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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Harry Easterling, Jr, Special Referee

RECEIVED

MAR 10 2016

SC Court of Appeals

Case No. 2012-CP-17-0060
Court of Appeals No. 2015-000985

Bank of America, N. A. successor by merger to BAC Home Loans Servicing, LP
f/k/a Countrywide Home Loans Servicing LLP,Respondent.

v.

Shawn L. Bethea, South Carolina Department of Motor Vehicles, Defendants,

Of whom Shawn L. Bethea is the.....Appellant.

MOTION TO STAY

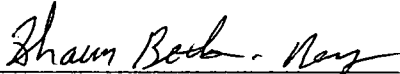
Shawn Bethea, In Propria Persona
1317 Gordonville Court
Dillon, South Carolina 29536
Appellant

Date: March 10, 2016

Shawn L. Bethea (Appellant) respectfully requests that the Court grant my request to remain in my home, lot of land situated, lying and being in the County of Dillon, State of South Carolina, containing .46 acres and is shown and designated as Lot No. 4 on a map or plat of Gordonville Subdivision prepared by Pittman-Leeson Survey Company, dated November 1, 1997, and recorded April 12, 1999, in the Office of the Clerk of Court for Dillon County in Plat Book 28, at Page 180.

WHEREFORE, for good cause, Appellant prays that the Court grant my request based on rule 241(b),4. The respondent has claimed the property to be real property which contradicts what the tax office in Dillon County has said in the attached document. The tax accessory office provided the previous owner with a tax break by consolidating her taxes for the land and the home into one tax however, the document clearly states that the mobile home will not be de-titled to the land.

The title to the mobile home has solely been in my name since September 2011 and provides evidence that Respondent has no interest in this matter. Due to Respondent having no interest in this matter, the sale of my property to Fannie Mae in May 2015 was conducted illegally and after the matter entered the Appellant Court. The parties involved are awaiting the court's decision. I have requested numerous times for either Respondent or Fannie Mae to produce a title to my home, which they have failed to do.


Shawn Bethea, In Propria Persona
1317 Gordonville Court
Dillon, South Carolina 29536

411-200-000980
Exhibit

27
6

SOUTH CAROLINA
Dillon COUNTY

MANUFACTURED HOUSING AFFIDAVIT

NOW COMES THE UNDERSIGNED, and after being duly sworn deposes and says:

1. That Shirley McRae Davis is/are the owner(s) of the following described manufactured home: 2001 Pioneer Serial No. PH124GA17807A/B
2. That said manufactured home was purchased by Affiant(s) on the 14th day of September, ~~XX~~ 2000 from B-Z Home Sales whose address is 1717 Hwy. 301 South, Dillon, SC 29536
3. That Affiant(s) (has/have) no knowledga of any liens or security interest against said manufactured home, except such liens and security interest as may be set forth on Exhibit A attached hereto and incorporated herein by reference.
4. That Shirley McRae Davis is/are the owner(s) of a certain tract or parcel of land located in Dillon County, South Carolina as more particularly on the attached Exhibit B.
5. That the wheels, axles and towbar of the manufactured home described in Item 1 above have been permanently removed from said manufactured home.
6. That the manufactured home described in Item 1 above has been placed on and affixed to a permanent foundation located on the real property described in the attached Exhibit B.
7. That permanent underpinning, roofing, porches, patios, and other permanent structures have been added to the manufactured home and real property.
8. That the manufactured home has been permanently connected to water, sewer and other utilities serving the property described in the attached Exhibit B.
9. That the Affiant(s) expressly intend(s) that the manufactured home described in Item 1 above be permanently affixed to the real property described in attached Exhibit B, so as to constitute and become a part of said real property.
10. That the Affiant(s) make(s) this Affidavit to Investors Title Insurance Company as part of the consideration and to induce Investors Title Insurance Company to provide title insurance to Alliance Funding, a Division of Superior Bank FSB (lender) for a loan from Lendar to Affiant(s) secured by the real property described in attached Exhibit B and the manufactured home described in Item 1 above as permanently affixed to said real property.

IN WITNESS WHEREOF, the undersigned have set their hand(s) and seal(s), this 14th day of September, ~~XX~~ 2000.

