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Jul 07 2026

SC Court of Appeals

**STATE OF SOUTH CAROLINA
In the Court of Appeals
Appellate Case No. 2025-001651**

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Dale E. Van Slambrook
Case No. 2025CP1001379

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Maite Murphy
Appellate Case No. 2025CP1001651

APPEAL FROM CHARLESTON COUNTY
Magistrates Court
The Honorable Cheryl Perry
Court Judge Case No: 2025CV1011200030

Hill Family 2008 Trust of Arizona and Yvonne Herold, Trustee, Respondents,
v.
Teresa Hill, Appellant.

**APPELLANT'S RETURN TO RESPONDENTS' RENEWED MOTION TO DISMISS
APPEAL**

Appellant Teresa Hill (“Appellant”), proceeding pro se, respectfully submits this Return to Respondents’ Renewed (Second) Motion to Dismiss Appeal, filed July 6, 2026 (the “Motion”). Appellant does not contest the citation deficiencies identified in Respondents’ Exhibit K. She takes responsibility for them, moves to withdraw the Initial Brief, and requests leave to file a corrected brief, with independently verified citations, limited to the issues preserved below. On the remaining grounds, dismissal is not warranted: the operative issues that were present at every level are still matters of law to be appropriately addressed by this court on appeal. Appellant respectfully

asks that the Second Motion to Dismiss filed by Respondents be denied and that the appeal proceed on a corrected record.

I. Section 27-37-130 Does Not Mandate Dismissal of This Consolidated Appeal.

On November 19, 2025, this Court denied Respondents' First Motion to Dismiss and held that consideration of a bond was a motion more properly made to the circuit court. Respondents made that motion to the Charleston County Court of Common Pleas on April 9, 2026, the Circuit Court in the Order of Judge Dale Van Slambrook set a bond of \$265,074.48; Appellant was unable to post it; her motion to reconsider was denied on May 11, 2026; and her petitions for supersedeas were denied by this Court on May 18, 2026, and by the Supreme Court on May 27, 2026. Appellant has since involuntarily vacated the Property at 6209 Savannah Highway, Ravenel, South Carolina, the property built and established by Hill and Hill, LLC and Hill, Hill, and Hill, LLC of which she was a member. The law firms have not been evicted, Appellant still works but cannot get to her files and Respondents have possession of some of Appellants property and the Law Firm's property.

The law firms have not been evicted but the Charleston County Sheriff's Deputies, the Charleston County Magistrates Court, Ravenel Constables (2) and Charleston County Magistrate Sheryl Perry along with the Trust are refusing to allow Appellant to access her business and business assets and belongings. The consequence that S.C. Code Ann. § 27-37-130, Rule 241(b)(10), SCACR, and the April 9 Order attach to the failure to post security — the absence of any stay and the enforcement of the writ of ejectment pending appeal — has been fully carried out against Teresa Hill only. The law firms were a proper and necessary party to the ejectment action and were intentionally omitted by Respondents from the ejectment case.

What the statute does not do is direct this Court to dismiss this appeal. By its terms, § 27-37-130 provides as follows:

“An appeal in an ejectment case will not stay ejectment unless at the time of appealing the tenant shall give an appeal bond as in other civil cases **for an amount to be fixed by the magistrate** and conditioned for the payment of all costs and damages which the landlord may sustain thereby. In the event the tenant shall fail to file the bond herein required within five days after service of the notice of appeal such appeal shall be dismissed by the trial magistrate.” (Emphasis Added.)

Judge Perry did not require a bond by Order because there was no tenancy. Judge Murphy did not require a bond because there was no rental history this no tenancy. Teresa Hill never rented 6209 Savannah Highway from anyone. She helped build and pay for the office at 6209 Savannah Highway. The consequence of failing to post security is enforcement of the judgment pending appeal, which has occurred, not forfeiture of appellate review of the judgment itself.

Whether § 27-37-130 applies to Appellant at all is at issue before this court. Appellant Teresa Hill has maintained throughout these proceedings that she is not a tenant and she has never been a tenant. Her law Firms have never been tenant. Whether the April 9 Order correctly construed the statute to require dismissal of this appeal are questions presented by the appeal from Judge Van Slambrook’s Order, which this Court has consolidated with the first appeal from Judge Perry and Judge Murphy. Dismissing the consolidated appeal on this ground would resolve those questions on motion practice, without briefing, in Respondents’ favor. On November 19, 2025 the Court let the appeal proceed, and now that possession of the building in question has been given by the Court and the entire legal system to Respondents, allowing the appeal to be decided on a complete record works no continuing occupancy-related prejudice to them. It only harms the Appellant and the law firms which were not named in the legal action.

II. Appellant Does Not Contest the Citation Deficiencies in Her Initial Brief; She Accepts Responsibility, and Requests Leave to File a Corrected Brief.

Appellant does not contest that her Initial Brief cited errors. It should not have been filed in that form, and she seeks leave to correct the citations.

