injury to me and my family but to the public.

5. Notice: I Nikia Renee Noisette the real party in Interest gives Notice to STATE OF SOUTH CAROLINA, DORCHESTER, County, Clerk of Court, The Trier of Fact,

And the Trier of the Case. That no valid Order was made on 5-23-24 the actions are Void. I Nikia Renee Noisette the real party in Interest makes this Motion and demand of Rule 60 (B) (4) Void order to restore me by following the established law I Nikia Renee Noisette the real party in Interest have a right to make an Special Appearance/Restricted Appearance and Challenges the Original jurisdictions of the Court at DORCHESTER COUNTY Master-IN-Equity Division also I Demand the Real party in interest who brought the claims and object to any Third party representatives therefore I demand the real party in interest be present to testify under penalty of perjury. I was not Properly given full due process of law the James E. Chellis Master-IN-Equity, Court Officers, and plaintiff caused me multiple injuries engaging in a error of law to violate my Personal Liberty to property protected and secured Under Article 1 sections 3 and 13 to SC constitution, Article 4 the 5th and 14th amendment of the federal constitution Prove by what constitutional authority did the plaintiffs, Officers and this court acted upon to force upon I Nikia Renee Noisette a wrongful non-judicial foreclosure and to deprive me of my home, possessions and civil liberty on.

6. According to the rule of law A defect in service of process by publication is jurisdictional, rendering any judgment or order obtained thereby void. Jones v. Wallis, 211 NC App. 353, 712 S.E.2d 180 (2011).

I Nikia Renee Noisette Am Contesting the Affidavit by authority of Rule 56(e)(1), FRCP Constitutional requirements of due process apply to garnishment and prejudgment attachment procedures whenever state officers act jointly with a private creditor in securing the property in dispute. Sniadach v. Family Finance corp.

7. The U.S. Supreme Court has apparently never retreated, from the precedent and merits set in federal rules of civil procedure 4 D this means that this issue was decided years ago, it is the law of the land and it overrides any state court that would rule otherwise.
8. Rule 55 (4) Judgments after Service by Publication; Affidavit; Undertaking. In actions for the recovery of money only, when the summons has been served by publication and the defendant is a non-resident of the State, no default judgment shall be rendered unless the plaintiff or his agent at or before the time of making the application for judgment shall have been examined on oath respecting any payments that have been made to the plaintiff or any one for his use on account of the demand mentioned in the complaint, and shall show by affidavit that an attachment has been issued in the action and levied upon property belonging to the defendant, which affidavit shall contain a specific description of such property, and a statement of its value and shall be filed with proof of publication. Before judgment is rendered the plaintiff shall, unless the court in its discretion dispenses with the same, cause to be filed an undertaking in such amount as shall be ordered by the court with security to be approved by the court or the clerk thereof, that the plaintiff will abide the order of the court

touching the restitution of any estate or effects which may be directed by such judgment to be transferred or delivered, or the restitution of any money that may be collected under, or by virtue of, such judgment, in event the defendant or his representative shall apply and be admitted to defend the action and shall succeed in such defense.

9. In order to establish standing, three elements must be established. First, the party must have suffered an injury in fact---an invasion of a legally protected interest which is (a) concrete and particularized and (b) actual or imminent, not conjectural or hypothetical. Second, there must be a causal connection between the injury and the conduct complained of---the injury has to be fairly traceable to the challenged action of the adverse party and not the result of independent action of some third party not before the court. Third, it must be likely as opposed to merely speculative, that the injury will be redressed by a favorable decision. See *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 112 S.Ct. 2130, 2136, 119 L.Ed.2d 351 (1992); *Chambers Medical Technologies of*
10. An abuse of process and malicious prosecution by *Reliance First Capital Llc, its representatives and Judge James E. Chellis* Dorchester County Clerk of Court, The Trier of Fact, And the Trier of the Case willfully filed an alleged civil action in conspiracy with an agent for alleged "Plaintiff", with no valid Affidavit or evidence to support the claim is clear "Fraud by the Court" and its officials which is unlawful and void. The Plaintiff cannot meet the requirements to establish Standing, and did not take an oath according to Rule 603 of the federal civil procedure and South Carolina Civil procedure Rule 30. Therefore the Affiant has not entered any valid testimony or factual injury. Judge is charged to know without Full Due process of law, evidence or factual testimony in connection to the alleged claim the court order is void. And is a violation of I Nikia Renee Noisette Civil and personal Liberties.
11. SC Con Article 1 Section 3 the privileges and immunities of citizens of this State and of the United States under this Constitution shall not be abridged, nor shall any person be deprived of life, liberty, or property without due process of law, nor shall any person be denied the equal protection of the laws. (1970 (56) 2684; 1971 (57) 315.)
12. Where a party submits an affidavit to the court that contains information inconsistent with the party's prior deposition testimony or other sworn submission, courts hold that these contradictory affidavits should be disregarded as "shams" or "competing affidavits." See *Margo v. Weiss*, 213 F.3d 55, 63 (2nd Cir. 2000); *Rohrbough v. Wyeth Labs. Inc.*, 916 F.2d 970, 976 (4th Cir.

