

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
AUG 07 2012

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

SC Court of Appeals

Ellis B. Drew, Jr., Master in Equity

Case No.: 2010-CP-04-03548

Green Tree Servicing, LLC, etcRespondent,

Corrie A. Martin..... Appellant.

REPLY TO RESPONDENT'S MOTION TO DISMISS

Proof of Service

I, Appellant Corrie Martin, hereby state that on April 16, 2012 I mailed a copy of my Request for Transcript to the Court Administration.

I, Appellant Corrie Martin, hereby state that June 20, 2012 I mailed a Proof of Service of the Request for Transcript to the Court Administration on June 20, 2012.

I, Appellant Corrie Martin, hereby state that on June 20, 2012 I mailed a copy of the Request for Transcript and a copy of the Proof of Service of the Request for Transcript by placing the same in an envelope addressed to either Attorney B. Lindsay Crawford or to Attorney Theodore von Keller, who are in the same law firm and have offices at the same address, to their address known to me as

Post Office Box 4216
Columbia, South Carolina 29240

and depositing the same in the United States mail.

I, Appellant Corrie A. Martin, further state that I neither prepared nor mailed a certificate or affidavit concerning my depositing into the United States Mail on June 20, 2012 a copy of the Request for Transcript and a copy of the Proof of Service for the Request for Transcript which in fact I did mail to B. Lindsay Crawford and Theodore von Keller at the same time that I mailed the copies thereof to the Court Administration.

The SCACR do not require an affidavit to be prepared or served which states that a Proof of Service relating to a Proof of Service for a Request for Transcript and a Proof of Service relating to a Proof of Service for the Request for Transcript must be served upon Respondent's attorneys.

Motion of Attorney Gaines to be Relieved as Counsel According to copies of correspondence received by me, Appellant Corrie Martin, Attorney Andrew Gaines did file a Motion to be Relieved as Counsel with the Court of Appeals. I, Corrie A. Martin, believe that Attorney Andrew Gaines did serve a copy of his Motion to be Relieved as Counsel upon the Respondent's attorneys as well as file his Motion to be Relieved as Counsel with the Court of Appeals.

The filing of and the service of a Motion to be Relieved as Counsel is the responsibility of Attorney Andrew Gaines. If Respondent's attorneys have not received a copy of the Motion to be Relieved as Counsel, then these circumstances are within the knowledge of Attorney Andrew Gaines. I, Corrie Martin, have no personal

information, other than hearsay information, that Attorney Andrew Gaines complied with the SCACR. I, Corrie Martin, believe that Attorney Andrew Gaines complied with the law.

Final Brief and Record Filed Early Respondent has presented no facts which show any prejudice to the Respondent or that any error exists or that any inconvenience is placed upon the Respondent by Appellant filing her Final Brief and Record a few days early. The SCACR provide that "within thirty days" and "within twenty days" the Final Brief and Record will be served.

Finally For the reasons expressed above, the Respondent's Motion to Dismiss should be dismissed.

August 2, 2012



Corrie Ann Martin
Appellant
Post Office Box 14042
Anderson, S C ~~29624~~ **29624**
864-716-9926

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS
THIRTEENTH JUDICIAL CIRCUIT

COUNTY OF ANDERSON)

CORRIE A. MARTIN)

C.A. # 2010-CP-04-03548

Plaintiff,)

vs.)

GREEN TREE SERVICING, LLC, as
Successor in Interest to Green Tree
Financial Serving Corporation,)

AFFIDAVIT OF SERVICE

RECEIVED

AUG 07 2012

Defendant.)

SC Court of Appeals

PERSONALLY APPEARED before me, Corrie A. Martin, who after being duly sworn states that she served Theodore von Keller, attorney for the Respondent, with a copy of a Reply to Respondent's Motion to Dismiss by placing a copy thereof in an envelope addressed to

Theodore von Keller, Esquire
Crawford & Keller
Post Office Box 4216
Columbia, SC 29240

and depositing such envelope in the United States mail with proper postage on August 2, 2012

Corrie A. Martin

Corrie A. Martin

SWORN TO before me on this
2nd day of August, 2012

[Signature]

Notary Public for South Carolina

My Commission expires on 03/16/2019