

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable James E. Chellis, Master in Equity

Appellate Case No. 2017-002169
Circuit Court Case No. 2013-CP-18-00519

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OCT 25 2017

SC Court of Appeals
Petitioner,

American Homes 4 Rent Properties Ten, LLC

In Re:

Wells Fargo Bank, N.A., Respondent,

v.

Richard B. Cunningham; Latisa L. Cunningham; SC Housing
Corp.; and Drakesborough Homeowner Association, Inc., Defendants,

of whom

Latisa L. Cunningham is the Appellant.

JOINDER TO MOTION TO DISMISS

This appeal arises out of the same underlying litigation from which *Wells Fargo Bank, NA v. Cunningham*, Appellate Case No. 2016-000704, arose. The Court recently affirmed its dismissal of that appeal and denied Ms. Cunningham’s petition for rehearing in that matter.

This appeal appears to be nothing more than yet another stall tactic and abuse of the judicial system that all of Ms. Cunningham’s other Sovereign Citizen-style filings have been. Accordingly, to the limited extent that it is even a party to this appeal, Wells Fargo respectfully joins the motion to dismiss recently filed by American Homes 4 Rent Properties Ten, LLC.¹

¹ The property underlying this foreclosure action has been sold to American Homes 4 Rent by way of judicial sale. American Homes 4 Rent was the winning bidder, but Ms. Cunningham refuses to leave the property and continues to file frivolous materials in order to stall her

Respectfully submitted,

WOMBLE CARLYLE SANDRIDGE & RICE, LLP

By: 

S. Sterling Laney, III
S.C. Bar No. 6933
550 South Main Street, Suite 400
Greenville, South Carolina 29601
(864) 255-5400
slaney@wcsr.com

M. Todd Carroll
S.C. Bar No. 74000
1221 Main Street, Suite 1600
Columbia, South Carolina 29201
(803) 454-6504
todd.carroll@wcsr.com

Attorneys for Wells Fargo Bank, N.A.

October 24, 2017

eviction. Upon information and belief, Wells Fargo no longer has an active role in this matter. To the extent it does, though, it certainly wants to be on record requesting that the Court dismiss this untimely and frivolous appeal.

PROOF OF SERVICE

I, the undersigned Legal Secretary of the law offices of Womble Carlyle Sandridge & Rice LLP, Attorneys for Wells Fargo Bank, N.A., do hereby certify that I have served the below parties in this action with a copy of the pleading(s) specified below by mailing a copy of the same, postage prepaid, to the following address(es):

Pleading: Joinder to Motion to Dismiss

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

Appellant

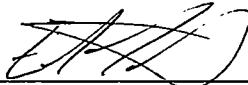
Thomas I. Howard, Jr.
Brownlee Whitlow Praet & File, PLLC
3255 Landmark Drive, Suite 301
North Charleston, SC 29418

Counsel for Petitioner

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Edwin T. Mathis

October 24, 2017



1221 Main Street
Suite 1600
Columbia, SC 29201

Telephone: (803) 454-6504
www.wcsr.com

Direct Dial: 803-454-7730
Direct Fax: 803-381-9130
E-mail: Todd.Carroll@wcsr.com

October 24, 2017

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

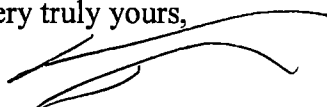
Re: American Hames 4 Rent Properties Ten, LLC (In re: Wells Fargo v. Cunningham)
Appellate Case No. 2017-002169

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Wells Fargo's Joinder to Motion to Dismiss. Please file the originals and return a stamped copy to us in the enclosed envelope. Thank you.

With kind regards, I remain

Very truly yours,


M. Todd Carroll

MTC/tm
Enclosures

cc: Latisa L. Cunningham
Thomas I. Howard, Jr. Esq.

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