

TYLER, JACKSON, PEACE & SILVER, LLC

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November 16, 2015

Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals Clerk of Court
1220 Senate Street
P.O. Box 11629
Columbia, South Carolina 29211

Letha Johnson
528 Jones Bride Road
Blackville, South Carolina 29817

RECEIVED
NOV 20 2015
SC Court of Appeals

Re: Green Tree Servicing, LLC v. Letha Johnson
Appellate Case No. 2015-002075

Dear Ms. Kitchings,

Despite Ms. Johnson's assertions, a hearing on Respondent Green Tree Servicing, LLC's ("Green Tree") Motion for Summary Judgment ("Motion") occurred on July 13, 2015 ("Hearing Date") before the Honorable J. Mark Hayes, II at 2:00 PM, and Ms. Johnson was provided a Notice of Hearing that was served on her on June 17, 2015. I have enclosed a copy of the Notice of Hearing herewith. The hearing on the Motion, which I attended, was Number 10 on the Non-Jury Motions Roster. The Non-Jury Motions Roster is enclosed herewith as well. On July 8, 2015, Ms. Johnson filed a Request for Reschedule ("Request") stating that she had pre-arrangements that could not be changed. The Request does not contain any other explanation or details for the reschedule but only states that pre-arrangements had been made by Ms. Johnson. The Request is also enclosed.

On the Hearing Date, Judge Hayes denied Ms. Johnson's Request and heard Green Tree's Motion. Based on the evidence presented, argument of counsel and Ms. Johnson's failure to appear and put forth a defense, Judge Hayes granted the Motion that resulted in the issuance of the Order on Motion for Summary Judgment for Repossession and Writ of Assistance ("Order") that was served on Ms. Johnson. Also, a record of the hearing was taken by the court reporter in attendance, Brenda W. Sigwald.

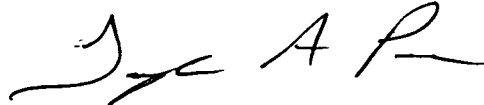
Accordingly, Green Tree takes the position that a transcript of the hearing on the Motion can be produced. Green Tree additionally takes the position that Ms. Johnson should be required

to produce the transcript of the hearing on the Motion as same is necessary to this matter. If Ms. Johnson cannot or is unwilling to request the transcript, Green Tree will file a Motion to Dismiss shortly based on various procedural and substantive grounds.

If you have any questions or concerns, please feel free to contact me. I look forward to hearing from you.

Sincerely,

TYLER, JACKSON, PEACE & SILVER, LLC

A handwritten signature in black ink, appearing to read 'TAP', written over the printed name of Taylor A. Peace.

Taylor A. Peace
tpeace@tjpslaw.com

TAP/rf
Enclosures

In Propria Persona
Johnson, Letha
528 Jones Bridge Rd
Blackville, SC 29817

RECEIVED
NOV 20 2015
SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF BARNWELL

C/A NO.: 2015-CP-06-00006

Green Tree Servicing LLC,

Plaintiff,

Vs.

REQUEST FOR RESCHEDULE

Letha Johnson,

Defendant,

REQUEST FOR RESCHEDULE

FILED FOR RECORD
2015 JUL -8 AM 11:30
SHIRLEY S. STEVENSON
CLERK OF COURT
BARNWELL COUNTY, S.C.

I, Johnson, Letha, a living, breathing, self-aware woman am requesting that the hearing date be rescheduled to a later date because I have already had prearrangements for that date that cannot be changed at this time and I would like to be present for any hearing that is concerning my Mortgage. Thank you for your consideration.

By: John Letha
Johnson, Letha UCC 1-207/1-308
528 Jones Bridge Rd
Blackville, SC 29817

July 8th 2015
Date

Shelby

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF BARNWELL

C/A NO.: 2015-CP-06-00006

Green Tree Servicing LLC,

RECEIVED

Plaintiff,

NOV 20 2015

Vs.

SC Court of Appeals

Letha Johnson,

Defendant,

FILED FOR RECORD
2015 JUL -8 AM 11:30
HONORABLE JUDGE
CLARENCE
BARNWELL COUNTY, S.C.

PROOF OF SERVICE

I, Johnson, Letha certify that I am of such age and discretion to be competent to serve papers.

