


FORM 8
LETTER TO THE APPELLATE COURT CLERK
FILING THE NOTICE OF APPEAL

The Honorable Tanya A. Gee
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

MAY 1 4 2012

SC Court of Appeals

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211]

RE: Daisy D Conyers, as Personal Representative of the
Respondent, v. Irmo Properties, Appellant, Case No. 2011-CP-40-08584

Dear Ms. Gee [Mr. Shearouse]:

Enclosed for filing is a notice of appeal in the above case. Also enclosed
are the following:

- (1
) Proof of service of the notice of appeal on the respondent[s].
- (
2) A copy of the order[s] [judgment] which is [are] to be challenged on ✓
appeal.
- (
3) A Copy of a motion requesting the filing fee be assessed under rule 240.*
[(
4) This appeal is being filed with the Supreme Court because . . . (see Rule

203(d) for when an appeal can be filed with the Supreme Court).]

Sincerely,
s/Daisy D Conyers

cc: Daisy D Conyers
1430 Means ave
Columbia SC 29210

Personal Rep, for Respondent **803-223-8014**

* Under Rule 203(d)(1)(B)(iii) and (d)(2)(B)(iii), SCACR, a filing fee is
not required C

8. The Defendant admits the allegations contained in Paragraph 11 of the Complaint.
9. The Defendant lacks information sufficient to form a belief as to the allegations contained in Paragraph 12.
10. The Defendant admits the allegations contained in Paragraph 13 of the Complaint.
11. The Defendant denies the allegations contained in Paragraphs 14 and 15 of the Complaint and demands strict proof thereof.
12. The Defendant lacks information sufficient to form a belief as to the allegations contained in Paragraphs 16 and 17.
13. The Defendant denies the allegations contained in Paragraphs 18 and 19.
14. The Defendant admits the allegations contained in Paragraphs 20, 21, 22, 23, 24, 25, 26, 27, 28 and 29 of the Complaint.
15. The Defendant lacks information sufficient to form a belief as to the allegations contained in Paragraph 20.

COUNTERCLAIM

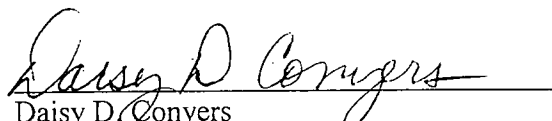
16. Each and every allegation of the above paragraphs is repeated as if fully realleged herein.
17. The Defendant asserts that Plaintiff failed to comply with the South Carolina Consumer Protection Code section 37-10-102 (a) by failing to allow Defendant the right to chose her own closing attorney. Further, Defendant asserts that Plaintiff refused to allow her to bring in the attorney of her choosing and instead forced her to use the same attorney that is currently bringing this foreclosure action.
18. Defendant believes that she is entitled to relief pursuant to the South Carolina Consumer Protection Code and this action should be dismissed accordingly.
19. The Defendant requests an accounting of all payments credited and charges assessed on the accounts that are the subject of the foregoing action.

20. The Defendant requests the following relief: That the Court reduce any amount found to be owing by Defendant, if any, by the amount of any overcharges and/or unsubstantiated charges as determined by the Court.
21. The Defendant requests that she be allowed to conduct discovery pursuant to the South Carolina Rules of Civil Procedure.

WHEREFORE, the Defendant respectfully prays as follows:

- A. For this action to be dismissed;
- B. For Plaintiff to be held in violation of the South Carolina Consumer Protection Code;
- C. For a complete accounting of all charges and credits to the alleged account;
- D. That Defendant be allowed to conduct discovery pursuant to the South Carolina Rules of Civil Procedure; and
- E. Such other and further relief as the Court deems just and proper.

Respectfully submitted,


Daisy D Conyers
1430 Means Avenue
Columbia, SC 29210
(202) 308-6306

Columbia, South Carolina
May 1, 2012

appeal from the final judgment entered by the Master In Equity shall be to the Supreme Court or the Court of Appeals as provided by the South Carolina Appellate Court Rules.



Clerk of Court, Richland County

WE SO MOVE:

Kenneth E. Ormand, Jr., LLC

By: 

Kenneth E. Ormand, Jr.,
Attorney for Plaintiff