

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
JUN 16 2017
SC Court of Appeals

APPEALS FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master-In-Equity
2013-CP-18-00519

Appellant Case No. 2016-000704

WELLS FARGO BANK, N.A.....Respondent

vs.

Richard B. Cunningham; Latisa L. Cunningham, et al
SC Housing Corp.; Drakesborough Homeowners Association, Inc.....Defendants

Of Whom Latisa L. Cunningham is the Appellant.

Second Amended Record on Appeal

Pro Se
Latisa L. Cunningham
c/o 1227 Wild Goose Trail
Summerville, South Carolina Republic [29483]

Attorney(s) for Respondent
James Martin Page
Chad Burgess
3800 Fernandina Road Suite #110
Columbia, SC 29210

Shelton Sterling Laney, III
550 South Main, Suite 400
Greenville, SC 29601

Matthew Todd Carroll
1727 Hampton Street
Columbia, SC 29201

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STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

2016 APR -1 PM 12:00

CLERK OF COURT
DORCHESTER COUNTY

Plaintiffs,

Case No. 2013-CP-18-00519

Vs.

V. Latisa L Cunningham et al;

Defendant(s)

OBJECTION TO SALE

I, Cunningham, Latisa L object to the sale that was held on my property. This sale was without my consent and unauthorized by my power of attorney.

For the record I would like to state that I, Cunningham, Latisa L am the living breathing self aware women who is an American. This court is operating in deception because it has not given full disclosure because they have withheld the fact that they did not explain to me that I am looked upon as a corporate entity that they have jurisdiction over and not as the natural person. This type of conduct will cause injury to the real person. This court is trying to deny the fact that it only has jurisdiction over U.S. Citizens and cannot interact with the natural person.

(See case law "US v Minker, 350 US 179 at 187(1956)

Supreme Court of the United States 1795 "Inasmuch as every government is an artificial person, an abstraction, and a creature of the mind only, a government can interface only with other artificial persons. The imaginary, having neither actuality nor substance, is foreclosed from creating and attaining parity with the tangible. The legal manifestation of this is that no government, as well as any law, agency, aspect, court, etc. can concern itself with anything other than corporate, artificial persons and the contracts between them.

Therefore, this is violation of my rights for this court to have sold my house without my consent and force me and my family to move out of our home. This was an unauthorized sale and did not have my consent.


Cunningham, Latisa L

Executrix

1227 Wild Goose Trail
Summerville, SC 29483
STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

Plaintiff,

vs.

Latisa Lenette Cunningham

Defendant(s)

2016 APR -1 PM 12:00

CLERK OF COURT
DORCHESTER COUNTY

OBJECTION TO SALE

Case No. 2013-CP-18-00519

CERTIFICATE OF SERVICE

For the claim is with the knowledge, I have sent a copy of the **OBJECTION TO SALE** by Certified Mail, to the following location(s) on this 29th day of March, in the year 2016:

J. Martin Page, SC bar#: 100200
Brock & Scott, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210
[Attorney for Plaintiff]


Cunningham, Latisa L.

Executrix

DBA LATISA L CUNNINGHAM
1227 Wild Goose Trail
Summerville, SC 29483

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

IN THE COURT OF COMMON PLEAS
CASE NO.: 2013-CP-18-00519

Wells Fargo Bank, N.A.,

FILED - RECORDED
2016 MAR 25 PM 3:15

Plaintiff,

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

v.

Richard B. Cunningham; Latisa L. Cunningham; Southcoast
Corp.; Drakesborough Homeowners Association, Inc.,

Defendant(s)

AFFIDAVIT OF VERIFIED STATEMENT OF ACCOUNT

PERSONALLY APPEARED, who being duly sworn, deposes and says:

1. My name is **Yergalem Werkneh** and I am authorized to execute this affidavit on behalf of Wells Fargo Bank, N.A., (hereinafter "Wells Fargo").
2. In the regular performance of my job functions, I am familiar with business records maintained by Wells Fargo for the purpose of servicing mortgage loans. These records (which include data compilations, electronically imaged documents, and others) are made at or near the time by, or from information provided or transmitted by, persons with knowledge of the activity and transactions reflected in such records, and are kept in the course of business activity conducted regularly by Wells Fargo. It is the regular practice of Wells Fargo's mortgage servicing business to make these records. In connection with making this affidavit, I have acquired knowledge of the matters stated herein by examining these business records.
3. Wells Fargo Bank, NA, directly or through an agent, has possession of the Promissory Note. Wells Fargo Bank, NA is either the original payee of the Promissory Note or the Promissory Note has been duly indorsed.
4. The borrower has defaulted under the terms of the Promissory Note and Mortgage, the default has not been cured, making the entire balance due and owing in accordance with the terms of the loan. Plaintiff is owed the following sums of money:

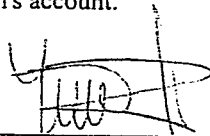
The amount due the Plaintiff on said Note through 12/29/2015 is \$215,842.35 which breaks down as follows:

Principal	\$173,443.06
Interest	
From 01/01/2013 to 12/29/2015@6%	\$31,151.02
Pre-acceleration Late Charges	\$0.00
Hazard Insurance Disbursements	\$4,425.77
Tax Disbursements	\$4,219.91
Property Inspections/Preservation	\$30.00
PMI/MIP Insurance	\$2,745.24
Other (specify charges/fees)	\$0.00
Escrow Balance Credit	\$0.00
Credits to Borrower	\$172.65
Total	\$215,842.35

Interest will continue to accrue until the date of judgment under the terms of the Note and Mortgage

5. It is the regular practice of Wells Fargo on behalf of Plaintiff, to generate such account summary information from the electronic payment history it maintains for Plaintiff. This payment history summary accurately reflects, to the best of my knowledge, the debits and credits made on the loan's account.

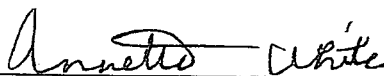
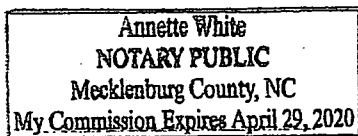
FURTHER AFFIANT SAYETH NOT.



Yergalem Werkinch-Vice President Loan Documentation
Wells Fargo Bank NA
01/06/16

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

The foregoing instrument was sworn to and subscribed before me this 6th day of January,
2016, by Yergalem Werkinch, who is personally known to me.