1990); *Martin v. Merrell Dow Pharms., Inc.*, 851 F.2d 703, 705 (3rd Cir. 1988).
C Further A federal and State agency cannot in manner through administrative
convenience adopts a regulation or through nonfeasance permits under the color
of State and federal law inferior authorities to deny my secured Constitutional
rights or ignores Congress' intent.

13. Without Standing, an agreement/contractor, Relevant Evidence rule 401 there is
no duty to comply with Void Order, sham legal proceedings and Fraudulent
Claims not based in Facts from a constitutional court judge competent in the
nature of Law. I Nikia Renee Noisette the real party in Interest is the party
immensely injured by the Defendants actions. The courts provide pro se parties
wide latitude when construing their pleadings and papers. When interpreting
pro se papers, the Court should use common sense to determine what relief the
party desires. *S.E.C. v. Elliott*, 953 F.2d 1560, 1582 (11th Cir. 1992). See also,
United States v. Miller, 197 F.3d 644, 648 (3rd Cir. 1999) (Court has special
obligation to construe pro se litigants' pleadings liberally); *Poling v.*
K.Hovnanian Enterprises, 99 F.Supp.2d 502, 506-07 (D.N.J. 2000).

14. The state and federal government has a Duty to their assent to the Constitutions
to uphold the Law of the land and its rules by not suppressing liberty or
converting rights secured by the constitution into privileges without factual
authority. Without possessing and having a factual injury rule 17 not a
conjectural or moral victim the pleadings are false. Nikia Renee Noisette for the
Record has made several objections to testimony of plaintiff and practices of the
Master IN Equity.

15. According to the rule of law A defect in service of process by publication is
jurisdictional, rendering any judgment or order obtained thereby void. *Jones v.*
Wallis, 211 NC App. 353, 712 S.E.2d 180 (2011).

Affidavits that fail to comply with the Rules of Procedure "should be stricken and
disregarded." 35B C.J.S. Federal Civil Procedure § 1214 (2008). The proper avenue by
which counsel should seek such exclusion on pending motion for summary judgment is
by motion to strike pursuant to Rule 56(e) of the Rules of Civil Procedure or,
alternatively, by raising a more general objection to the admissibility of the contents of
the submission. *Saucier v. Coldwell Banker JME Realty*, 2007 WL 2475943 *3 (S.D.
Miss. 2007) (citing *Auto Drive-Away Co. of Hialeah, Inc. v. Interstate Commerce*
Comm'n, 360 F.2d 446, 448-49 (5th Cir. 1966)); *Larouche v. Webster*, 175 F.R.D. 452,
454 (S.D.N.Y. 1996).

Article 1 SECTION 23. Provisions of Constitution mandatory. The provisions of the
Constitution shall be taken, deemed, and construed to be mandatory and prohibitory, and

not merely directory, except where expressly made directory or promissory by its own terms. (1970 (56) 2684; 1971 (57) 315.),

16. ***"The court is to protect against any encroachment of constitutionally secured liberties." Due Process must be invoked before removing rights secured under the constitutions.***

17. The Law was made to protect and not to compel. Allegations have been made without a proper investigation that are fraudulent in nature and has caused me and my family great injury. I Nikia Renee Noisette was never served with a valid Summons and Complaint. Rule 4 (d) of the South Carolina Rules of Civil Procedure to be the equivalent of a statute, strict compliance with both that rule and section 15-9-740 would be required since service by publication is in derogation of the common law, therefore requiring strict compliance with the authorizing statute or rule. See, Wayne County, ex rel. Williams v. Whitley, 72 NC App. 155, 323 S.E.2d 458 (1984); see also, Caldwell v. Wiquist, 402 SC 565, 741 S.E.2d 583 (Ct. App. 2013) (to avoid resolving litigation by default, strict compliance with publication statutes is required).

