

**THE STATE OF SOUTH CAROLINA**

In The Court of Appeals

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APPEAL FROM OCONEE COUNTY

Court of Common Pleas

Steven C. Kirven, Master-in-Equity

Case No. 2011 - CP - 36 - 1056

Case No. 2017-000886

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Federal National Mortgage Association, Respondent,

v.

John D. Dalen, Julie A. Dalen

And Wawtockace Hills Property Owners Association, Defendants

Of whom John D. Dalen and Julie A. Dalen are the Appellants

And

John D. Dalen and Julie A. Dalen, Appellants,

v.

Bank of America, N.A., Successor by merger to

BAC Home Loans Servicing, L.P. f/k/a

Countrywide Home Loans Servicing, L.P., Respondent

**RECEIVED**

FEB 07 2018

SC Court of Appeals

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**Second Objection to Plaintiff's Petition and Motion to Deny**

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Appellants John and Julie Dalen file this Second Objection to Plaintiff's AMENDED CERTIFICATE OF SERVICE and PETITION TO SUBSTITUTE COUNSEL of February 1, 2018 because once again we have not received proper notice due to improper service. And as well, the Amended Certificate of Service does not match the attached petition and once again it is misleading and confusing and leads appellants to question exactly what is being petitioned. Plaintiff's amended certificate of service has only been partially corrected and the header still

does not comply with the court's deficiency notice. Furthermore, it again purports to have served on appellants a petition to substitute plaintiff. The attached petition requests a substitute of counsel.

Appellants strongly object to any substitution of plaintiff. Appellants believe that our interests as well as the interests of the plaintiffs would be better served by retaining existing counsel unless such counsel cannot possibly continue in this case.

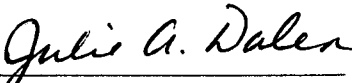
WHEREFORE, we are requesting the court to deny plaintiff's petition to substitute counsel.

February 5, 2018

John D. Dalen and Julie A. Dalen  
Appearing Pro Per / Appellant(s)

  
\_\_\_\_\_  
John D. Dalen

109 Wood Valley Drive  
Westminster, SC 29693  
Ph. 864.647.4705

  
\_\_\_\_\_  
Julie A. Dalen

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM OCONEE COUNTY

Court of the Master in Equity

The Honorable Steven C. Kirven, Master in Equity

Case No.: 2011-CP-37-01056

APPELLATE CASE No.: 2017-000886

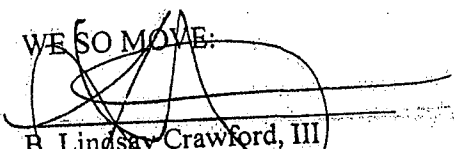
Federal National Mortgage Association.....Respondent,  
John D. Dalen, Julie A. Dalen and Wawtockace Hills Property Owners Association, Defendant,  
Of whom John D. Dalen and Julie A. Dalen are the.....Appellants.

PETITION TO SUBSTITUTE COUNSEL


Pursuant to the provisions of SCACR 264 (b), Plaintiff moves the Court for an Order Substituting Counsel in this action. Plaintiff consents to the substitution.

Plaintiff petitions the court to substitute Sara C. Hutchins of the law firm of Crawford & von Keller, LLC in the place of previous counsel Charles Stuart Gwynne, Jr..

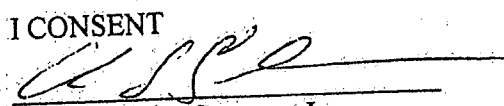
WE SO MOVE:

  
B. Lindsay Crawford, III  
Theodore von Keller  
Sara C. Hutchins  
B. Lindsay Crawford, IV  
Crawford & von Keller, LLC

I CONSENT

  
Federal National Mortgage Association  
By: Sara C. Hutchins  
Its: Substituted counsel, with permission

I CONSENT

  
Charles Stuart Gwynne, Jr.  
SC Bar# 73844

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
APPEAL FROM OCONEE DIVISION

Case Number: 2011-CP-37-01056

Appellate Case No.: 2017-000886

Federal National Mortgage Association )

Plaintiff, )

vs. )

John D. Dalen; Julie A. Dalen; )  
Wawtockace Hills Property Owners )  
Association; Bank of America, N.A. )  
successor by merger to BAC Home )  
Loans Servicing, L.P. f/k/a )  
Countrywide Home Loans Servicing, )  
L.P. )