Annette White

NOTARY PUBLIC, State of North Carolina
my commission expires: 4/29/2020

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
CASE NUMBER 2013CP1800519

Wells Fargo Bank, Na

FILED - RECORDED
2016 MAR 21 PM 3:03

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Richard B Cunningham
SC Housing Corp

Latisa L Cunningham
Drakesborough
Homeowners
Association, Inc

PLAINTIFF(S)

DEFENDANT(S)

Submitted by:

Attorney for: ☐ Plaintiff ☐ Defendant
☐ Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- ☐ **JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- ☐ **DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. ☐ See Page 2 for additional information.
- ☐ **ACTION DISMISSED (CHECK REASON):** ☐ Rule 12(b), SCRPC; ☐ Rule 41(a), SCRPC (Vol. Nonsuit);
☐ Rule 43(k), SCRPC (Settled); ☐ Other: _____
- ☒ **ACTION STRICKEN (CHECK REASON):** ☐ Rule 40(j) SCRPC; ☐ Bankruptcy;
☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☒ Other: Rule 11
- ☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order; (formal order to follow) ☐ Statement of Judgment by the Court:

ORDER INFORMATION

This order ☒ ends ☐ does not end the case.

Additional Information for the Clerk: Motion to Stay of Sale and Motion for Status Hearing are hereby stricken pursuant Rule 11. The Motions were signed but failed to state the address of the Movant.

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Master in Equity

3078
Judge Code

3/8/2016
Date

Circuit Court Judge

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on 3-21-2016, and a copy mailed first class or placed in the appropriate attorney's box on 3-21-2016, to attorneys of record or to parties (when appearing pro se) as follows:

Alan Martin Stewart 3800 Fernandina Road Suite 110
Columbia, SC 29210

Patrick Alan McCabe 3800 Fernandina Road Suite 110
Columbia, SC 29210

George Hamlin O'Kelley III 652 Coleman Blvd., Ste.200
Mt. Pleasant, SC 29464

Sara Volk Martinez 60 Executive Park South, N.E. Atlanta,
GA 30329

Latisa L Cunningham 1227 Wild Goose Trail Summerville,
SC 29483

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Cheryl Graham

Court Reporter

Cheryl Graham - Clerk of Court

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

FILED - RECORD

2016 MAR -7 PM 4:14

BROCK & SCOTT, PLLC
4550 COUNTRY CLUB RD
WINSTON-SALEM NC 27107

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

NOTICE OF SALE
NOTICE OF SALE
CIVIL ACTION NO.

2013-CP-18-00519
BY VIRTUE of the decree
heretofore granted in the case
of Wells Fargo Bank, N.A. vs.
Richard B. Cunningham; Latisha
L. Cunningham; SC Home-
owners Corp.; Drakesborough
Homeowners Association,
Inc., the undersigned Master
In Equity for Dorchester
County, South Carolina, will
sell on March 1, 2016 at
11:00AM, at the Dorchester
County Courthouse, City of
Saint George, State of South
Carolina, to the highest bid-
der.

ALL THAT CERTAIN
PIECE, PARCEL OR LOT
OF LAND, TOGETHER
WITH ALL IMPROVE-
MENTS THEREON, SIT-
UATE, LYING AND BEING
IN THE COUNTY OF DOR-
CHESTER, STATE OF
SOUTH CAROLINA,
KNOWN AND DESIGNA-
TED AS LOT 272, OF
DRAKESBOROUGH SUB-
DIVISION, IN THE JED-
BURG COMMUNITY, AS
SHOWN ON THAT CER-
TAIN PLAT ENTITLED:
"FINAL PLAT SHOWING
THE SUBDIVISION OF
LOTS 95-115, LOTS
272-284, A PORTION OF
HOA 1 AND HOA 4 OF
PHASE 1, DRAKESBOR-
OUGH SUBDIVISION
FROM TRACT WITH
TMS# 121-00-00-330,
LOCATED IN THE JED-
BURG COMMUNITY,
DORCHESTER COUNTY,
SOUTH CAROLINA,"
PREPARED BY MARK
ELLIS LARIS, PLS.
23200, OF AEGIS LAND
SURVEYING, INC. DATED
AUGUST 17, 2007, RE-
VISED OCTOBER 8, 2007,
AND RECORDED NOVEM-
BER 7, 2007, IN PLAT
CABINET 1, AT PAGE 83,
IN THE OFFICE OF THE
REGISTER OF DEEDS
FOR DORCHESTER
COUNTY, SOUTH CARO-
LINA, FOR A MORE COM-
PLETE DESCRIPTION OF
SAID LOT, REFERENCE
MAY BE HAD TO THE
AFOREMENTIONED PLAT
OF RECORD.

open after the date of sale and
shall be final on that date, and
compliance with the bid may
be made immediately. Pur-
chaser to pay for documenta-
ry stamps on the Deed. The
successful bidder will be re-
quired to pay interest on the
amount of the balance of the
bid from date of sale to date of
compliance with the bid at the
rate of 6% per annum. The
sale shall be subject to taxes
and assessments, existing
easements and restrictions,
of record and any other senior
encumbrances.
In the event an agent of Plain-
tiff does not appear at the time
of sale, the within property
shall be withdrawn from sale
and sold at the next available
sales date upon the terms and
conditions as set forth in the
Judgment of Foreclosure and
Sale or such terms as may be
set forth in a supplemental
order.

The Honorable
James E. Chellis
Master In Equity for
Dorchester County
Brock & Scott, PLLC
3800 Fernandina Road,
Suite 116
Columbia, SC 29210
Attorneys for Plaintiff
13-03642
AD# 1416401

BEING THE SAME PROP-
ERTY CONVEYED TO RI-
CHARD B. CUNNINGHAM
AND LATISHA L. CUN-
NINGHAM HEREIN BY
DEED OF BEAZER
HOMES CORP., A TEN-
NESSEE CORPORATION,
DATED NOVEMBER 24,
2008 AND RECORDED
NOVEMBER 26, 2008 IN
DEED BOOK 5871 AT
PAGE 58. THEREAFTER,
THE SAME PROPERTY
WAS CONVEYED TO LAT-
ISHA L. CUNNINGHAM BY
DEED OF RICHARD B.
CUNNINGHAM DATED
MARCH 14, 2013 AND
RECORDED MARCH 15,
2013 IN DEED BOOK
5728 AT PAGE 153 IN
THE OFFICE OF THE REG-
ISTER OF DEEDS FOR
DORCHESTER COUNTY,
SOUTH CAROLINA.
CURRENT ADDRESS OF
PROPERTY: 1227 Wild Goose
Trail, Summerville, SC
29483-8023
TMS: 121-03-02-014.0000
TERMS OF SALE: The suc-
cessful bidder, other than the
Plaintiff, will deposit with the
Master In Equity, at conclu-
sion of the bidding, five per-
cent (5%) of his bid, in cash or
equivalent, as evidence of
good faith, same to be applied
to the purchase price in case
of compliance, but to be for-
feited and applied first to costs
and then to the Plaintiff's debt
in the case of non-compliance.
Should the last and highest
bidder fail to comply with the
other terms of the bid within
thirty (30) days, then the
Master In Equity may re-sell
the property on the same
terms and conditions on some
subsequent Sales Day (at the
risk of the said highest bid-
der). No personal or deficien-
cy judgment being demanded,
the bidding shall not remain

