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Aug 31 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**APPEAL FROM DORCHESTER COUNTY
COURT OF COMMON PLEAS**

R. Kirk Griffin, Circuit Court Judge

Case No. 2025CP1802897

Appellate Case No.: 2026-001739

Nelson L. Bruce,

Appellant/Plaintiff,

v.

**Credit Karma, LLC; Intuit Inc.; and
Unknown Does 1–100,**

Respondents/Defendants.

**APPELLANT’S REPLY TO RESPONDENTS’ RETURN TO MOTION AND AFFIDAVIT TO
PROCEED IN FORMA PAUPERIS**

Appellant Nelson L. Bruce, proceeding *pro se*, respectfully presents this Reply pursuant to S.C. App. Ct. R. 240(f) to the Return filed by Respondents Credit Karma, LLC and Intuit Inc. on August 31, 2026, and states as follows:

1. Procedural Service Cured

Appellant acknowledges that, due to an inadvertent oversight, a copy of the Motion and Affidavit to Proceed *In Forma Pauperis* was not contemporaneously served on counsel for Respondents at the time of filing. Concurrently with this Reply, Appellant has formally served true and correct copies of the underlying filed Motion and Affidavit/declaration (see...Exhibit 1) upon counsel for Respondents via electronic mail (email) and First-Class U.S. Mail, as confirmed in the accompanying Certificate of Service.

2. Absence of Prejudice

Respondents have suffered no prejudice from this oversight. Respondents located the Motion on C-Track, had the opportunity to review its contents, and timely submitted a substantive Return on August 31, 2026. Any procedural defect regarding service has now been completely cured.

3. Applicable In Forma Pauperis Standard

Respondents correctly cite *Ex parte Martin*, 321 S.C. 533, 471 S.E.2d 134 (1995), which addresses the waiver of filing fees and costs for an indigent litigant. Martin explains that in-forma-pauperis relief must be authorized by statute or required by a constitutional provision; it does not establish that Appellant's Motion must be denied without judicial consideration of the sworn financial information presented.

Appellant respectfully presents that the Court should consider the Motion and accompanying sworn declaration under the applicable South Carolina procedures governing requests to proceed without prepayment of fees. S.C. App. Ct. R. 240 governs appellate motions.

Appellant's Motion, Affidavit, and Declaration provide the financial facts necessary for the Court to determine whether the requested relief is authorized and warranted in this case. Appellant therefore respectfully requests that the Court decide the Motion on the merits rather than deny it solely because proof of service was not included with the original filing.

4. Sufficiency of Filed Sworn Affidavit and Declaration

Appellant's previously filed Affidavit and supporting declaration fully details Appellant's income, monthly necessary living expenses, liabilities, and assets. The sworn financial data in the record demonstrates that Appellant lacks sufficient disposable funds to pay the required

appellate filing fees and costs without being deprived of basic life necessities. Appellant respectfully requests that the Court evaluate his entitlement based upon the detailed financial disclosures set forth under oath in that Affidavit and the supporting declaration.

WHEREFORE, Appellant respectfully requests that this Court:

- (a) Deem the procedural omission regarding service cured;
- (b) Consider the Motion and Affidavit to Proceed *In Forma Pauperis* on the merits;
- (c) Grant Appellant leave to proceed *in forma pauperis*; and
- (d) Grant such other and further relief as the Court deems just and proper.

Respectfully presented,

Date: August 31, 2026

/s/ Nelson L. Bruce
Nelson L. Bruce, Plaintiff/Appellant
144 Pavilion Street, Summerville, South Carolina 29483
Telephone: (843) 437-7901
Email: leonbruce81@yahoo.com

CERTIFICATE OF SERVICE

I, Nelson L. Bruce, hereby certify that on August 31, 2026, I served true and correct copies of:

1. Appellant's Reply to Respondents' Return to Motion and Affidavit to Proceed *In Forma Pauperis*; and
2. Appellant's filed Motion and Affidavit to Proceed *In Forma Pauperis* (with all supporting exhibits and affidavits/declarations). See...Exhibit 1

upon counsel of record for Respondents Credit Karma, LLC and Intuit Inc. via electronic mail