18. Further When the Rules of Civil Procedure were promulgated by the Supreme Court and not rejected by the General Assembly, the latter also passed a bill which attempted to repeal those statutes previously enacted which were in conflict with the Rules of Civil Procedure. See 1985 Act 100 (effective 7/1/85). The legislature further provided that in the event of conflict between any provision of the South Carolina Rules of Civil Procedure and any other statutory provisions as to practice and procedure not otherwise repealed by the Act, the provisions of the rule would prevail. Since procedure concerns the machinery for carrying on a legal action, including pleadings, process, evidence and practice, it appears clear that service by publication concerns a matter of procedure. Based upon this Act, the dictates of Rule 4 would prevail

19. I Nikia Renee Noisette am the Victim of the improper use of the courts and a Void Order is required to clean up the damages to me from a lack of due process evidenced by the attachments proof that there was no true diligent search by Service agents stating my son was served at my home when that was never the case the court is in error by using that as proof of diligent service to invoke service by publication. Since the service of a summons, which gives a court the power to render a judgment over a party within its jurisdiction, must be accomplished with service of the complaint, there is no personal jurisdiction over a party without the service of both summons and complaint together. Without personal jurisdiction, any judgment rendered by a court is void.

Universal Benefits, Inc. v. McKinney, 349 S.C. 179, 561 S.E.2d 659 (Ct. App. 2002) (A judgment is void when a court lacks personal jurisdiction over a party). Because a void judgment is a nullity, it may be attacked at any time within "reason" without a showing of excusable neglect or meritorious defense. See *Flanagan, James F.*, South Carolina Civil Procedure (2d Ed.). Under Rule 60(b) (4), relief where a judgment is void is non-discretionary and a matter of right. *Richardson Construction Co. v. Meck Engineering & Construction Co.*, 274 S.C. 307, 262 S.E.2d 913 (1980). As a result, if the above analysis proves true, any service by publication upon a defendant which is undertaken in conformance with section 15-9-740 may have been improper and cause the judgment rendered upon a default to be void and subject to relief pursuant to Rule 60(b)(4) of the South Carolina Rules of Civil Procedure.

20. In conclusion the mere signing of a statement in the presence of a notary, or a notary's placement of an "acknowledgment" on a statement, does not constitute a sworn statement or affidavit. In *Orsi v. Kirkwood*, 999 F.2d 86, 91 (4th Cir. 1993) I Nikia Renee Noisette the real party in Interest demand the court Grant my Relief because the void order is made by an abuse of discretion by an error of law being without constitutional Authority and the State Court acted without Jurisdiction failing to personally serve I Nikia Renee Noisette the real party in interest and not giving me my day in court South Carolina is a Judicial Foreclosure State. Without Standing, an Oder agreement/contract is void there is no duty to comply with sham legal proceedings and Fraudulent Claims not based in Facts.
21. I Nikia Renee Noisette the real party in Interest is immensely injured by Void Order and the Unlawful Practices Of *James E. Chellis C/A# 2024CP1800207* and Demand the court Grant me my right to relief for the violation of my constitutionally secured rights I further request an injunction to stop any further proceedings against my home promptly, additional cost for Stress of me and my Family due to abuse of Process the courts, false Claims, No Due Process, and wrongful Foreclosure. I also demand court Cost. The alleged Claims of Service and Debt Must be proven by Fact that I Nikia Renee Noisette am tremendously injured by the plaintiff and the Officers of the court they have a duty under the rules of professional & Judicial Conduct to report fraud and abuse of process upon the court by any of its officers.
22. WHEREFORE, I Nikia Renee Noisette the real party in Interest would like to resolve this Matter Peacefully if Possible. And request, Demand and pray that the representation or plaintiff fulfill the Law and Rules associated and Nol Process/dismiss their claim Civil Rule 60 B4, 12 (b) 6 and this court void all Claims so that my primary rights will not continue to be infringed and grant me damages for relief based on the multiple injuries caused by the plaintiff

employee's officers in their official capacity and in color enforcing a void Order state codes that deprived me and my Family of our home and Constitutional right to a fair and impartial Trial.


23. **Injury:** Due to the above mentioned facts the failure of the court to recognize that they must apply the rules of service and laws that apply resulted not only in no personal Jurisdiction, the wrongful foreclosure of my property, but the foreclosure of my ability to negotiate a settlement with an undisclosed equitable creditor, or with the alleged legal owner of the loan in the property records. We have suffered extreme mental anguish further including but not limited to doctor visits and extreme migraines caused by other health issues do to the stress on the alleged day of Service. We have also suffered from Slander James E. Chellis has caused my home to be listed for sale, by color of law. And my family and I have undergone tremendous stress and tension as a result of the Plaintiffs Actions.