2013-CP-18-00519 - Cunningham

AFFIDAVIT OF PUBLICATION

the summerville
JOURNAL SCENE

State of South Carolina
County of Dorchester

Personally appeared before me the undersigned advertising
clerk of the above indicated newspaper published in the city
of Summerville, county and state aforesaid, who, being duly
sworn, says that the advertisement of

(copy attached)

appeared in the issues of said newspaper on the following
day(s):

2/12/16 Fri SJS 02/26/16 Fri SJW
2/19/16 Fri SJS
2/26/16 Fri SJS
2/12/16 Fri SJW
2/19/16 Fri SJW

Cost of \$226.45
Account# 224441
Order# 1416401
O. Number: 13-03642

Subscribed and sworn to before
me this 29th day
February
D. 2016

Stephanie Kruger
advertising clerk

Notary Public, SC
My commission expires

**BROCK
& SCOTT**

FILED - RECORDED

PLLC 2016 MAR -7 PM 4:13

Consumer Hotline
844-856-6646

Phone:
803-454-3540

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY
3800 Fernandina Road, Suite 110, Columbia, SC 29204
ConsumerContact@brockandscott.com
www.brockandscott.com

Fax:
803-454-3541

March 4, 2016

Dorchester County Clerk of Court
5200 East Jim Bilton Blvd.
Saint George, SC 29477

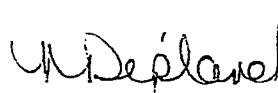
Re: Wells Fargo Bank, N.A. v. Richard B. Cunningham; Latisa L. Cunningham;
SC Housing Corp.; Drakesborough Homeowners Association, Inc., et al.
Case#: 2013-CP-18-00519
B&S file #: 13-03642

To Whom It May Concern:

Enclosed please find an original and one copy of an Affidavit of Publication with regard to the above referenced matter. Kindly file the same and return a clocked copy to me in the enclosed self-addressed stamped envelope.

Thank you in advance for your assistance in this matter.

Sincerely,



Nicole Depland
Legal Assistant
Brock & Scott, PLLC

Enclosures

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF

FILED - RECORDED

JUDICIAL CIRCUIT

2015 FEB 25 PM 1:00

CASE NO.:

2013-CP-18-00819

Wells Fargo

CHERYL BRADHAM

MOTION AND ORDER INFORMATION
FORM AND COVERSHEETCLERK OF COURT
DORCHESTER COUNTY

vs.

L. A. Cunningham

Defendant.

Plaintiff's Attorney:

Bar No.

Defendant's Attorney:

Bar No.

Address:

1227 Wild Goose Trail

Address:

Phone: Summerville Fax S.C. 29483

Phone:

Fax:

E-mail:

Other:

E-mail:

Other:

☐ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)☐ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion:

Estimated Time Needed:

Court Reporter Needed: ☐ YES/ ☐ NO

SECTION II: Motion/Order Type

☒ Written motion attached☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

Signature of Attorney for: ☒ Plaintiff / ☐ Defendant

Date submitted

, 20

SECTION III: Motion Fee

☐ PAID - AMOUNT: \$☐ EXEMPT:

(check reason)

☐ Rule to Show Cause in Child or Spousal Support☐ Domestic Abuse or Abuse and Neglect☐ Indigent Status ☐ State Agency v. Indigent Party☐ Sexually Violent Predator Act ☐ Post-Conviction Relief☐ Motion for Stay in Bankruptcy☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRPC)☐ Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions

Name of Court Reporter:

☐ Other:

JUDGE'S SECTION

☐ Motion Fee to be paid upon filing of the attached order.☐ Other:

JUDGE CODE

Date:

, 20

CLERK'S VERIFICATION

Collected by:

Date Filed:

, 20

☐ MOTION FEE COLLECTED: \$☐ CONTESTED - AMOUNT DUE: \$

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

Plaintiffs,

FILED - RECORD

2016 FEB 25 PM 1:58

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Case No. 2013-CP-18-00519

Vs.

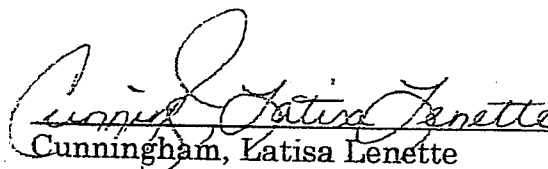
Latisa Lenette Cunningham

Defendant(s)

MOTION TO STAY OF SALE

I, Latisa moves this court for a Motion to Stay of Sale pursuant to the fact that a payment process has been tendered for the outstanding mortgage account.

I pray this court will grant this motion. This motion will be followed up with a Motion For Status Hearing to Show evidence of payment tendered.

 Executrix
Cunningham, Latisa Lenette

PRINT NAME: Cunningham, Latisa L. DATE: February 25, 2016

STATE OF SOUTH CAROLINA - RECORD
COUNTY OF DORCHESTER FEB 25 PM 2:03

WELLS FARGO BANK, N.A. CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY
Plaintiff,

MOTION TO STAY OF SALE

vs.

Latisa Lenette Cunningham

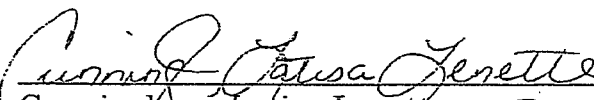
Case No. 2013-CP-18-00519

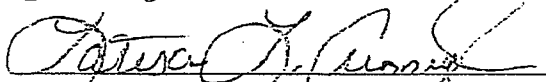
Defendant(s)

CERTIFICATE OF SERVICE

For the claim is with the knowledge I have sent a copy of the MOTION TO STAY OF SALE by Certified Mail, to the following location(s) on this 25th day of February, in the year 2016:

J. Martin Page, SC bar#: 100200
Brock & Scott, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210
[Attorney for Plaintiff]


Cunningham, Latisa Lenette Executrix


DBA LATISA LENETTE CUNNINGHAM
1227 Wild Goose Trl
Summerville, SC 29483

\$25.00 mb

✓

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF _____

FILED - RECORDS

JUDICIAL CIRCUIT

Wells Fargo

2016 FEB 25 PM } 50

CASE NO. 2013-CPC-218-00

519

CHERYL GRAMM

CLERK OF COURT

DORCHESTER COUNTY

MOTION AND ORDER INFORMATION
FORM AND COVERSHEET

vs.

✓ LATISA CUNNINGHAM

Defendant.

