

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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Case No. 2016-002570

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Quicken Loans, Inc.....Respondent,

v.

Edwin Wright.....Appellant.

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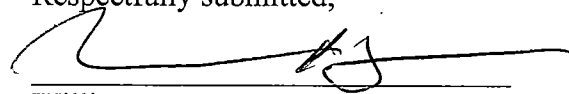
**AMENDED MOTION TO DISMISS**

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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

4/19, 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

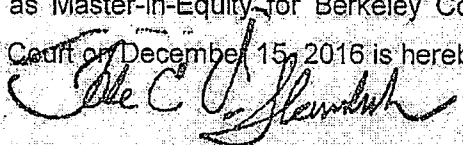
CASE NO. 2014-CP-08-00155

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  
Reginald P. Corley, SC Bar #69453  
Angelia J. Grant, SC Bar #78334  
Vance L. Brabham, III, SC Bar #71250  
Andrew M. Sullivan, SC Bar #100464

Jessica S. Corley, SC Bar #80470  
Allison E. Heffernan, SC Bar #68530  
Matthew E. Rupert, SC Bar #100740  
William P. Stork, SC Bar #100242

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

FILED  
CLERK OF COURT  
BERKELEY COUNTY, S.C.

APR - 7 PM 4:14

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

*DW*

17 APR - 7 PM 5:14  
BENEFIT COURT  
BERKELEY COUNTY, S.C.

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

\_\_\_\_\_  
Case No. 2016-002570  
\_\_\_\_\_

Quicken Loans, Inc.....Respondent,

v.

Edwin Wright.....Appellant.

\_\_\_\_\_  
**AMENDED PROOF OF SERVICE**  
\_\_\_\_\_

I certify that I have served the Respondent's Motion to Dismiss on Edwin Wright by depositing a copy of it in the United States mail, postage prepaid, on April 19, 2017, at his address indicated below.

Dated: \_\_\_\_\_

4/19/17



\_\_\_\_\_  
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

*Pro Se* Appellant  
Edwin Wright  
219 Mayfield Dr.  
Goose Creek, SC 29445

**SCOTT AND CORLEY, P.A.**  
Attorneys and Counselors at Law

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Street Address:  
2712 Middleburg Drive,  
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Columbia, SC 29204

Telephone: (803) 252-3340  
Facsimile: (855) 601-4921

Mailing Address:  
P.O. Box 2065  
Columbia, SC 29202

April 19 2017

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

**RE: Quicken Loans v. Edwin Wright, Appellant**  
**Appellate Case No.: 2016-002570**

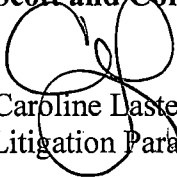
Dear Ms. Kitchings,

Enclosed please find one original and copy of the Amended Motion to Dismiss 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

Hasler

04/19/2017

US POSTAGE

FIRST-CLASS MAIL

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**RECEIVED**

APR 20 2017

SC Court of Appeals

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