

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2016-002041

RECEIVED
MAR 27 2017
SC Court of Appeals

U.S. Bank National Association, as Trustee for
Citigroup Mortgage Loan Trust, Inc., Mortgage
Pass-Through Certificates, Series 2006-WF2,

Respondent,

v.

Charles T. Brooks, III; Irma R. Brooks; Woodcreek
Farms Homeowners Association; Community Resource
Bank N.A.; Robinson Equipment Company, A Limited
Partnership; South Carolina Department of Revenue; and
the United States of America acting by and through
its agency the Internal Revenue Service,

Defendants,

Of whom Charles T. Brooks, III and Irma R. Brooks are the,

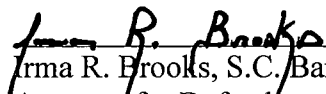
Appellants.

RETURN TO RESPONDENT'S MOTION TO DISMISS
APPELLANT'S APPEAL AS UNTIMELY

The Appellants, Charles and Irma Brooks, have carefully reviewed and considered the Respondent's Motion to Dismiss Appellant's Appeal as Untimely. The Appellants have the duty

to establish that this appeal is timely. The time frames asserted in Respondent's Motion appear to be true and correct. It now appears the Appellants have mistakenly calculated the dates for the appeal based on the written receipt of the Order denying the Motion for Reconsideration, and not from the electronic receipt of the same. Therefore, the Appellants defer to this Honorable Court to render an appropriate decision herein based on the South Carolina Rules of Civil Procedure, the South Carolina Appellate Court Rules, and the established case laws and legal decisions of the State of South Carolina.

Respectfully submitted,


Irma R. Brooks, S.C. Bar # 8507
Attorney for Defendants Charles T. Brooks,
III, and Irma R. Brooks
THE BROOKS LAW OFFICE, LLC
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29151
803-418-5708
803-934-9618 [Facsimile]
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March 23, 2017

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Defendants,

Of whom Charles T. Brooks, III and Irma R. Brooks are the,

Appellants.

PROOF OF SERVICE

The undersigned states that on March 23, 2017, a true and correct copy of the

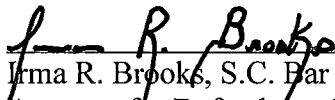
RETURN TO

RESPONDENT'S MOTION

TO DISMISS APPELLANT'S APPEAL AS UNTIMELY

has been served upon the party identified below by depositing in the United States mail, proper postage affixed and addressed as follows:

Ms. Magalie A. Creech
Attorney at Law
FINKEL LAW FIRM, LLC
Post Office Box 41489
Charleston, South Carolina 29423



Irma R. Brooks, S.C. Bar # 8507
Attorney for Defendants Charles T. Brooks,
III, and Irma R. Brooks
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March 23, 2017

The Brooks Law Office, LLC

CHARLES T. BROOKS, III, ATTORNEY AT LAW
IRMA R. BROOKS, ATTORNEY AT LAW

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SC Court of Appeals

March 23, 2017

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

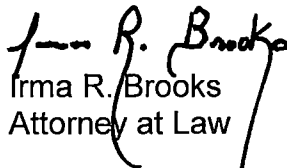
RE: U.S. Bank National Association, *et al.* v. Charles T. Brooks, III, *et al.*
Appellate Case No.: 2016-002041

Dear Ms. Kitchings:

Enclosed, please find a **RETURN TO RESPONDENT'S MOTION TO DISMISS APPELLANT'S APPEAL AS UNTIMELY** and a **PROOF OF SERVICE** in the above referenced matter, along with the appropriate copies.

Thank you in advance for your attention to this matter.

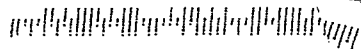
Sincerely,


Irma R. Brooks
Attorney at Law

Enclosures as stated

cc: Ms. Magalie A. Creech
Attorney at Law
FINKEL LAW FIRM, LLC
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Charleston, South Carolina 29423

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