Plaintiff's Attorney: <u>Ed</u> Bar No. _____ Address: <u>1227 Wild Goose Trail</u> Phone: <u>Summerville</u> Fax <u>S.C. 29483</u> E-mail: _____ Other: _____		Defendant's Attorney: _____ Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____																	
☒ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) ☐ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) ☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)																			
SECTION I: Hearing Information Nature of Motion: _____ Estimated Time Needed: <u>15 min</u> Court Reporter Needed: ☒ YES / ☐ NO																			
SECTION II: Motion/Order Type ☒ Written motion attached ☐ Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <u>[Signature]</u> Signature of Attorney for ☒ Plaintiff / ☐ Defendant Date submitted _____, 20____																			
SECTION III: Motion Fee ☐ PAID - AMOUNT: \$ _____ ☐ EXEMPT: (check reason) <table border="0"> <tr> <td>☐ Rule to Show Cause in Child or Spousal Support</td> <td>☐ Domestic Abuse or Abuse and Neglect</td> </tr> <tr> <td>☐ Indigent Status</td> <td>☐ State Agency v. Indigent Party</td> </tr> <tr> <td>☐ Sexually Violent Predator Act</td> <td>☐ Post-Conviction Relief</td> </tr> <tr> <td>☐ Motion for Stay in Bankruptcy</td> <td>☐ Motion for Publication</td> </tr> <tr> <td>☐ Motion for Execution (Rule 69, SCRCPP)</td> <td>☐ Proposed order submitted at request of the court; or,</td> </tr> <tr> <td colspan="2">reduced to writing from motion made in open court per judge's instructions</td> </tr> <tr> <td colspan="2">Name of Court Reporter: _____</td> </tr> <tr> <td colspan="2">☐ Other: _____</td> </tr> </table>				☐ Rule to Show Cause in Child or Spousal Support	☐ Domestic Abuse or Abuse and Neglect	☐ Indigent Status	☐ State Agency v. Indigent Party	☐ Sexually Violent Predator Act	☐ Post-Conviction Relief	☐ Motion for Stay in Bankruptcy	☐ Motion for Publication	☐ Motion for Execution (Rule 69, SCRCPP)	☐ Proposed order submitted at request of the court; or,	reduced to writing from motion made in open court per judge's instructions		Name of Court Reporter: _____		☐ Other: _____	
☐ Rule to Show Cause in Child or Spousal Support	☐ Domestic Abuse or Abuse and Neglect																		
☐ Indigent Status	☐ State Agency v. Indigent Party																		
☐ Sexually Violent Predator Act	☐ Post-Conviction Relief																		
☐ Motion for Stay in Bankruptcy	☐ Motion for Publication																		
☐ Motion for Execution (Rule 69, SCRCPP)	☐ Proposed order submitted at request of the court; or,																		
reduced to writing from motion made in open court per judge's instructions																			
Name of Court Reporter: _____																			
☐ Other: _____																			
JUDGE'S SECTION ☐ Motion Fee to be paid upon filing of the attached order. ☐ Other: _____		JUDGE CODE _____ Date: _____, 20____																	
CLERK'S VERIFICATION Collected by: _____ Date Filed: _____, 20____ ☐ MOTION FEE COLLECTED: \$ _____ ☐ CONTESTED - AMOUNT DUE: \$ _____																			

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

FILED - RECORD
2016 FEB 25 PM 1:58

CHERYL GRAMAM
CLERK OF COURT
DORCHESTER COUNTY

Plaintiffs,

Case No. 2013-CP-18-00519

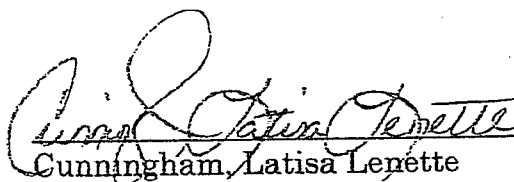
Vs.

Latisa Lenette Cunningham

Defendant(s)

MOTION FOR STATUS HEARING

I, Latisa moves this court for Motion For Status Hearing to show evidence of tender of payment to satisfy the outstanding account.

 Executrix
Cunningham, Latisa Lenette

PRINT NAME: Cunningham, Latisa L DATE: February 25, 2016

FILED - RECORD

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

2016 FEB 25 PM 2:03

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

WELLS FARGO BANK, N.A.

MOTION FOR STATUS HEARING

Plaintiff,

vs.

Case No. 2013-CP-18-00519

Latisa Lenette Cunningham

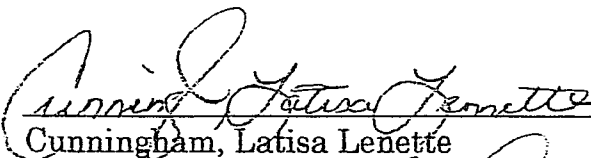
Defendant(s)

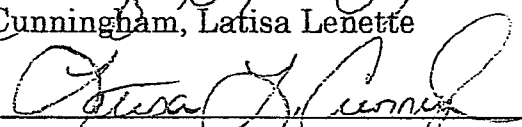
CERTIFICATE OF SERVICE

For the claim is with the knowledge I have sent a copy of the MOTION FOR STATUS HEARING by Certified Mail, to the following location(s) on this 25th day of February, in the year 2016:

Party (s) Served:

J. Martin Page, SC bar#: 100200
Brock & Scott, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210
[Attorney for Plaintiff]

 Executrix
Cunningham, Latisa Lenette


DBA LATISA LENETTE CUNNINGHAM
1227 Wild Goose Trl
Summerville, SC 29483

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

Wells Fargo Bank, N.A.,

Plaintiff,

vs.

Richard B. Cunningham; Latisa L.
Cunningham; SC Housing Corp.;
Drakesborough Homeowners Association,
Inc.,

Defendant(s).

IN THE COURT OF COMMON PLEAS
CASE NO. 2013-CP-18-00519

SUPPLEMENTAL MEMORANDUM

FILED - RECORDED
2016 FEB 12 PM 10:00
CHERYL GARNETT
CLERK OF COURT
DORCHESTER COUNTY

I. INTRODUCTION AND FACTS

The action is one for foreclosure of real estate located in Dorchester County, South Carolina. The action was filed on March 26, 2013. Latisa L. Cunningham filed an Answer to Summons and Complaint on October 13, 2014. An order granting the Plaintiff's Motion for Summary Judgment was granted on May 4, 2015. The Defendant filed a Notice of Appeal of Summary Judgment on June 3, 2015. On December 2, 2015, the Defendant's appeal was dismissed for failure to correct the deficiencies of her initial brief as required under Rule 208 of the South Carolina Court of Appeals. The Court of Appeals then waited fifteen days before sending the remittitur to the lower court as required under Rule 221 (b) of the South Carolina Appellate Court Rules. As the Defendant failed to file a petition for rehearing within fifteen days the South Carolina Court of Appeals mailed the Dorchester County Clerk of Court a copy of the order dismissing the case along with a remittitur as required by Rule 221(b). At a supplemental hearing held on January 27, 2016 the Master in Equity raised a question as to whether there was any post remittitur procedure that needed to occur before he could schedule the foreclosure sale of the property.

