

The South Carolina Court of Appeals

Libby Corporation, Respondent,

v.

Haiyan Lin, Appellant.

Appellate Case No. 2015-000350

RECEIVED

MAR 18 2016

SC Court of Appeals

The Honorable The Honorable James O. Spence

Lexington County

Trial Court Case No. 2013CP3203548

Reply To Respondent's Motion
To Dismiss Appeal of Appellant Haiyan Lin

The appellant has received the respondent's Motion to Dismiss Appeal of Appellant Haiyan Lin, along with the Memorandum in Support of the Motion to Dismiss Appeal, on March 2, 2016.

The respondent has attempted to confuse the court with his lengthy Memorandum in an effort to deprive the appellant's due process right of appeal. The respondent wasted the court time to enlist the events and filings, which

are readily available in the case file for court to review. They are the facts in black and white. The appellant does not want to waste the court time any farther to response to the respondent's Motion and its Memorandum in great lengthy details.

In short, the appellant only want to enlight the court that the sole purpose of the respondent's Motion to Dismiss Appeal of Appellant Haiyan Lin is to deprive her right to appeal in order to uncover his misconducts of perjury upon the court in the lower court. To accomplish that he again purposely misrepresent the facts to confuse the appellate court. On page 4 of his memorandum, he stated that "see order, August 3, 2015. (also attached as exhibit K). On September 10, 2015, thirty-seven days after issuance of the order, the appellant provided evidence of payment to Ms. Thomson of \$160.00 for the transcripts".

In fact, the order was issued on August 31, 2015, and the appellant's response of Sept. 10, 2015, ~~is~~ is within 10 days of issuance of the order, not "thirty-seven days after the issuance of the order". This is not a simple mistake made by him, but rather his legal manipulation tactics to misrepresent facts in order to deprive the appellant's due process right of appeal, just as he did in lower court. In this appeal, the appellant will show the court how he had deceived the clerk in obtaining the Order of Reference and also further perjury upon the court to push the case forward without due course in the lower court.

It is no need to explain why this appeal has extended this far. The case file speaks for itself. This is a foreclosure case. The appellant has financial trouble; she could not afford to hire an attorney; she has to earn her living while in appeal; she has to attend a family emergency; that cause further financial hardship and time delay; she has to research

as she move forward with the appeal; and so on and so forth. It is certainly not easy to be a pro se appellant. In quick response to the court order of Jan. 6, 2016, the appellant has submitted her initial brief and designation of matters on appeal, on Jan. 25, 2016. The appellant realized that the submissions are far from perfect. Therefore, she has filed the Amended Motion For Extension of Time To File Appellant's Initial Brief on Jan. 27, 2016, and Amended Motion For Extension of Time To File Amended Appellant's Initial Brief and Amended Designation of Matters on Feb. 9, 2016, and Amended Designation of Matter To Be Included On Record On Appeal on March 1, 2016. The appellant reserves her right to amend her initial brief and designation of matter further as deem necessary to perfect her appeal in according to the appellate court rules, to protect her due process right of appeal.

March 14, 2016

Haiyan Lin
P.O. Box 8776
Columbia SC 29202

State of South Carolina
County of Lexington
In the Court of Common Pleas

Case No. 2013 CP 3203548

Libby Corporation ----- Plaintiff(s)
Vs.
Haiyan Lin ----- Defendant(s)

Proof of Service

RECEIVED

MAR 18 2016

SC Court of Appeals

I certify that I have served a copy of
the Reply to Respondent's Motion to Dismiss
to the attorney for the respondent on
March 14, 2016 by US mail to
Joseph A. Vasquez
P.O. Box 4024
W. Columbia, SC 29171

March 14, 2016

Haiyan Lin
P.O. Box 8776
Columbia, SC 29202