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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2012-213397

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.

**RESPONDENTS JUSTIN O'TOOLE LUCEY AND JUSTIN O'TOOLE LUCEY,
P.A.'S RETURN IN RESPONSE TO THIRD-PARTY DEFENDANT GMAC
MORTGAGE, LLC'S NOTICE OF BANKRUPTCY FILING AND
SUPPLEMENTAL SERVICING ORDER**

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Attorneys for the Respondents

Respondents Justin O'Toole Lucey and Justin O'Toole Lucey, P.A., file this Return in response to Third-Party Defendant GMAC Mortgage, LLC's Notice of Bankruptcy Filing and Supplemental Servicing Order. Respondents concur with the position of Petitioner Amy Meyer, as set forth in the Return filed by Ms. Meyer, that Third-Party Defendant GMAC Mortgage, LLC has not filed any briefs in this case and the appeal can fully proceed without it, as the issues on appeal involve only Petitioner and Respondents Justin O'Toole Lucey and Justin O'Toole Lucey, P.A. Thus, Respondents Justin O'Toole Lucey and Justin O'Toole Lucey, P.A. request that any stay issued as a result of Third-Party Defendant GMAC Mortgage, LLC's Notice of Bankruptcy be issued only as to such Third-Party Defendant.

Respectfully submitted:

NEXSEN PRUET, LLC

By: 

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March 21, 2014

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable J.C. Nicholson, Jr., Circuit Judge

Appellate Case No. 2010-164286

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.

PROOF OF SERVICE

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I, Cherie W. Blackburn, Esquire, hereby certify that on the 21st of March, 2014, I served a copy of the **RESPONDENTS JUSTIN O'TOOLE LUCEY AND JUSTIN O'TOOLE LUCEY, P.A.'S RETURN IN RESPONSE TO THIRD-PARTY DEFENDANT GMAC MORTGAGE, LLC'S NOTICE OF BANKRUPTCY FILING AND SUPPLEMENTAL SERVICING ORDER** submitted by the Respondents, Justin O'Toole Lucey and Justin O'Toole Lucey, P.A., on counsel for the Petitioner and the Third-Party Defendants via United States Mail, postage pre-paid, and addressed as follows:

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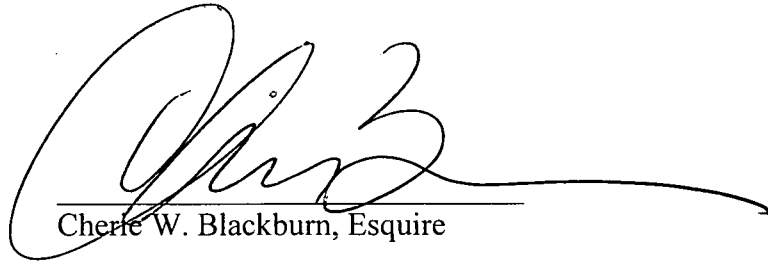
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For the Third Party Defendant, GMAC Mortgage Corporation

The Honorable Jenny Abbott Kitchings
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