II. DISCUSSION

SCACR Rule 260 (a) provides that, “[w]henver it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court. A case shall not be reinstated except by leave of the court, upon good cause shown, after notice to all parties. The clerk shall remit the case to the lower court or administrative tribunal in accordance with Rule 221 unless a motion to reinstate the appeal has been actually received by the court within fifteen (15) days of filing of the order of dismissal (the day of filing being excluded)”. The Defendant’s case was dismissed pursuant to 260 (a) and said dismissal acts as an order of the appellate court. The rules additionally provide that when a dismissal occurs a remittitur will be provided in accordance with Rule 221 of the South Carolina Appellate Court Rules.

SCACR Rule 221 stipulates that, “The remittitur shall contain a copy of the judgment of the appellate court, shall be sealed with the seal and signed by the clerk of the court, and unless otherwise ordered by the court shall not be sent to the lower court or administrative tribunal until fifteen (15) days have elapsed (the day of filing being excluded) since the filing of the opinion, order, judgment, or decree of the court finally disposing of the appeal. If a petition for rehearing is received before the remittitur is sent, the remittitur shall not be sent pending disposition of the petition by the court. Where a petition for rehearing has been denied, the Court of Appeals shall not send the remittitur to the lower court or administrative tribunal until the time to petition for a writ of certiorari under Rule 242(c) has expired. If a petition for writ of certiorari is filed, the Court of Appeals shall not send the remittitur until notified that the petition has been denied. If the writ is granted by the Supreme Court, the Court of Appeals shall not send the remittitur.”

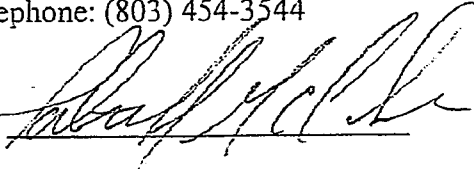
The defendant did not file a petition for a rehearing within the fifteen days as required by the rules. As such the South Carolina Court of Appeals mailed the Clerk of Court for Dorchester a copy of the judgment along with the remittitur as required by Rule 221(b) thereby transferring jurisdiction back to the Dorchester County Master in Equity. Proof of this is found in the letter that was sent to the Defendant on January 7, 2016. In this letter the South Carolina Court of Appeals notifies the Defendant that because her motion for reconsideration was not received within the fifteen days of the dismissal that the remittitur was sent to trial court and the South Carolina Court of Appeals no longer has jurisdiction to act. **Attached as Exhibit "1"**

Noticeably absent from the South Carolina Appellate Court Rules are instructions regarding post remittitur procedure. If the court was to require any post remittitur procedures one would expect to find them within the South Carolina Appellate Court Rules or the South Carolina Rules of Civil Procedure. The lack of any additional procedures denotes that once the remittitur has been filed the case is restored to an active status with the trial court

III. CONCLUSION

Since that the case has been properly remitted to the trial court and there are no post remittitur procedures that need to occur, it is proper for the Master in Equity to schedule the property for public auction in accordance with the Order and Judgment of Foreclosure and Sale.

Brock & Scott PLLC
3800 Fernandina Road, Suite 110
Columbia, South Carolina 29210
Telephone: (803) 454-3544

By: 

Patrick A. McCabe
Attorney for the Plaintiff

BROCK & SCOTT PLLC

COLUMBIA OFFICE

WESTPARK CENTER
3800 FERNANDINA ROAD
SUITE 110
COLUMBIA, SC
PHONE 803-454-3540
FAX 803-454-3541

www.brockandscott.com

RECEIVED

FEB 03 2016

Cheryl Graham, Clerk of Court
Dorchester County, SC

ATLANTA, GA
CHARLOTTE, NC
RALEIGH, NC
WILMINGTON, NC
WINSTON-SALEM, NC
COLUMBIA, SC
FRANKLIN, TN

THOMAS E. BROCK *
GREGORY A. SCOTT *
JAMES P. BONNER *
MARK A. PEARSON **
BRIAN L. CAMPBELL **
SEAN M. CORCORAN *

* Licensed in North Carolina

** Licensed in North Carolina and South Carolina

February 1, 2016

Cheryl Graham
Dorchester County Clerk of Court
5200 East Jim Bilton Blvd.
Saint George, SC 29477

RE: Wells Fargo Bank, N.A. v. Latisa L. Cunningham; Richard B. Cunningham; Drakesborough
Homeowners Association, Inc.; SC Housing Corp.,
Case No.: 2013-CP-18-00519
B&S No: 13-03642

Enclosed please find an original Supplemental Memorandum with two copies of the same in the above referenced matter. If the document is in order, please arrange to have it signed, file the originals and return the clocked copies to me in the enclosed envelope.

Should you have any questions or concerns, please contact me at (803) 454-3540.

Respectfully,

Cather Mark

Legal Assistant
Brock & Scott, PLLC

Carolyn
This has a notice of
Sale for March that
I have not mailed
a copy yet.

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

Plaintiffs,

Vs.

Latisha Lenette Cunningham

Defendant(s)

JUDICIAL NOTICE

Please take Judicial Notice:

1. I am an American Citizen and not a US Citizen.
2. Any Contracts that indentify me as a US Citizen is void, because it would have be signed without full disclosure.
3. This Court lacks Jurisdiction, because I am not a US Citizen.
4. This Court is Administrating my Estate without my Consent. This is trespassing.
5. I have appointed Wright, Ronald Allen as Power of Attorney over my Estate. He is the only one that has any authority to handle any of my Commercial affairs of my Estate.
6. For this Court to move any further will be considered treason.

Latisha Lenette Cunningham Executrix
Cunningham, Latisha Lenette

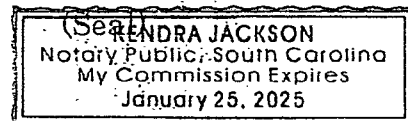
PRINT NAME

Cunningham, Latisha Lenette DATE: January 25, 2016

Subscribe and sworn to (or affirmed) before me on this 25 day of January, 2016, by Cunningham, Latisha Lenette proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

[Signature]
NOTARY PUBLIC

My Commission Expires: 1-25-2025



STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

JUDICIAL NOTICE

Plaintiff,

vs.

Latisa Lenette Cunningham

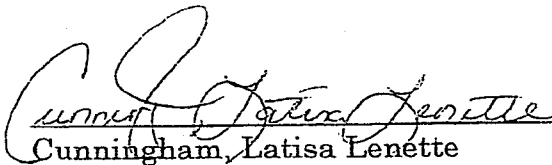
Defendant(s)

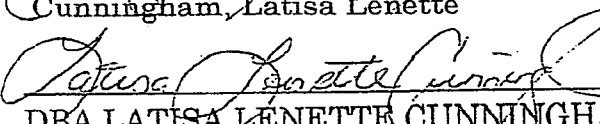
CERTIFICATE OF SERVICE

For the claim is with the knowledge I have sent a copy of the JUDICIAL NOTICE by Certified Mail, to the following location(s) on this 27th day of January, in the year 2016:

J. Martin Page, SC bar#: 100200
Brock & Scott, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210
[Attorney for Plaintiff]

FILED - RECORDED
2016 JAN 27 AM 9:53
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

 Executrix
Cunningham, Latisa Lenette


DBA LATISA LENETTE CUNNINGHAM
1227 Wild Goose Trl
Summerville, SC 29483

2015-CP-18-00011

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER
WELLS FARGO BANK, N.A.

