

IN THE APPEALS COURT OF SOUTH CAROLINA
Nationstar Mortgage, LLC d/b/a Mr. Cooper, Respondent

v.

Carolyn Brantley(2), Petitioner, Appellant
Appellate Case No. 2025-002464

RECEIVED

Sep 08 2026

The Honorable Carmen T. Mullen
Jasper County Trial Court Case No. 2022CP2700306
James A. Grimsley III, special referee

SC Court of Appeals

RESPONSE TO SEPTEMBER 3, 2026 DEFICIENCY LETTER AND
NOTICE OF CLARIFICATION OF FILINGS

COMES NOW Carolyn Brantley, a natural woman appearing Sui Juris, in her own right and capacity, and as Grantor and General Executor of the Carolyn Brantley Estate, without waiver of any constitutional, jurisdictional, equitable, procedural, substantive, or other rights, and respectfully submits this Response to the Court's Deficiency Letter dated September 3, 2026, together with this Notice of Clarification of Filings.

I. PRELIMINARY NOTICE AND PURPOSE OF THIS FILING

1. On or about September 3, 2026, the South Carolina Court of Appeals issued correspondence to Carolyn Brantley concerning the above-captioned matter.
2. The correspondence states that, upon reviewing Appellant's "brief and affidavit claim of service," the Court construes those filings as a motion for an extension of time.
3. The correspondence further identifies a deficiency concerning a filing fee in the amount of Fifty Dollars (\$50.00) and states that the deficiency must be corrected within ten (10) days or the matter may be dismissed.
4. Carolyn Brantley respectfully submits this Response to clarify the nature, purpose, and distinction between the documents transmitted to the Court.
5. This Response is not intended to create unnecessary controversy with the Court, but rather to ensure that the appellate record accurately reflects the actual instruments submitted and the purposes for which they were prepared.
6. The documents referenced by the Court were separate documents, separately titled, separately organized, and submitted for materially different purposes.
7. Accordingly, Appellant respectfully requests that each filing be recognized and addressed according to its actual title, content, purpose, and request for relief.

II. THE APPELLANT'S BRIEF EXPRESSLY REQUESTED LEAVE TO FILE OUT OF TIME

8. One of the documents submitted by Carolyn Brantley was entitled:

ENTRY BY SPECIAL APPEARANCE, APPELLANT'S BRIEF IN SUPPORT OF LEAVE TO FILE OUT OF TIME, NOTICE OF FRAUD UPON THE COURT, AFFIDAVIT IN SUPPORT AND DEMAND FOR CONSTITUTIONAL REVIEW.

9. The title and substance of that document expressly demonstrate that it included a request for leave to file appellate materials out of time.

10. Within that filing, Appellant specifically requested that the Court:

- a. Grant leave to file appellate materials out of time;
- b. Preserve the status quo pending review;
- c. Require preservation of records and evidence relevant to the chain of title and underlying proceedings;
- d. Conduct such constitutional and equitable review as justice requires;
- e. Consider allegations concerning fraud upon the court and procedural irregularities affecting the integrity of the proceedings; and
- f. Award such other relief as the Court deems just, equitable, and proper.

11. Therefore, Appellant does not dispute that her Brief contained a substantive request for leave to file out of time.

12. However, that fact does not alter the separate and independent character of the additional Affidavit Claim of Service submitted with or in connection with the appellate materials.

III. THE AFFIDAVIT CLAIM OF SERVICE WAS A SEPARATE AND DISTINCT INSTRUMENT

13. Carolyn Brantley separately prepared and submitted a document expressly entitled:

AFFIDAVIT CLAIM OF SERVICE (Electronic Service and Notice of Knowledge).

14. The Affidavit Claim of Service was not captioned as a motion for an extension of time.

15. The Affidavit Claim of Service did not request an enlargement of time.

16. The Affidavit Claim of Service did not independently request leave to file out of time.

17. The Affidavit Claim of Service did not ask the Court to suspend, enlarge, modify, or extend any appellate deadline.

18. Instead, the Affidavit expressly identified its purpose as establishing the record concerning electronic service and notice.

19. The Affidavit specifically identified:

- a. The identity and capacity of the Affiant;
- b. The purpose for which the Affidavit was made;
- c. The authority asserted in support of electronic filing and service;
- d. The persons and offices served;
- e. The documents electronically transmitted;
- f. Notice and knowledge resulting from the electronic transmission;
- g. The good-faith nature of the Affidavit; and
- h. The reservation of all rights.

20. The Affidavit expressly states that it was executed for the purpose of establishing a record of electronic service upon persons entitled to notice.

21. It further states that it was intended to constitute evidence that the identified documents were electronically transmitted to the recipients listed therein.

22. Accordingly, the Affidavit Claim of Service was a sworn evidentiary instrument concerning service and notice.

23. Respectfully, it should not independently be characterized as a motion for an extension of time where no such relief was requested within that document.

IV. REQUEST FOR ACCURATE CHARACTERIZATION OF THE FILINGS

24. Appellant respectfully recognizes the authority of this Court to review filings and determine their procedural treatment according to applicable law and rules.
25. At the same time, Appellant respectfully requests that the Court preserve the distinction between separate instruments that were intentionally prepared for different purposes.
26. The Appellant's Brief contained substantive requests for relief, including leave to file out of time.
27. The Affidavit Claim of Service served the distinct purpose of establishing electronic service and notice.
28. The two documents should therefore not be treated as though they are one and the same instrument.
29. Nor should the Affidavit Claim of Service be transformed into a request for relief that it does not contain.
30. Accurate characterization is particularly important where procedural consequences, including the possibility of dismissal, may follow from the classification assigned to a filing.
31. Appellant respectfully requests that the record reflect the actual nature of each filing as submitted.

