

**EXHIBIT A**

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS  
C/A 2007-CP-40-5475

Wells Fargo Bank NA, et al.

Plaintiff(s),

Vs.

Allen Hancock Sloan

Defendant(s)

2013 AUG - 8 AM 9:26  
JENNIFER W. HENDERSON  
C.C.P. & G.S.

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FILED

ORDER VACATING JUDGMENT AND SALE AND SATISFYING LIEN PURSUANT TO

RULE 11, S.C.R.CIV.P.

On July 8, 2013 at 11:00 a.m. this Court required the parties to appear for a Status Conference scheduled by the Master in Equity for Richland County regarding the improper foreclosure of 8114 Monticello Road, Columbia, SC in Richland County on June 3, 2013. Counsel for the Plaintiff and Defendant attended the hearing. The undisputed facts presented at the hearing, along with the pleadings of record are as follows:

1. On August 17, 2007 Plaintiff initiated foreclosure, which was stayed by Defendant's bankruptcy filing on December 11, 2007, case number 07-06870-hb ("Bankruptcy").
2. Defendant provided notice of the bankruptcy to Plaintiff and Plaintiff's counsel in the foreclosure, Heidi Carey at the Weston Adams Law Firm.
3. On January 8, 2008, Plaintiff's counsel, William S. Koehler of Weston Adams Law Firm, appeared in this case and filed a proof of claim in the amount of \$40,565.29.
4. On December 11, 2007, Defendant filed a plan of reorganization proposing to pay the claim in full at 8.5% interest.
5. On January 9, 2008, Plaintiff, through its counsel, filed its Objection to the Plan.
6. On February 15, 2008, Plaintiff withdrew its objection indicating the parties had resolved the matter.

7. On April 23, 2008, Defendant filed an Amended Plan in the Bankruptcy providing for payment in full to the Plaintiff over the life of the plan with annual fixed interest of 13.625%.
8. On July 14, 2008, Plaintiff filed an Assignment of Claim transferring its claim to American Home Mortgage Servicing, Inc.
9. On November 2, 2012, the Chapter 13 Trustee filed his report of Plan Completion indicating the Debtor had made all the required payments under the Chapter 13 Plan. This would have included payment of Plaintiff's proof of claim.
10. On November 13, 2012, Defendant filed its Certification of Plan Completion and Request for Discharge which was served upon Plaintiff and its counsel.
11. On December 4, 2012, the Court entered its order discharging the Debtor, which was served upon Plaintiff and its counsel.
12. On December 14, 2012, the Court closed the case and provided CM/ECF notice to Plaintiff's counsel.
13. After the filing of the discharge, Defendant received collection letters on the account, replied by telephone mostly to foreign representatives believed to be Plaintiff's agents and was told that he had a zero balance and not to worry.
14. Upon representation of counsel, thereafter, Plaintiff sent its counsel an email stating the case had been dismissed and instructing counsel to proceed with foreclosure.
15. Counsel was without knowledge to explain why it listened to Plaintiff's instructions without verifying the information, but on or about May 15, 2013, notwithstanding the bankruptcy discharge or having received payment in full, Plaintiff through its counsel incorrectly proceeded to instruct the court to resume the foreclosure proceedings.
16. On or about June 3, 2013, the property was sold at foreclosure sale to a third party bidder.

17. Thereafter, the successful bidder contacted Defendant directly through a note in his fence informing him he purchased the property and threatened eviction.

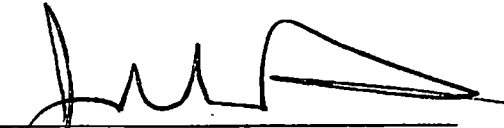
18. Defendant thereafter contacted his counsel regarding the sale. Since that time, his bankruptcy counsel, Jane H. Downey and her staff have spent approximately 6 hours on this matter. Her hourly rate is \$350. She is a certified specialist in bankruptcy and debtor-creditor law with almost 23 years of legal experience. Her assistant of 7 years, Jessica Nystrom is a Certified Bankruptcy Assistant through the Association of Bankruptcy Judicial Assistants bills at a rate of \$130 per hour. Defendant's foreclosure lawyer, Natalie Quinn has 9 years of experience and bills at a rate of \$200.00. She has approximately 4 hours of time on this matter.

WHEREFORE, pursuant to Rule 11, S.C.R.Civ.P., this court finds that the foreclosure sale on June 3, 2013 is hereby vacated, that the lien of Plaintiff or its assignees or servicers on the property located at 8114 Monticello Road, Columbia, SC is satisfied, that any debt Plaintiff claims Defendant owes to Plaintiff has been paid in full and satisfied such that Defendant owes no money to Plaintiff and Plaintiff shall be restrained from continuing any collection attempts, and that counsel for Plaintiff shall pay \$2,500 in attorneys fees to Jane H. Downey payable to the law firm of Moore Taylor & Thomas and \$800.00 to Natalie Quinn, payable to the law firm of Quinn and Quinn within 10 days of the date of this order.

AND IT IS SO ORDERED.

Columbia, South Carolina

August 8, 2013

  
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Joseph M. Strickland  
Master in Equity