FILED - RECORDED
2016 JAN 27 AM 9:54
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

Plaintiffs,

Vs.

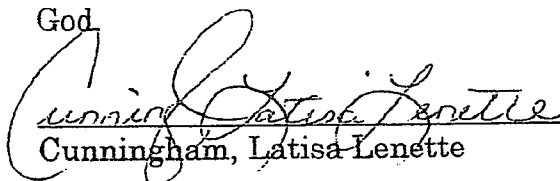
✓ Latisa Lenette Cunningham

Defendant(s)

NOTICE OF CITIZENSHIP

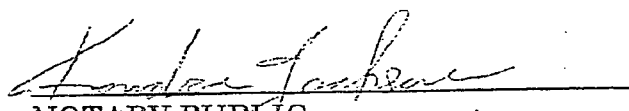
Please take Notice that I, Cunningham, Latisa Lenette am an American Citizen, and not a US Citizen. Any contract that ties me into being a US Citizen such as a Social Security Number, Drivers License etc... is void, because it was not signed with full disclosure indicating that I was waving my unalienable rights as an American. I am not an artificial person.

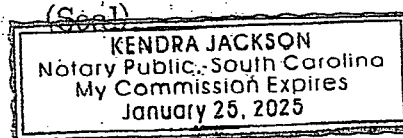
I have stated true, correct and complete facts to the best of my knowledge and ability under penalty of perjury in the NOTICE OF CITIZENSHIP, So Help Me God

 Exeuctrix
Cunningham, Latisa Lenette

PRINT NAME Cunningham, Latisa Lenette DATE: January 25, 2016

Subscribe and sworn to (or affirmed) before me on this 25 day of January, 2016, by Cunningham, Latisa Lenette proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.


NOTARY PUBLIC
My Commission Expires: January 25, 2025



STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

NOTICE OF CITIZENSHIP

Plaintiff,

vs.

Latisa Lenette Cunningham

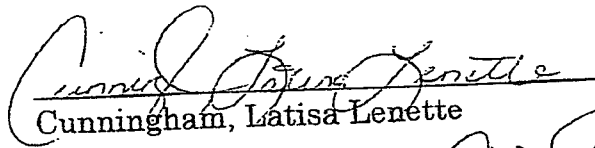
Defendant(s)

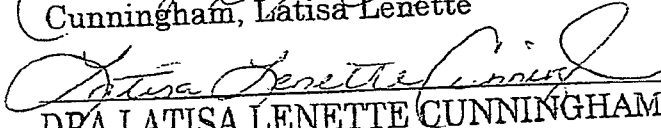
CERTIFICATE OF SERVICE

For the claim is with the knowledge I have sent a copy of the NOTICE OF CITIZENSHIP by Certified Mail, to the following location(s) on this 27th day of January, in the year 2016:

J. Martin Page, SC bar#: 100200
Brock & Scott, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210
[Attorney for Plaintiff]

FILED - RECORDED
2016 JAN 27 AM 9:54
SHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY


Cunningham, Latisa Lenette Executrix


DBA LATISA LENETTE CUNNINGHAM
1227 Wild Goose Trl
Summerville, SC 29483

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

WELLS FARGO BANK, N.A.

Plaintiffs,

Vs.

Latisa Lenette Cunningham

Defendant(s)

OBJECTION TO PLAINTIFF SUPPLEMENTARY JUDGMENT

I, Latisa Objects to the Plaintiff Motion for Supplementary Judgment for the following reasons:

1. As an American Citizen this is a Foreign Jurisdiction to me. This Court does not have jurisdiction over me.
2. I am not a US Citizen, which means if the Plaintiff moves forward with a Motion they will be violating my unalienable rights.

In conclusion, the claim the Plaintiff has must be discharged with the proper IRS Forms. I pray that this Court denies the Plaintiff Motion

I have stated true, correct and complete facts to the best of my knowledge and ability under penalty of perjury in the OBJECTION TO PLAINTIFF SUPPLEMENTARY JUDGMENT, So Help Me God.

Cunningham, Latisa Lenette Executrix
Cunningham, Latisa Lenette

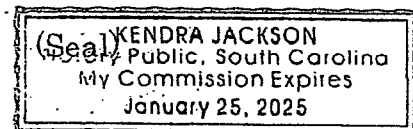
PRINT NAME

Cunningham, Latisa Lenette DATE: January 25, 2016

Subscribe and sworn to (or affirmed) before me on this 25th day of January, 2016, by Cunningham, Latisa Lenette proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Kendra Jackson
NOTARY PUBLIC

My Commission Expires: January 25, 2025



FILED - RECORD

2016 JAN 27 AM 10:00

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

WELLS FARGO BANK, N.A.

OBJECTION TO PLAINTIFF
SUPPLEMENTARY JUDGMENT

Plaintiff,

vs.

Latisa Lenette Cunningham

Defendant(s)

CERTIFICATE OF SERVICE

For the claim is with the knowledge I have sent a copy of the **OBJECTION TO
PLAINTIFF SUPPLEMENTARY JUDGMENT**
by Certified Mail, to the following location(s) on this 27th day of January, in
the year 2016:

J. Martin Page, SC bar#: 100200
Brock & Scott, PLLC
3800 Fernandina Road Suite 110
Columbia, SC 29210
[Attorney for Plaintiff]

Cunningham, Latisa Lenette Executrix
Cunningham, Latisa Lenette

Latisa Lenette Cunningham
DBA LATISA LENETTE CUNNINGHAM
1227 Wild Goose Trl
Summerville, SC 29483

AFFIDAVIT OF FACTS CONCERNING AMERICAN CITIZEN

I, Cunningham, Latisa Lenette is a living breathing self-aware woman and am an American citizen and not U.S. Citizen

1. An American Citizen is the natural living breathing person known as Cunningham, Latisa. American Citizens has unalienable rights.
2. An U.S. Citizen is an entity/ artificial person known as LATISA LENETTE CUNNINGHAM. U.S. Citizens have no rights, but privileges.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 25, 2016. Cunningham, Latisa Lenette
Cunningham, Latisa Lenette

WITNESSES:

BY: Alice Lucas

PRINT NAME: Alice Lucas DATE: 1/25/16

BY: Dwight Lucas

PRINT NAME: Dwight Lucas DATE: 1/25/16

FILED - RECORD
2016 JAN 27 AM 9:57
SHERYL GRAMHAM
CLERK OF COURT
DORCHESTER COUNTY

Subscribe and sworn to (or affirmed) before me on this 25 day of January, 2016, by Cunningham, Latisa Lenette proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Kendra Jackson
NOTARY PUBLIC