Appellant's father has been brutally beaten and injured numerous times during the course of this litigation. These were horrific injuries. If necessary, Appellant can provide photographs of her father. He is an elderly dementia patient. Appellant is her Father's voice, advocate and caregiver. These injuries were brutally horrific for a person of any age and had to be dealt with medically but also legally while Appellant is in the midst of a hateful takedown in this case by people, she believed in the past to be family. As the Court is aware the take down by her family involved Appellants law practice and law building of 37 years. Also, in the middle of all this Appellants business and personal life have been interfered with in an absolutely unconscionable manner which are also being addressed in other courts.

In preparing the Initial Brief under significant time constraints and emotion stress from her Father's injuries, and pressure from the chaos of this eviction action and other nefarious attempts to run the Appellant out of business and out of the area, Appellant used tools to locate supporting authority and incorporated its output into the Brief and used the same tools verifying the citations against the reporters. Appellant offers this account not as justification. There is none. This account is offered to the Court because the Court is entitled to a candid explanation. The failure to verify the authorities from a separate source before filing was Appellant's alone. Appellant has no staff. Appellant has no co-counsel to assist her in the myriad of appeals filed to attempt to save what she has sacrificed to build in the last 36 years. Appellant is solely responsible for the filings in this case.

Appellant apologizes to the Court, and to Respondents and their counsel for her filing. To address the problem directly, Appellant respectfully requests leave to file, a corrected Initial Brief.

The question the Motion to Dismiss presents is not whether the Initial Brief was proper; it was not; but what remedy fits. Striking the withdrawn Brief and permitting a verified, corrected filing addresses the injury the Brief caused: it removes the document, compensates the Court's process with a certification requirement, and preserves decision of the underlying property dispute on its merits. Dismissal, by contrast, would convert Appellant's filing failure into a forfeiture of the appeal itself. Appellant respectfully submits the former is the proportionate course, and she recognizes that any further action concerning this matter rests within the discretion of this Court.

III. The Consolidated Appeal Presents Preserved Issues.

Appellant's initial notice of appeal to the circuit court stated two grounds for the initial appeal: that Appellant was not served with the pleadings, and that the magistrate court lacked jurisdiction because Appellant is not a tenant. Those grounds were before the circuit court at the June 26, 2025 hearing before Judge Maite Murphy, were addressed on the record by both sides, and were decided by the circuit court's July 16, 2025 order. They are preserved for review.

The abandonment authorities Respondents cite address issues inadequately argued in appellate briefs. Here, the two noticed grounds were stated in the notice of appeal as the statute directs and were argued — however imperfectly — by a pro se party participating by telephone after documented technical difficulties reflected in the transcript itself. Whatever the force of those authorities as to other issues, the record does not show abandonment of the two grounds stated in the notice of appeal.

Independently, the consolidated appeal now includes review of the April 9, 2026 and May 11, 2026 Orders. The questions those orders bring before this court is whether § 27-37-130 applies

to Appellant, the procedure by which the Property's rental value was determined, and the amount and consequences of the bond — were litigated in Appellant's February 5, 2026 opposition, at the March 23, 2026 hearing, and in her Rule 59(e), SCRCF motion. Those issues are preserved as to those orders, and the Renewed Motion to Dismiss does not contend otherwise.

IV. Exhibit J Is Not Relevant to Any Ground for Dismissal.

The photograph and video of the Property's condition bear on none of the Motion's three grounds. The condition of the Property is completely disputed, is not the subject of any claim pending before this Court, repairs all of which have been made solely by Appellant which were not documented by Respondents, the Respondents have no knowledge of repairs because the Trust made none and this issue cannot be resolved on a motion to dismiss at the appellate level. Those photos are just one more ugly attempt to disparage Appellant and run her down and out of town. Appellant accordingly does not burden this Court in this Return with a factual reply, and she reserves her response for any proceeding in which her property's condition is actually at issue.

CONCLUSION

Appellant respectfully requests that this Court: (1) deny Respondents' Renewed Motion to Dismiss Appeal; (2) grant Appellant leave to file a corrected Initial Brief limited to the preserved issues and correct her citations; (3) thereafter set a schedule for Respondents' brief which was due the last time on July 6, 2026; and (4) grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Teresa Hill_____

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Date: July 7, 2026

PROOF OF SERVICE

I hereby certify that on July 7, 2026, a true and correct copy of the foregoing Return was served via electronic mail upon counsel for Respondents — Jesse Sanchez, Esq. (jesse@jessesanchezlaw.com); Daniel S. Slotchiver, Esq. (dan@slotchiverlaw.com); and Anna E. Richter, Esq. (arichter@slotchiverlaw.com) — and filed with the Court via email to ctappfilings@sccourts.org.

Teresa Hill

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SC Court of Appeals

July 7, 2026

Via Email ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Motion and Proof of Service
Case: Hill Family Trust of Arizona 2008 vs Teresa Hill
Case No.: 2025-001651

Ms. Kitchings:

In the above-referenced case enclosed you will find for filing a Motion for Reconsideration and Proof of Service for Filing along with Appellant's Return to Respondents' Second Motion to Dismiss and Proof of Service.

If you have any questions regarding this filing, I am available to address those questions.

Respectfully submitted,

Teresa Zachry Hill

Teresa Zachry Hill

CC: Via email only

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