That on the 8 day of July, 2015, I have served a copy of the documents listed below, by Certified Mail, sent to each of the following persons at the locations stated below, which is the last known location, and by depositing said envelope and contents in the U.S Mail.

Documents: -Request for Reschedule
 -Proof of Service

Party(ies) Served:

Jeffrey L. Silver, Esquire
South Carolina Bar No. 5104
TYLER, CASSELL, JACKSON, PEACE & SILVER, LLC
1331 Elmwood Avenue, Suite 300
Columbia, SC 29211
Phone: (803) 252-7689

By: *Letha Johnson*
Johnson, Letha UCC 1-207/1-308
528 Jones Bridge Rd
Blackville, SC 29817

July 8th 2015
Date

**Barnwell County Second Judicial Circuit - Roster Details
Motion Roster for Monday, July 13, 2015 @ 2:00 p.m.**

Court/Agency	Common Pleas	Judge	Hayes	Roster Id	41
Roster Type	Motion Roster	Roster Begin Date	07/13/2015	Roster End Date	07/16/2015

Number of motions = 24

#	Date	Time	hr:mn	Description	Filing Party	Filed Date	Case	Sub Type	Plaintiff Attorney	Defendant Attorney	Notes
1	07/13/2015	2:00 PM	0:15	Motion to Amend 3rd Party Complaint	Fred's Inc Et Al-DEF	11/03/2014	2010CP0600101 Martha M Et Al Fountain , plaintiff, et al VS Fred's Inc Et Al , defendant, et al	Personal Injury 350	Mark David Ball (803) 943-2111 R. Steven Chandler (803) 245-1800	O. Carlisle Edwards Jr. (843) 576-2900 Matthew Clark LaFave (803) 724-5727 Regina Hollins Lewis (803) 790-8838 Peden Brown McLeod Jr. (843) 329-9500 Morgan S. Templeton (843) 329-9500	Order for Continuance and Scheduling Order (7/2/15)
2	07/13/2015	2:00 PM	0:15	Tippins Polk's Motion/Compel the Prod of Docs Subpoena	Tippins Polk Construction Inc-DEF	11/03/2014	2010CP0600101 Martha M Et Al Fountain , plaintiff, et al VS Fred's Inc Et Al , defendant, et al	Personal Injury 350	Mark David Ball (803) 943-2111 R. Steven Chandler (803) 245-1800	O. Carlisle Edwards Jr. (843) 576-2900 Matthew Clark LaFave (803) 724-5727 Regina Hollins Lewis (803) 790-8838 Peden Brown McLeod Jr. (843) 329-9500 Morgan S. Templeton (843) 329-9500	Order for Continuance and Scheduling Order (7/2/15) Consent Order to Stay Proceedings (12/16/14)
3	07/13/2015	2:00 PM	0:15	Defendant, J. Morgan Kearse's Motion to Dismiss	J Morgan Kearse, as Special Administrator-DEF	08/12/2014	2014CP0600242 Donna Wilson VS J Morgan Kearse, as Special Administrator , defendant, et al	Motor Veh Accid 320	Mark Brandon Tinsley (803) 584-7676	Alfred Johnston Cox (803) 779-1833 x1728	MOTION #1
4	07/13/2015	2:00 PM	0:15	Motion/Compel	J Morgan Kearse as Special Administrator, et al-DEF	05/05/2015	2014CP0600241 Julian Scott Wilson VS J Morgan Kearse as Special Administrator, et al	Motor Veh Accid 320	H Woodrow Gooding (803) 584-7676	Alfred Johnston Cox (803) 779-1833 x1728	Motion is resolved per Cox (7/6/15)
5	07/13/2015	2:00 PM	0:15	Motion/Summary Judgment	Amridge University -PLT	05/13/2015	2015CP0600017 Amridge University VS Loana C. Benton a/k/a	Debt Collection 110	Edward L. Grimsley (803) 233-1177		NONJURY TRIAL #10MOTION #2
6	07/13/2015	2:00 PM	0:15	Motion/Compel	Kassandra Jones individually and as Mother and GAL of Sheanetta Jones-PLT	04/02/2015	2014CP0600279 Kassandra Jones individually and as Mother and GAL of Sheanetta Jones VS Barnwell County School District 45 a/k/a Barnwell School, defendant, et al	Personal Injury 350	Bernard McIntyre (843) 524-9040	Christy L Scott (843) 782-4359	Completed 06/15/2015