Shirley McRae Davis (Seal)
Owner of Property Shirley McRae Davis

SWORN TO AND BEFORE ME THIS
14th DAY OF SEPTEMBER, 2000:
[Signature]
NOTARY PUBLIC FOR SOUTH CAROLINA

MY COMMISSION EXPIRES: 02/03/2010

07
C/N 2015-000925
Exhibit 2.

DATE: SEPTEMBER 27, 2000

RE: ADDING MR TO PROPERTY CARD IN ORDER TO RECEIVE ONE TAX NOTICE

It appears from the public records that SHIRLEY MCRAE-DAVIS
(is) (are) the owners of the real property described as Dillon County
Tax Map Number 069-00-00-139 and one ~~PK~~ 2001 PIONEER
Mobile Home, Serial No. PH1124GA17807A/B

Based upon the foregoing and upon the Manufactured Housing
Affidavit attached, the undersigned will cause said home to be listed on
the same tax notice as the land referred to herein.

Steve Rogers
Steve Rogers
Dillon County Tax Assessor

PS

PLEASE KEEP IN MIND THAT THESE TRANSACTIONS WILL NOT OCCUR UNTIL
2001 TAX YEAR BECAUSE THAT IS WHEN THE LAND AND MOBILE HOME WILL
APPEAR ON THE TAX RECORDS. ALSO, THIS MOBILE HOME WILL NOT BE DE-
TITLED. IT WILL STILL BE CLASSIFIED AS SUCH. IT IS ONLY BEING ADDED
WITH THE LAND SO THAT THE PROPERTY OWNER CAN RECEIVE ONE TAX NOTICE
INSTEAD OF TWO.

STATE OF SOUTH CAROLINA
CERTIFICATE OF TITLE
OF A VEHICLE

VEHICLE ID NUMBER

PH11246A17807A/B

YEAR MAKE

2001 PONTIAC

MODEL

PH11

NEW/USED
USED

BODY STYLE

HBH

DATE ISSUED

10-03-2011

ODOMETER

WEIGHT
3500

TITLE NUMBER

770170239031660

VEHICLE BRAND(S)

EXEMPT

FULL NAME OF OWNER(S)

BETHEA SHAWN LEE
1317 GORDONVILLE CT
DILLON SC 295367782

CUSTOMER NUMBER: 022276059

10-3-2011
Certificate of
Title issued
to me for my
home

THE SOUTH CAROLINA DEPARTMENT OF MOTOR VEHICLES HEREBY CERTIFIES THAT THE PERSON HEREIN IS REGISTERED BY THIS DEPARTMENT AS THE LAWFUL OWNER OF THE VEHICLE DESCRIBED SUBJECT TO THE LIENS, IF ANY, HEREIN SET FORTH.

KEVIN A. SHWEDO
EXECUTIVE DIRECTOR

NIKKI R. HALEY
GOVERNOR

04-754615

CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Harry Easterling Jr.
116 N. Liberty Street
Bennettsville, SC 29512

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Shawn Bethea

CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Dillon County Attorney

110 E. Main Street

Latta, SC 29565

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Shawn Bethea - Reg

Shawn Bethea

CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Dillon County Magistrate's Office

1033 Old Latta Highway

Suite B

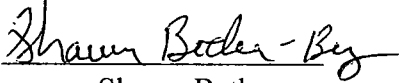
Dillon, SC 29536

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CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Dillon County Sheriff's Office

1033 Old Latta Highway

Suite A

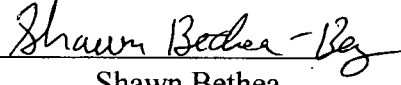
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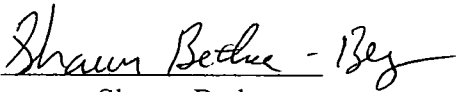
CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Honorable Gwen T. Hyatt
Clerk of Court in Dillon County
301 W. Main Street
Dillon, SC 29536

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CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:


South Carolina Law Enforcement Division

310 S. Dargan Street

Florence, SC 29506

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CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Attorney General
1000 Assembly Street
Columbia, SC 29201

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Shawn Bethea

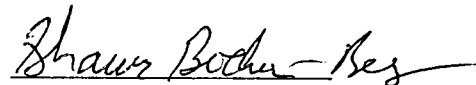
CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by hand delivering a copy thereof to:

Roger Townsend and Thomas PC
220 Executive Center Drive
#109
Columbia, SC 29201

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Shawn Bethea


CERTIFICATE OF SERVICE

The undersigned Motion to Stay was served on the parties to this action by depositing a copy thereof in the United States Mail, first class, postage prepaid address to:

McGuireWoods LLP
Fifth Third Street
201 North Tryson Street
Suite 3000
Charlotte, NC 28202
Respondent

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