

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY **SC Court of Appeals**

Joseph M. Strickland, Master in Equity

Case No. 2014-000140

Bank of America, N.A., Respondent

v.

Duce Staley, Felicia Woods a/k/a Felicia B. Woods, SCBT, N.A., South Carolina Department of Revenue, Palmetto Health, Manheim Automotive Financial Services, Inc., and Spring Valley Homeowners' Association,Defendants

And Willie Zimmerman, Third Party Participant,Appellant

**RETURN TO RESPONDENT'S SECOND
MOTION TO DISMISS FOR FAILURE TO
COMPLY WITH RULE 211(b), SCACR**

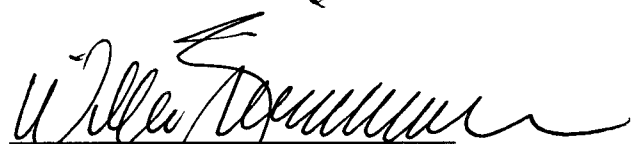
Appellant now replies to the Respondent's Second Motion to Dismiss for Failure to Comply with Rule 211(b), SCACR, dated February 26, 2015 with a Proof of Service date and US Postmark date of the same. The Appellant contends that this motion lacks merit and is frivolous in addressing minor changes that are allowed by Rule 211(b), SCACR or are so minor that the changes in no way changes the initial brief entered.

Appellant put forth the rule allows for grammatical changes and the changes made were minor and does not affect the content nor legal weight of the brief. Respondent does not want the proceedings to move forward and is pursuing arguments that are neither substantive nor procedural to the context of the appeal.

If deemed necessary, appellant can resubmit final brief that if absolutely identical to initial brief to move the process forward. Appellant puts forth that re-submitting is not necessary because appellant has fully complied with aforementioned rule and respondent's second motion to dismiss should be denied.

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
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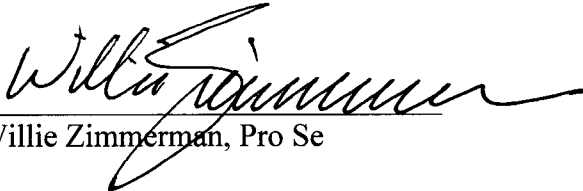
v.

Duce Staley, Felicia Woods a/k/a Felicia B. Woods, SCBT, N.A., South Carolina Department of Revenue, Palmetto Health, Manheim Automotive Financial Services, Inc., and Spring Valley Homeowners' Association, Defendants,

And Willie Zimmerman, Third Party Participant,Appellant

PROOF OF SERVICE

I, Willie Zimmerman, served upon the Respondent this RETURN TO RESPONDENT'S SECOND MOTION TO DISMISS FOR FAILURE TO COMPLY WITH RUL 211(b), SCACR by placing the same in the United States Mail, first class postage prepaid, addressed to the following as shown this 9th day of March, 2015.


Willie Zimmerman, Pro Se