My Commission Expires: January 25, 2025

(Seal)
KENDRA JACKSON
Notary Public, South Carolina
My Commission Expires
January 25, 2025

AMENDED

NOTICE OF SALE

NOTICE OF SALE CIVIL ACTION NO. 2013-CP-18-00519 BY VIRTUE of the decree heretofore granted in the case of: Wells Fargo Bank, N.A. vs. Richard B. Cunningham; Latisha L. Cunningham; SC Housing Corp.; Drakesborough Homeowners Association, Inc., the undersigned Master In Equity for Dorchester County, South Carolina, will sell on March 1, 2016 at 11:00AM, at the Dorchester County Courthouse, City of Saint George, State of South Carolina, to the highest bidder:

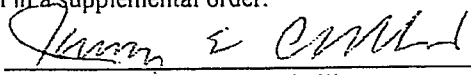
ALL THAT CERTAIN PIECE, PARCEL OR LOT OF LAND, TOGETHER WITH ALL IMPROVEMENTS THEREON, SITUATE, LYING AND BEING IN THE COUNTY OF DORCHESTER, STATE OF SOUTH CAROLINA, KNOWN AND DESIGNATED AS LOT 272, OF DRAKESBOROUGH SUBDIVISION, IN THE JEDBURG COMMUNITY, AS SHOWN ON THAT CERTAIN PLAT ENTITLED: "FINAL PLAT SHOWING THE SUBDIVISION OF LOTS 99-115, LOTS 272-284, A PORTION OF HOA 1 AND HOA 4 OF PHASE 1, DRAKESBOROUGH SUBDIVISION FROM TRACT WITH TMS# 121-00-00-330, LOCATED IN THE JEDBURG COMMUNITY, DORCHESTER COUNTY, SOUTH CAROLINA", PREPARED BY MARK ELLIS LAMB, PLS, 23200, OF AEGIS LAND SURVEYING, INC. DATED AUGUST 17, 2007, REVISED OCTOBER 8, 2007, AND RECORDED NOVEMBER 7, 2007, IN PLAT CABINET L, AT PAGE 83, IN THE OFFICE OF THE REGISTER OF DEEDS FOR DORCHESTER COUNTY, SOUTH CAROLINA. FOR A MORE COMPLETE DESCRIPTION OF SAID LOT, REFERENCE MAY BE HAD TO THE AFOREMENTIONED PLAT OF RECORD.

BEING THE SAME PROPERTY CONVEYED TO RICHARD B. CUNNINGHAM AND LATISA L. CUNNINGHAM HEREIN BY DEED OF BEAZER HOMES CORP., A TENNESSEE CORPORATION, DATED NOVEMBER 24, 2008 AND RECORDED NOVEMBER 26, 2008 IN DEED BOOK 6871 AT PAGE 58. THEREAFTER, THE SAME PROPERTY WAS CONVEYED TO LATISA L. CUNNINGHAM BY DEED OF RICHARD B. CUNNINGHAM DATED MARCH 14, 2013 AND RECORDED MARCH 15, 2013 IN DEED BOOK 8728 AT PAGE 153 IN THE OFFICE OF THE REGISTER OF DEEDS FOR DORCHESTER COUNTY, SOUTH CAROLINA.

CURRENT ADDRESS OF PROPERTY: 1227 Wild Goose Trail, Summerville, SC 29483-8023
TMS: 121-03-02-014.000C

TERMS OF SALE: The successful bidder, other than the Plaintiff, will deposit with the Master In Equity, at conclusion of the bidding, five percent (5%) of his bid, in cash or equivalent, as evidence of good faith, same to be applied to the purchase price in case of compliance, but to be forfeited and applied first to costs and then to the Plaintiff's debt in the case of non-compliance. Should the last and highest bidder fail to comply with the other terms of the bid within thirty (30) days, then the Master In Equity may re-sell the property on the same terms and conditions on some subsequent Sales Day (at the risk of the said highest bidder). No personal or deficiency judgment being demanded, the bidding shall not remain open after the date of sale and shall be final on that date, and compliance with the bid may be made immediately. Purchaser to pay for documentary stamps on the Deed. The successful bidder will be required to pay interest on the amount of the balance of the bid from date of sale to date of compliance with the bid at the rate of 6% per annum. The sale shall be subject to taxes and assessments, existing easements and restrictions, easements and restrictions of record and any other senior encumbrances.

In the event an agent of Plaintiff does not appear at the time of sale, the within property shall be withdrawn from sale and sold at the next available sales date upon the terms and conditions as set forth in the Judgment of Foreclosure and Sale or such terms as may be set forth in a supplemental order.


The Honorable James E. Chellis
Master In Equity for Dorchester County

2/16/2016

Brock & Scott, PLLC
3800 Fernandina Road, Suite 110
Columbia, SC 29210
Attorneys for Plaintiff
13-03642

FILED - RECORDED
2016 FEB 12 AM 10:00
CHERYL GRAHAM
CLERK OF COURT
DORCHESTER COUNTY

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

FILED-RECORDED IN THE COURT OF COMMON PLEAS
C/A NO.: 2013-CP-18-00519
2016 JAN 15 AM 11:39

✓ Wells Fargo Bank, N.A.,
Plaintiff,

CHERYL C. GIBBARD
CLERK OF COURT
DORCHESTER COUNTY

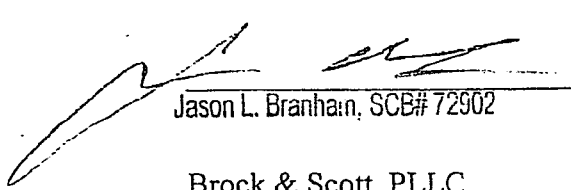
vs.

Richard B. Cunningham; Latisa L. Cunningham; SC
Housing Corp.; Drakesborough Homeowners
Association, Inc.,
Defendant(s).

**NOTICE OF SUPPLEMENTAL
HEARING**

YOU WILL PLEASE TAKE NOTICE THAT, by virtue of the Order of Reference issued in the above-entitled cause, The Honorable James E. Chellis, Master In Equity for Dorchester County, has appointed January 27, 2016 at 10:00AM at 5200 East Jim Bilton Boulevard, Saint George, SC 29477, as the time and place for holding a Final Hearing in Foreclosure, at which time and place all interested parties will appear, and that the Plaintiff intends to prepare and submit a Record of Hearing containing written testimony. The Master In Equity will be authorized to enter a final judgment and to order the judicial sale of the property subject to foreclosure herein.

You are requested to notify Brock & Scott, PLLC at phone number (803) 454-3540 of your intention to appear.


