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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY

Court of Common Pleas

Dale Edward Van Slambrook, Master-in-Equity

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APR 19 2017

SC Court of Appeals

Case No. 2017-0000613

Quicken Loans, Inc.....Respondent,

v.

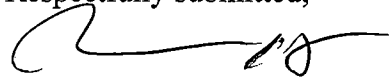
Edwin Wright.....Appellant.

MOTION TO DISMISS

William P. Stork, S.C. Bar No. 100242
Scott & Corley, P.A.
2712 Middleburg Dr., Suite 200
Columbia, SC 29204
803-252-3340
Attorneys for Respondent

PLEASE TAKE NOTICE that the Respondent, Quicken Loans, Inc., (“Respondent”), by and through its undersigned attorney, will move before this Court for an Order dismissing the instant appeal pursuant to South Carolina Appellate Court Rules 269 and 260 on the grounds that the Appeal is frivolous and taken solely for the purposes of delay, raises issues not properly preserved for appeal, and that the Order being appealed has been vacated of record (Order vacating the Writ of Assistance is attached and incorporated herein as **Exhibit “A”**).

Respectfully submitted,



William P. Stork, S.C. Bar No. 100242
Scott & Corley, P.A.
2712 Middleburg Dr., Suite 200
Columbia, SC 29204
803-252-3340
Attorneys for Respondent

4/17, 2017
Columbia, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Quicken Loans, Inc.,

PLAINTIFF,

VS.

Edwin Wright; and Brickhope Plantation
(Tract E2-C) Master Community Association,
Inc.,

DEFENDANT(S).

IN THE COURT OF COMMON PLEAS

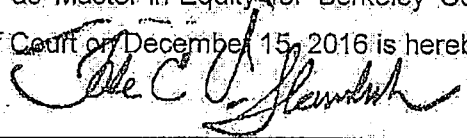
CASE NO. 2014-CP-08-00155

MOTION AND ORDER TO VACATE WRIT OF
ASSISTANCE

(151103.00013BH)

Upon motion of the undersigned counsel, pursuant to the *South Carolina Rules of Civil Procedure*, Plaintiff hereby moves that the Writ of Assistance executed on December 14, 2016 by The Honorable Dale Van Slambrook as Master-in-Equity for Berkeley County, South Carolina, and filed with the Berkeley County Clerk of Court on December 15, 2016, be vacated due to ownership of the subject property transferring before the scheduled lock out date; It is hereby

ORDERED, ADJUDGED AND DECREED that the Writ of Assistance executed on December 14, 2016 by The Honorable Dale Van Slambrook as Master-in-Equity for Berkeley County, South Carolina, and filed with the Berkeley County Clerk of Court on December 15, 2016 is hereby vacated.



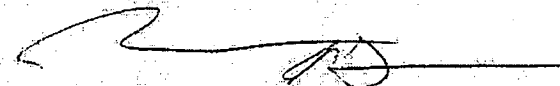
Dale Van Slambrook
Master in Equity for Berkeley County

4/7, 2017

I SO MOVE:

SCOTT AND CORLEY, P.A.

By:

	
Ronald C. Scott, SC Bar #4996	Jessica S. Corley, SC Bar #80470
Reginald P. Corley, SC Bar #69453	Allison E. Heffernan, SC Bar #68530
Angelia J. Grant, SC Bar #78334	Matthew E. Rupert, SC Bar #100740
Vance L. Brabham, III, SC Bar #71250	William P. Stork, SC Bar #100242
Andrew M. Sullivan, SC Bar #100464	

ATTORNEYS FOR PLAINTIFF
2712 Middleburg Drive, Suite 200
Columbia, SC 29204
803-252-3340

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BERKELEY COUNTY, S.C.

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STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

Quicken Loans, Inc.,

PLAINTIFF,

VS.

Edwin Wright; and Brickhope Plantation
(Tract E2-C) Master Community Association,
Inc.,

DEFENDANT(S).

IN THE COURT OF COMMON PLEAS

CASE NO. 2014-CP-08-00155


CERTIFICATE OF SERVICE BY MAIL

(151103.00013BH)

The undersigned hereby certifies that s/he is an employee of Scott and Corley, P.A. and is a person of such age and discretion as to be competent to serve papers and that on March 31 2017, s/he mailed a copy of the Motion and Order to Vacate Writ of Assistance addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at the Scott and Corley, P.A. office, 2712 Middleburg Drive, Suite 200, Columbia, SC 29204.

Addressee:

Edwin Wright
219 Mayfield Dr.
Goose Creek, SC 29445


Stefan Ohlsson
SCOTT AND CORLEY, P.A.
2712 Middleburg Dr., St 200 (29204)
P.O. Box 2065 (29202)
Columbia, South Carolina

DU

SCOTT AND CORLEY, P.A.
CLERK OF COURT
BERKELEY COUNTY, S.C.

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APPEAL FROM BERKELEY COUNTY

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SC Court of Appeals

Quicken Loans, Inc.....Respondent,

v.

Edwin Wright.....Appellant.

PROOF OF SERVICE

William P. Stork, S.C. Bar No. 100242
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SC Court of Appeals

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Columbia, SC 29202

April 17 2017

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

**RE: Quicken Loans, Inc. v. Edwin Wright and Brickhope Plantation (Tract
E2-C) Master Community Association, Inc.
Appellate Case No.: 2017-0000613**

Dear Ms. Kitchings,

Enclosed please find one original and copy of the Motion to Dismiss Appeal and Proof of Service in the above referenced matter. Upon filing, kindly return a clocked copy of same to our office in the self-addressed, postpaid envelope provided.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Scott and Corley, P.A.


Caroline Laster
Litigation Paralegal

Enclosed:
Re: Edwin Wright



SCOTT & CORLEY, P.A.
P.O. Box 2065
Columbia, South Carolina 29202

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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Columbia, SC 29211