Barnwell County Second Judicial Circuit - Roster Details
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Number of motions = 24

#	Date	Time	hr:mn	Description	Filing Party	Filed Date	Case	Sub Type	Plaintiff Attorney	Defendant Attorney	Notes
7	07/13/2015	2:00 PM	0:15	Defendant Aiken Housing Center's Motion/Dismiss	Aiken Housing Center, Inc.-DEF	05/12/2015	2014CP0600399 Bobby Gene Sanders VS Aiken Housing Center, Inc.	Breach of Cont 140	William Franklin Barnes III (803) 943-2111	Robert T. Lyles Jr. (843) 577-7730	MOTION #3
8	07/13/2015	2:00 PM	0:15	Defendant/Aiken Housing Center's Motion/Summary Judgment	Aiken Housing Center, Inc.-DEF	05/12/2015	2014CP0600399 Bobby Gene Sanders VS Aiken Housing Center, Inc.	Breach of Cont 140	William Franklin Barnes III (803) 943-2111	Robert T. Lyles Jr. (843) 577-7730	
9	07/13/2015	2:00 PM	0:15	Motion/Compel and for Sanctions	Kassandra Jones, individually and as Mother and GAL of Sheanetta Jones-PLT	05/26/2015	2014CP0600279 Kassandra Jones, individually and as Mother and GAL of Sheanetta Jone VS Barnwell County School District 45, a/k/a Barnwell School defendant, et al	Personal Injury 350	Bernard McIntyre (843) 524-9040	Christy L Scott (843) 782-4359	Per McIntyre: Motion needs to be heard (7/8/15) MOTION #4
10	07/13/2015	2:00 PM	0:15	Motion/Summary Judgment	Green Tree Servicing, LLC-PLT	06/03/2015	2015CP0600006 Green Tree Servicing, LLC VS Letha Johnson	Contract/Other, 199	Jeffrey L. Silver (803) 779-4997		NONJURY TRIAL #9 Def Johnson has asked that the hearing be rescheduled (7/8/15) MOTION #5
11	07/13/2015	2:00 PM	0:15	Motion/Compel	EMK, Inc. d/b/a, et al-DEF	12/23/2014	2014CP0600280 Rita Suzanne Pitre VS EMK, Inc. d/b/a, et al	Personal Injury 350	H. Woodrow Gooding (803) 584-7676	Joseph DuRant Thompson III (843) 720-3469	MOTION #6
12	07/13/2015	2:00 PM	0:15	Motion/Summary Judgment	Department of Mental Health South Carolina-DEF	06/11/2015	2014CP0600207 Jane Doe, et al VS Department of Mental Health South Carolina	Medical Malpractice 220	Angus M. Lawton (843) 881-9901 Mark Brandon Tinsley (803) 584-7676	Michael C. Tanner (803) 245-9153	Scheduling Order (7/6/15) MOTION #7
13	07/13/2015	2:00 PM	0:15	Def Rain & Hail's Motion to Stay & Compel Arbitration	Rain & Hail, LLC-DEF	06/16/2015	2014CP0600429 Jeb Brailsford, Individually, and d/b/a JEBBCO, LLC VS AgSouth Farm Credit, et al	Breach of Cont 140	Shane Morris Burroughs (803) 268-9800 Ronnie Lanier Crosby (803) 943-2111	C. Cliff Rollins (803) 771-4400	Plaintiff's attorney, Burroughs, has an Order of Protection (6/29/15)
14	07/13/2015	2:00 PM	0:15	Motion/Summary Judgment	LVNV Funding, LLC-PLT	04/14/2015	2014CP0600470 LVNV Funding, LLC VS Angus Peoples	Debt Collection 110	Adam S. Tesh (803) 771-4400		NONJURY TRIAL #6 MOTION #8
15	07/13/2015	2:00 PM	0:15	Auto-Owners Ins Co's Motion to Compel Harrison's Discovery	Auto-Owners Insurance Company -DEF	06/18/2015	2014CP0600327 Jocelyn Rhodall VS Allen Harrison, d/b/a, et al , defendant, et al	Motor Veh Accid 320	Kent Clinton Kirkland Jr. (803) 259-4455	Lakesha W. Jeffries (803) 531-6300 John Thomas Lay Jr. (803) 724-1800	MOTION #9 and #10
16	07/13/2015	2:00 PM	0:15	Auto-Owners Ins Co's Motion to Compel Plaintiff Discovery	Auto-Owners Insurance Company -DEF	06/18/2015	2014CP0600327 Jocelyn Rhodall VS Allens Harrison, d/b/a et al , defendant, et al	Motor Veh Accid 320	Kent Clinton Kirkland Jr. (803) 259-4455	Lakesha W. Jeffries (803) 531-6300 John Thomas Lay Jr. (803) 724-1800	