Jason L. Branham, SCE# 72902

Brock & Scott, PLLC
Westpark Center
3800 Fernandina Road Suite 110
Columbia, SC 29210
Phone 803-454-3540 Fax 803-454-3541
Attorneys for Plaintiff

Dated: January 13, 2016
Columbia, South Carolina

13-03642 FC01



STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

Wells Fargo Bank, N.A.,
Plaintiff,

vs.

Richard B. Cunningham; Latisa L. Cunningham; SC Housing
Corp.; Drakesborough Homeowners Association, Inc.,
Defendant(s).

IN THE COURT OF COMMON PLEAS

FILED - RECORDED/A NO.: 2013-CP-18-00519

2016 JAN 15 AM 11:39

CREATED BY
CLERK OF COURT
CERTIFICATE OF SERVICE BY MAIL
DORCHESTER COUNTY

The undersigned hereby certifies that he/she is an employee of Brock & Scott, PLLC, and is a person of such age and discretion as to be competent to serve papers.

That on the 13th day of January, 2016, he/she served a copy of the Notice of Supplemental Hearing by placing said copy in a postage paid envelope addressed to each of the following persons at the address stated below, which is the last known address, and by depositing said envelope and contents in the U.S. Mail.

Pleading: Notice of Supplemental Hearing
Party (ies) Served:

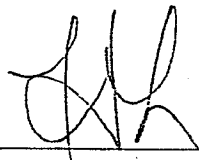
Occupant(s)
1227 Wild Goose Trail
Summerville, SC 29483

Sara J. Volk
Attorney for SC Housing Corp.
300-C Outlet Pointe Boulevard
Columbia, SC 29210

Maria E. Kiehling
Attorney for Drakesborough Homeowners Association, Inc.
652 Coleman Blvd., Suite 200
Mount Pleasant, SC 29464

Latisa L. Cunningham
1227 Wild Goose Trail
Summerville, SC 29483

Richard B. Cunningham
9551 Palmetto Commerce Parkway
Ladson, SC 29456



Brock & Scott, PLLC

Columbia, South Carolina

*** THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU HAVE BEEN DISCHARGED IN A CHAPTER SEVEN BANKRUPTCY, WE ARE NOT SEEKING PERSONAL LIABILITY AGAINST YOU, BUT ARE PURSUING THE RIGHTS AGAINST THE PROPERTY AS PROVIDED IN THE SECURITY AGREEMENTS***

**BROCK
& SCOTT
PLLC**

COLUMBIA OFFICE

WESTPARK CENTER
3800 FERNANDINA ROAD
SUITE 110
COLUMBIA, SC 29210
PHONE 803-454-3540
FAX 803-454-3541

www.brockandscott.com

THOMAS E. BROCK *
GREGORY A. SCOTT *
JAMES P. BONNER *
MARK A. PEARSON **
BRIAN L. CAMPBELL **
SEAN M. CORCORAN *

* Licensed in North Carolina

** Licensed in North Carolina and South Carolina

LED-RECORDED
2016 JAN 15 AM 11:39

CHERYL GRANT
CLERK OF COURT
DORCHESTER COUNTY

ATLANTA, GA
CHARLOTTE, NC
RALEIGH, NC
WILMINGTON, NC
WINSTON-SALEM, NC
COLUMBIA, SC
FRANKLIN, TN

January 13, 2016

Dorchester County Clerk of Court
5200 East Jim Bilton Blvd.
Saint George, SC 29477

RE: Wells Fargo Bank, N.A. v. Richard B. Cunningham, *et al.*
Case Number: 2013-CP-18-00519
B&S File No.: 13-03642 FC01

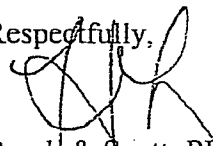
Dear Dorchester County Clerk of Court:

Enclosed please find an original and one copy of the Notice of Supplemental Hearing with Certificate of Service by Mail regarding the above referenced matter.

Please file same and return the clocked copy to the undersigned in the envelope provided.

Thank you for your kind assistance in this matter.

Respectfully,


Brock & Scott, PLLC

Enclosures

**BROCK
& SCOTT
PLLC**

COLUMBIA OFFICE

WESTPARK CENTER
3800 FERNANDINA ROAD
SUITE 110
COLUMBIA, SC 29210
PHONE 803-454-3540
FAX 803-454-3541

www.brockandscott.com

THOMAS E. BROCK *
GREGORY A. SCOTT *
JAMES P. BONNER *
MARK A. PEARSON **
BRIAN L. CAMPBELL **
SEAN M. CORCORAN *

* Licensed in North Carolina

** Licensed in North Carolina and South Carolina

ATLANTA, GA
CHARLOTTE, NC
RALEIGH, NC
WILMINGTON, NC
WINSTON-SALEM, NC
COLUMBIA, SC
FRANKLIN, TN

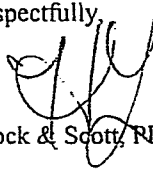
January 13, 2016

To All Interested Parties:

RE: Wells Fargo Bank, N.A. v. Latisa L. Cunningham and Richard B. Cunningham, et al.
Case Number: 2013-CP-18-00519
B&S File No.: 13-03642 FC01

Please find enclosed herewith and served upon you the Notice of Supplemental Hearing which includes the date, time and location of the final foreclosure hearing in the above referenced matter. Please read the document carefully and notify us at (803) 454-3540 if you plan to attend the hearing.

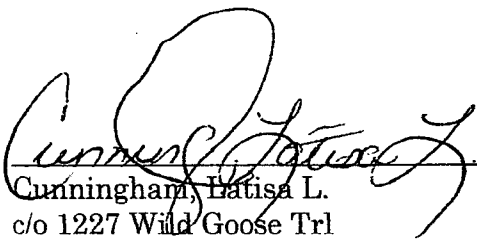
Respectfully,



Brock & Scott, PLLC

Enclosures

*** THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU HAVE BEEN DISCHARGED IN A CHAPTER SEVEN BANKRUPTCY, WE ARE NOT SEEKING PERSONAL LIABILITY AGAINST YOU, BUT ARE PURSUING THE RIGHTS AGAINST THE PROPERTY AS PROVIDED IN THE SECURITY AGREEMENTS***



Cunningham, Latisa L.
c/o 1227 Wild Goose Trl
Summerville, South Carolina Republic [29485]

10.15.17
Date

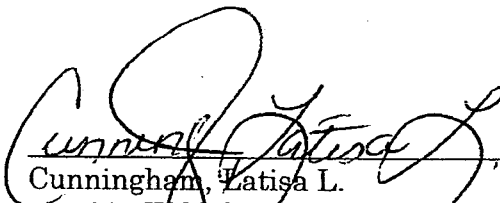
CERTIFICATE OF COUNSEL

I, Latisa Cunningham certify that the Second Amended Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

RECEIVED

JUN 16 2017

SC Court of Appeals


Cunningham, Latisa L.
c/o 1227 Wild Goose Trl
Summerville, South Carolina Republic [29485]

6-15-17
Date