V. APPELLANT APPEARS SUI JURIS AND REQUESTS EQUAL PROCEDURAL FAIRNESS

32. Carolyn Brantley appears Sui Juris, in her own right and capacity.
33. Appellant does not seek preferential treatment, exemption from lawful procedural requirements, or any special status before this Court.
34. Appellant respectfully seeks the equal and even-handed application of procedural standards.
35. Where a litigant is expected to comply with procedural requirements, fundamental fairness likewise requires that the litigant's filings be evaluated according to their actual content and stated purpose.
36. Appellant respectfully submits that a filing should not be involuntarily transformed into a different legal instrument when the document itself clearly identifies its nature and purpose.
37. The fact that Appellant is not represented by licensed counsel should not diminish the importance of accurately preserving the record.
38. If the Court expects strict compliance with filing requirements, deadlines, titles, procedural rules, and substantive standards, Appellant respectfully requests corresponding precision in the Court's characterization of the documents she actually submitted.
39. This request is made respectfully and in good faith.
40. Appellant seeks no privilege beyond the law, but respectfully requests that she not be subjected to procedural consequences arising from a characterization she did not make and which the document itself does not support.

VI. THE COURT'S CHARACTERIZATION SHOULD BE CLARIFIED

41. Appellant respectfully requests clarification of the statement that the Court construes the "brief and affidavit claim of service" as a motion for an extension of time.
42. Appellant respectfully acknowledges that her Brief contains a request for leave to file out of time.
43. However, Appellant respectfully requests confirmation that the separate Affidavit Claim of Service will remain recognized as an affidavit concerning electronic service and notice rather than as an independent motion for an extension of time.
44. Such clarification will assist Appellant in understanding the precise procedural posture of the appeal and in responding appropriately to any legitimate deficiency identified by the Court.

VII. PRESERVATION OF SUBSTANTIVE POSITIONS

45. This Response does not withdraw, abandon, waive, or concede any substantive matter raised in Appellant's previously submitted Brief.
46. Appellant continues to preserve all previously asserted concerns and claims, including those relating to:
 - a. Constitutional due process;
 - b. Adequacy and timing of notice;
 - c. Meaningful opportunity to be heard;
 - d. Property interests;
 - e. Estate interests;
 - f. Standing;
 - g. Authority;
 - h. Chain-of-title concerns;
 - i. Preservation of evidence and records;
 - j. Procedural irregularities;
 - k. Equitable review; and
 - l. Allegations concerning fraud upon the court.
47. Nothing contained herein shall be construed as consent to waiver of any constitutional, statutory, equitable, procedural, jurisdictional, or substantive right.

VIII. GOOD-FAITH PURPOSE

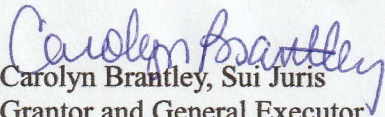
48. This Response is submitted in good faith and for the purpose of clarifying the appellate record.
49. Appellant does not submit this Response for purposes of delay, harassment, obstruction, or improper advantage.
50. Rather, Appellant seeks to avoid confusion regarding the separate nature of the documents previously transmitted.
51. Because the September 3, 2026 correspondence identifies a potential dismissal if a deficiency is not corrected, Appellant respectfully believes that clarification of the exact nature and procedural treatment of the filings is both appropriate and necessary.

WHEREFORE, PREMISES CONSIDERED, Carolyn Brantley, appearing Sui Juris, respectfully requests that this Honorable Court:

- A. Recognize and preserve the distinction between the separate documents previously submitted;
- B. Recognize that the Appellant's Brief included a request for leave to file appellate materials out of time;
- C. Recognize that the separately submitted Affidavit Claim of Service was not an independent motion for an extension of time;
- D. Recognize the Affidavit Claim of Service according to its stated purpose as evidence concerning electronic service and notice;
- E. Clarify the procedural characterization of each document referenced in the September 3, 2026 correspondence;
- F. Permit Appellant a meaningful opportunity to cure any properly identified procedural deficiency;
- G. Refrain from dismissal based upon confusion or uncertainty concerning the characterization of separate filings;
- H. Preserve Appellant's substantive claims and arguments without prejudice; and
- I. Grant such other and further relief as this Honorable Court deems just, equitable, and proper.

Further Affiant and Appellant sayeth not.

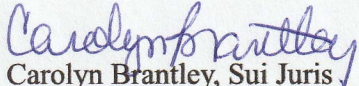
Respectfully submitted this 8th day of September, 2026.


Carolyn Brantley, Sui Juris
Grantor and General Executor
Carolyn Brantley Estate
Appellant
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Ridgeland, South Carolina 29936
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Email: cbran211@gmail.com

VERIFICATION

I, Carolyn Brantley, being competent to testify and having personal knowledge of the matters stated herein, declare that the factual statements contained in this Response are true and correct to the best of my personal knowledge and belief.

Executed this 8th day of September, 2026.



Carolyn Brantley, Sui Juris
Appellant and Affiant

CERTIFICATE OF SERVICE

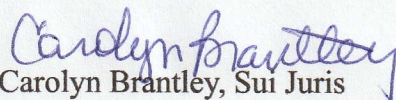
I hereby certify that on the 8th day of September, 2026, a true and correct copy of the foregoing Response to September 3, 2026 Deficiency Letter and Notice of Clarification of Filings was served upon the appropriate parties and counsel of record by electronic mail and/or other authorized means.

Service was directed to:

Thomas A. Shook, Esquire
ashook@cobbhammett.com
ashook@finkellaw.com

Judge Carmen T. Mullen
Jasper County

James A. Grimsley III
Special Referee


Carolyn Brantley, Sui Juris