Barnwell County Second Judicial Circuit - Roster Details
Motion Roster for Monday, July 13, 2015 @ 2:00 p.m.

Court Agency	Common Pleas	Judge	Hayes	Roster Id	41
Roster Type	Motion Roster	Roster Begin Date	07/13/2015	Roster End Date	07/16/2015

Number of motions = 24

#	Date	Time	hr:mn	Description	Filing Party	Filed Date	Case	Sub Type	Plaintiff Attorney	Defendant Attorney	Notes
17	07/13/2015	2:00 PM	0:15	Defs' Motion for Summary Judgment	Vernon F. (Pete) Grady-DEF	06/18/2015	2014CP0600084 Barnwell County, on Behalf of Barnwell County Economic Commi VS Marshall L (Marty) Martin Etal Jr , defendant, et al	Person Inj/Other 399	Robert L. Buchanan Jr. (803) 649-2586 James D. Mosteller III (803) 259-4964	M. Malissa Burnette (803) 404-6900 Ellis Reed-Hill Lesemann (843) 724-5155	Pending Order of Continuance for the trial and Summary Judgment motion (7/2/15)
18	07/13/2015	2:00 PM	0:15	Defendant's Motion/Sel Aside/Default	John Robertson-DEF	06/22/2015	2015CP0600137 O'Neal Chavis VS John Robertson	Motor Veh Accid 320	Daniel Webster Williams (803) 259-2759	Brett Harris Bayne (803) 227-2281	Completed:07/06/2015
19	07/13/2015	2:00 PM	0:15	Motion for a Compulsory Order of Reference W/Finality	Enterprise Bank of South Carolina-DEF	06/29/2015	2014CP0600237 Timothy Bodiford VS James A. Bozard, Et Al Jr. , defendant, et al	Real Prop/Other 499	James Martin Harvey Jr. (803) 259-5531	Everett W. Bennett Jr. (843) 549-9225 Laine Brabham Gooding (803) 584-7676	Completed:07/08/2015P ending Consent Order of Reference (7/8/15)
20	07/13/2015	2:00 PM	0:15	Motion/Compel	Christina Ann Bailey-PLT	06/19/2015	2014CP0600181 Christina Ann Bailey VS Akeem Rashad Jean et al , defendant, et al	Motor Veh Accid 320	Daniel Webster Williams (803) 259-2759	James Edward Brogdon III (803) 724-1801 Glen M Darbyshire (912) 232-7000 John Dwight Hudson Jr. (803) 724-1777 Regina Hollins Lewis (803) 790-8838 Joseph DuRant Thompson III (843) 720-3469	MOTION #11
21	07/13/2015	2:00 PM	0:15	Defendant Bolen's Motion to Amend Answer	Norman Bolen-DEF	07/01/2015	2014CP0600126 Ford Motor Credit Company, LLC VS Norman Bolen	Debt Collection 110	Wylie Westmoreland Clarkson (803) 602-0789	Kent Clinton Kirkland Jr. (803) 259-4455 Thomas C. Salane (803) 227-4289	MOTION #12, 13, & 14
22	07/13/2015	2:00 PM	0:15	Def Bolen's Motion to Compel Discovery/Ford Motor Credit	Norman Bolen-DEF	07/01/2015	2014CP0600126 Ford Motor Credit Company, LLC VS Norman Bolen	Debt Collection 110	Wylie Westmoreland Clarkson (803) 602-0789	Kent Clinton Kirkland Jr. (803) 259-4455 Thomas C. Salane (803) 227-4289	
23	07/13/2015	2:00 PM	0:15	Def Bolen's Motion to Compel Discovery/Thomas Salane	Norman Bolen-DEF	07/01/2015	2014CP0600126 Ford Motor Credit Company, LLC VS Norman Bolen	Debt Collection 110	Wylie Westmoreland Clarkson (803) 602-0789	Kent Clinton Kirkland Jr. (803) 259-4455 Thomas C. Salane (803) 227-4289	
24	07/13/2015	2:00 PM	0:15	Defendants Motion for Continuance past 7/13/15	Vernon F. (Pete) Grady-DEF	07/01/2015	2014CP0600084 Barnwell County, on Behalf of Barnwell County Economic Commi VS Marshall L (Marty) Martin Etal Jr	Person Inj/Other 399	Robert L. Buchanan Jr. (803) 649-2586 James D. Mosteller III (803) 259-4964	M. Malissa Burnette (803) 404-6900 Ellis Reed-Hill Lesemann (843) 724-5155	Pending Order of Continuance for the trial and Summary Judgment motion (7/2/15)