(email) and by depositing copies in the United States Mail, First-Class postage prepaid,

addressed as follows:

Carmen V. Ganjehsani
Richardson, Plowden & Robinson, P.A.
1900 Barnwell Street
Post Office Drawer 7788
Columbia, South Carolina 29202
Email: cganjehsani@richardsonplowden.com

Drew Hamilton Butler
Richardson, Plowden & Robinson, P.A.
235 Magrath Darby Boulevard, Suite 100
Mount Pleasant, South Carolina 29464
Email: dbutler@richardsonplowden.com

Date: August 31, 2026

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/s/ Nelson L. Bruce
Nelson L. Bruce, Plaintiff/Appellant
144 Pavilion Street, Summerville, South Carolina 29483
Telephone: (843) 437-7901
Email: leonbruce81@yahoo.com

EXHIBIT 1

Appellant's filed Motion and Affidavit to Proceed In Forma Pauperis (
with all supporting exhibits and affidavits/declarations

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Respondent/Defendant.

FINANCIAL DECLARATION OF APPELLANT

I, Nelson L. Bruce, declare the following financial information to be true, accurate, and complete to the best of my knowledge:

I. MONTHLY INCOME

Gross Monthly Income (Average past 4–6 months): \$150.00

TOTAL MONTHLY INCOME: \$150.00

II. MONTHLY HOUSEHOLD EXPENSES

1. Electricity/Light Bill: \$140.00
2. Water Bill: \$37.00
3. Sewer Bill: \$66.15
4. Cell Phone: \$25.00
5. Medical Insurance: \$93.00
6. Car Operating Expenses (Insurance, gas, maintenance): \$444.00

TOTAL MONTHLY EXPENSES: \$805.15

NET MONTHLY INCOME (Income minus Expenses): -\$665.15

III. ASSETS

1. Real Estate / Primary Residence: \$0.00*
(*Note: Property is subject to an alleged and actively challenged mortgage/foreclosure proceeding; current equity is disputed/none.)
2. Personal Vehicles: \$75.00 (Estimated value of vehicle is between \$50.00 and \$100.00)
3. Cash / Bank Accounts: \$1,600

TOTAL ASSETS: \$75.00

IV. DEBTS & LIABILITIES

1. Unsecured Credit Card Debt (\$48,000 total): \$1,300 monthly
 2. Disputed Mortgage Debt (Pending Foreclosure): \$300,000.00 (Alleged and challenged)
- TOTAL DEBTS: \$345,000.00+

I hereby swear or affirm under penalty of law of the United States of America that the foregoing financial statement completely and accurately reflects my current financial condition.

Date: August 19th, 2026



Nelson L. Bruce, Plaintiff/Appellant
144 Pavilion Street
Summerville, South Carolina 29483
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MOTION AND AFFIDAVIT TO PROCEED IN FORMA PAUPERIS

The Appellant, Nelson L. Bruce, respectfully moves this Court pursuant to the South Carolina Appellate Court Rules for an Order waiving the required \$250 appellate filing fee and allowing Appellant to proceed in forma pauperis on the grounds that Appellant is indigent and unable to pay the costs of this appeal.

In support of this motion, Appellant presents the following affidavit:

1. I am the Appellant in this matter and I deeply believe I have a meritorious appeal.
2. Due to my poverty and financial hardship, I am unable to pay the \$250 filing fee to initiate this appeal.
3. I have attached a full and complete Financial Declaration detailing my current monthly income, assets, debts, and household expenses.
4. I request that this Court waive the filing fee so that I am not denied access to justice due to an inability to pay.

I, Nelson L. Bruce, do hereby attest, swear and affirm under penalty of law of the United States of America that the foregoing statements and the attached financial information are true, accurate, and complete to the best of my knowledge.

Date: August 19th, 2026



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144 Pavilion Street
Summerville, South Carolina 29483
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Email: leonbruce81@yahoo.com