Relief

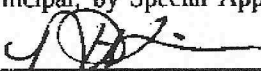
WHEREFORE, I would like the Affidavit to be Stricken and disregarded by the court granting a new fair and impartial trial to cause the plaintiff to prove their burden of proof, also void and vacate the court order(s) based on the established precedents of the stare decisis voiding the sale of my home and resolve this Matter Peacefully if Possible And I request/Pray judgment against defendant(s) Reliance First Capital Llc, its representatives, for economic Civil Tort, 270,000.00 and psychological damages 2500.00 as well as compensatory damages 150,000.00 plus costs and fees in the Amount of 5000.00 and respectfully ask this Court for leave to move for punitive damages. I was violated by fraud, negligence unprofessional Conduct, lack of proper service and never properly noticed or contacted about the mediation process or given the proper notices that would have allowed me the ability to properly negotiate. Reliance First Capital Llc caused a deprivation of my civil liberties; and constitutional secured rights to Due process and a fair and impartial trial.

The use of notary below is for identification only, and such use does NOT grant any jurisdiction to anyone.

Subscribed and sworn, without prejudice, and with all rights reserved.



Principal, by Special Appearance, in Propria Persona, proceeding Sui Juris.



Signature of Affiant

ACKNOWLEDGMENT

state of SOUTH CAROLINA

county of dorchester

On this 30th day of October, 2024, before me

personally appeared Nikia Renee Noisette, to me known to be the person described in and who executed the foregoing instrument and acknowledged that he executed the same as his free act and deed, for the purposes therein set forth.

Shal'a Dixon
(Notary Public)

My Commission Expires 8-23-32, 2032

ucc 1-207 1-308 1-103, 3-306 3-306

Nikia Renee Noisette
Dorchester South Carolina
Via United States Republic, North America
Non-Domestic, Non-Resident
Zip Exempt [29485]
843 377-9103



STATE OF SOUTH CAROLINA
DORCHESTER COUNTY

) IN THE COURT OF COMMON PLEAS
) JUDICIAL CIRCUIT
) CASE NUMBER: 2024CP1800207

Reliance First Capital LLC

Plaintiff,

vs.

Nikia Renee Noisette

Defendant.

JUDGE JAMES E CHELLIS

& 60 B4

VOID ORDER/JUDGMENT
EMERGENCY HEARING WITH NO
UNDUE DELAY

June 4, 2025

Clarification of Prior Filing – Motion to Void Judgment

COMES NOW, the Defendant, Nikia Renee Noisette, in propria persona, and respectfully submits this Clarification for the record concerning the previously filed Motion to Void Order/Judgment dated October 30, 2024.

This Clarification is offered to assist the Court in accurately interpreting the notation "Exhibit B: & 60 B4" as stated in the caption of that motion.

The Defendant hereby clarifies the following:

- The reference to "Exhibit B" pertains to a supporting document properly attached and filed with the original motion.
- The term "60 B4" was intended to invoke Rule 60(b)(4) of the South Carolina Rules of Civil Procedure, which provides relief from a void judgment—specifically where the issuing court lacked jurisdiction or where due process violations occurred.

At the time of filing my Motion to Void Judgment, I was actively engaged in a bankruptcy proceeding before the United States Bankruptcy Court. Although the foreclosure had already taken place, the motion was filed while my bankruptcy case was pending. This is relevant because my bankruptcy estate, established under IRS Publication 908, holds a claim to the property and related equity under 11 U.S.C. § 541.

Additionally, the Defendant asserts that the plaintiff's counsel, James M. Page, lacks legal standing to pursue further action in this matter. It is known and evidenced that his client, Reliance First Capital LLC, has been indemnified through an FHA insurance claim. Despite this indemnification, Mr. Page has continued efforts to facilitate the sale of the Defendant's home, an act which raises serious concerns of double recovery, unjust enrichment, and

FILED-RECORDED
2025 JUN -5 PM 4:32
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

RECEIVED

May 29 2026

SC Court of Appeals

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Appellant's Reply to Respondent's Return in Opposition to Emergency Motion to Stay Enforcement Pending Appeal was served upon counsel for Respondent by United States Mail and/or electronic mail this 28th day of May, 2026, addressed as follows:

J. Martin Page, Esq.
Bell Carrington Price & Gregg, LLC
339 Heyward Street, 2nd Floor
Columbia, South Carolina 29201
mpage@bellcarrington.com



Mikia Renee Noisette
Appellant, In Propria Persona Sui Juris
402 Arbor Oaks Drive
Summerville, South Carolina [29485]