Barnwell County Second Judicial Circuit - Roster Details
Motion Roster for Monday, July 13, 2015 @ 2:00 p.m.

Court Agency	Common Pleas	Judge	Hayes	Roster Id	41
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Number of motions = 24

#	Date	Time	hr:mn	Description	Filing Party	Filed Date	Case	Sub Type	Plaintiff Attorney	Defendant Attorney	Notes
							defendant, et al				

STATE OF SOUTH CAROLINA
COUNTY OF BARNWELL

Green Tree Servicing LLC,

Plaintiff,

vs.

Letha Johnson,

Defendant,

IN THE COURT OF COMMON PLEAS
C/A NO.: 2015-CP-06-0006

COPY

NOTICE OF HEARING

RECEIVED

NOV 20 2015

SC Court of Appeals

RONNIE A. HASELVEEN
CLERK OF COURT
BARNWELL COUNTY, S.C.

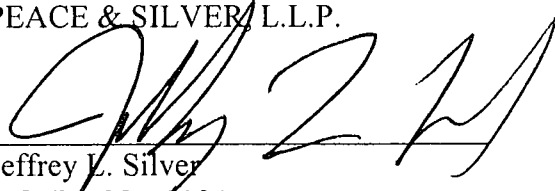
2015 JUN 19 PM 1:32

FILED FOR RECORD

TO ABOVE NAMED DEFENDANT:

A hearing has been scheduled in the above-referenced action for July 13, 2015 at 2:00 p.m. at the Barnwell County Courthouse, 141 Main Street, Barnwell, South Carolina, before the Honorable J. Mark Hayes, II, the Judge, Judicial Circuit.

TYLER, CASSELL, JACKSON
PEACE & SILVER, L.L.P.


Jeffrey L. Silver
S.C. Bar No. 5104
1331 Elmwood Avenue, Suite 300
Post Office Box 11656
Columbia, South Carolina 29211
(803) 252-7689
ATTORNEY FOR PLAINTIFF

Columbia, South Carolina
June 16, 2015

This communication is an attempt to collect a debt and any information obtained will be used for that purpose.

STATE OF SOUTH CAROLINA

COUNTY OF BARNWELL

Green Tree Servicing LLC,

Plaintiff,

vs.

Letha Johnson,

Defendant,

IN THE COURT OF COMMON PLEAS

C/A NO.: 2015-CP-06-0006

COPY

CERTIFICATE OF SERVICE

RECEIVED

NOV 20 2015

SC Court of Appeals

FILED FOR RECORD
2015 JUN 19 PM 1:32
RHONDA D. IFFELVEEN
CLERK OF COURT
BARNWELL COUNTY, S.C.

I, Rhonda Foxworth, Legal Assistant to Jeffrey L. Silver of the firm of Tyler, Cassell, Jackson, Peace & Silver, L.L.P., do hereby certify that I have served a copy of the below named document upon the parties listed below by U.S. Mail, postage prepaid, on June 17, 2015, and addressed as follows:

DOCUMENT SERVED:

Notice of Hearing

PARTIES SERVED

Letha Johnson
132 Jones Bridge Road
Blackville, South Carolina 29817

Rhonda Foxworth
Rhonda Foxworth

June 17, 2015