

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
J. C. Nicholson, Jr., Circuit Court Judge
Case No.: 2009-CP-10-6873

Justin O'Toole Lucey, Justin O'Toole Lucey, P.A., Respondents,

v.

Amy Meyer, Petitioner.

And Lorcan Lucey, GMAC Mortgage
Corporation, Citimortgage, Inc., and John
Doe Finance,

Third Party Defendants.

RETURN TO NOTICE OF BANKRUPTCY BY THIRD PARTY DEFENDANT

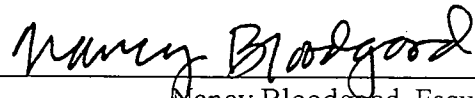
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S.C. SUPREME COURT

Nancy Bloodgood, Esquire
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Attorneys for Petitioner

Third Party Defendant GMAC Mortgage, LLC (incorrectly named as GMAC Mortgage Corporation) has filed a Notice of Bankruptcy filing in this matter. Petitioner does not dispute that a constructive trust is not a permitted claim and is, thus, subject to an automatic stay as to Third Party Defendant GMAC Mortgage, LLC (incorrectly named as GMAC Mortgage Corporation). However, this Third Party Defendant has never filed any briefs in this case and the appeal can fully proceed without it. Therefore, Petitioner respectfully requests the appeal to be stayed only as to this Third Party Defendant.



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v.

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PROOF OF SERVICE FOR RETURN TO NOTICE OF BANKRUPTCY

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(843) 972-0313
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I, Nancy Bloodgood, Esquire, certify that on 3/17/14, I served a copy of the **Return To Notice of Bankruptcy** via First Class Mail by placing a copy of said documents in the United States mail with sufficient postage thereon to the following:


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The Honorable Daniel Shearouse
Clerk, South Carolina Supreme Court
Post Office Box 11330
Columbia, SC 29211



Nancy Bloodgood, Esquire