Defendants. )

AMENDED CERTIFICATE OF  
SERVICE

I, Sara C. Hutchins, an employee of Crawford & von Keller, LLC, do hereby certify that on this date, I served a copy of the **PETITION TO SUBSTITUTE PLAINTIFF** on pro se Defendant 1 listed below, by causing the same to be placed in a sealed envelope, first-class postage pre-paid, and deposited in the United States Mail on the said date, addressed as follows:

John D. Dalen and Julie A. Dalen  
109 Wood Valley Drive  
Westminster, SC 29693

Brian A. Calub, Esq.  
Attorney for Respondent Bank of America, NA  
McGuire Woods LLP  
Fifth Third Center  
201 North Tryon Street, Suite 3000  
Charlotte, NC 28202

  
Sara C. Hutchins

February 1, 2018

**THE STATE OF SOUTH CAROLINA**

In The Court of Appeals

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APPEAL FROM OCONEE COUNTY

Court of Common Pleas

Steven C. Kirven, Master-in-Equity

Case No. 2011 - CP - 36 - 1056

Case No. 2017-000886

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Federal National Mortgage Association, Respondent,

v.

John D. Dalen, Julie A. Dalen

And Wawtockace Hills Property Owners Association, Defendants

Of whom John D. Dalen and Julie A. Dalen are the Appellants

And

John D. Dalen and Julie A. Dalen, Appellants,

v.

Bank of America, N.A., Successor by merger to

BAC Home Loans Servicing, L.P. f/k/a

Countrywide Home Loans Servicing, L.P., Respondent

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SC Court of Appeals

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**Certificate of Service for Appellants' Second Objection  
to Plaintiff's Petition and Motion to Deny**

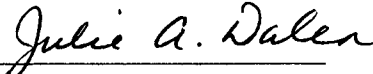
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We certify that we have served Appellants John and Julie Dalen's Second Objection to Plaintiff's Petition and Motion to Deny by depositing copies of it in the United States mail, postage pre-paid on February 5, 2018, sent to the attorneys of record to the addresses shown on page two of this document which lists other parties and counsel of record.

February 5, 2018

John D. Dalen and Julie A. Dalen  
Appearing Pro Per / Appellant(s)

  
\_\_\_\_\_  
John D. Dalen

  
\_\_\_\_\_  
Julie A. Dalen

109 Wood Valley Drive  
Westminster, SC 29693  
Ph. 864.647.4705

Other parties and counsel of record:

Attorney for Respondent Bank of America, N.A.

Brian A. Calub, Esq.  
McGuire Woods LLP  
Fifth Third Center  
201 North Tryon St., Ste. 3000  
Charlotte, NC 28202  
Ph. 704.343.2000

Attorney for Respondent FNMA

Charles S. Gwynne, Jr., Esq.  
Rogers, Townsend & Thomas, PC  
P.O. Box 100200  
Columbia, SC 29202  
Ph. 803.744.1933

B. Lindsay Crawford, III  
Theodore von Keller  
Sara C. Hutchins  
B. Lindsay Crawford, IV  
Crawford & von Keller, LLC  
PO Box 4216  
Columbia, SC 29240

*John and Julie Dalen*

---

109 Wood Valley Drive  
Westminster, SC 29693

February 5, 2018

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

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FEB 07 2018  
SC Court of Appeals

Re: Federal National Mortgage Assoc. and Bank of America, N.A., Respondents v.  
John D. Dalen, Appellant Case No. 2017-000886

Dear Ms. Kitchings:

Enclosed for filing is our Second Objection to Plaintiff's Petition and Motion to Deny which we are sending February 5, 2018 in the above-referenced case in response to plaintiff's amended certificate of service and petition. Also enclosed are seven copies, one original, and a self-addressed postage paid envelope. Please return one stamped copy. Thank you for your assistance in this matter.

Sincerely,



John D. Dalen  
109 Wood Valley Drive  
Westminster, SC 29693  
Appearing Pro Per

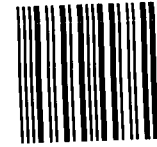
Enc:

1 2<sup>nd</sup> Objection for filing  
7 Copies (incl. one return)  
1 Envelope

John Dales  
109 Wood Valley Drive  
Westminster, SC 29693



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

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SC Court of Appeals