

**RESPONSE TO RETURN
IN OPPOSITION TO PETITION
FOR A WRIT OF MANDAMUS**

Satara Lopez and Francisco Lopez

v.

Joseph Strickland, Presiding Judge

RECEIVED

DEC 11 2018

SC Court of Appeals

IN RE:

THE STATE OF SOUTH CAROLINA
In The South Carolina Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master-In-Equity

Joseph Strickland, Presiding Judge

Civil Action No. 2015-CP-40-03832

CitiMortgage, Inc.,

Respondent,

v.

Satara Lopez and Francisco
Lopez,

Petitioners.

Appellate Case No.: 2018-00106

COMES NOW PETITIONERS Satara Lopez and Francisco Lopez responding as follows to the Respondent's Return in Opposition to Petition for Writ of Mandamus.

Respondent's position that Respondent has provided Petitioners with the court reporters' information is flawed and ignores the fact that Respondent provided this information to Petitioners almost three (3) months after Petitioners filed their Notice of Appeal. Not only did Respondent provide this information to Petitioners outside of time to order the transcript, Respondent ignores the statutory procedure requiring the presiding judge to provide this information upon request.

ISSUE

The only issue to be decided in the Petition for the Writ of Mandamus is:

Did the presiding judge err in not following his duties and responsibilities set forth in S.C. Code § 14-11-10, § 14-11-190 and § 14-15-30 in not having a court reporter present at the proceedings held in front of him and in ignoring Petitioners' repeated requests to provide the names of the court reporters to Petitioners to sustain Petitioners' appeal?

ARGUMENT

"The equity court is considered a division of the circuit court, and the master-in-equity, as judge of the equity court, is . . . subject to all the requirements of the South Carolina Bar and the rules of the Supreme Court . . ." S.C. Code § 14-11-10 (**emphasis added**)

The General Assembly of South Carolina enacted S.C. Code § 14-5-10 mandating: "The circuit courts herein established **shall be courts of record**, and the books of record thereof **shall, at all times, be subject to inspection of any person interested therein.**" (**emphasis added**)

"The master shall, upon the application of either party to any cause or proceedings in which equitable relief is demanded . . . take in writing the testimony of any witness who ay be produced before him . . ." S.C. Code § 14-11-190 (**emphasis added**)

“Every stenographer so appointed, under the direction of the presiding judge of his circuit, shall take full stenographic notes of all proceedings including the rulings and charge of the court in every trial thereat. In case the presiding judge . . . shall require a transcript of such stenographic notes the stenographer shall furnish the same written out in full.” S.C. Code § 14-15-30 (emphasis added)

The presiding judge’s duty and responsibility includes providing the record of hearings held before his court. This is a non-delegable duty as set forth by statute. Respondent’s position that they have provided the Petitioners with the court reporter information attempts to usurp and relieve the presiding judge’s statutory duties and responsibilities. Respondent takes this position, while at the same time, arguing Petitioners’ appeal should be dismissed for not following the rule of law. Respondent’s reasoning is flawed and logically inconsistent with the presiding judge’s duties and responsibilities set forth by statute.

The intent of S.C. Code § 14-15-30 in the presiding judge being responsible for providing Petitioners with the court reporters’ information is evidenced in the letter of July 30, 2018 sent to Petitioners’ counsel. Exhibit “A” attached to and fully incorporated herein, includes Exhibit D which is the July 30, 2018 letter from the South Carolina Court Administration to Petitioners’ counsel **directing Petitioners’ counsel to contact the presiding judge to obtain the court reporter information. (emphasis added)**

Exhibit “A” includes the multiple efforts by Petitioners’ counsel to obey the South Carolina Court Administration’s directive. However, the presiding judge has not responded to the multiple requests by Petitioners’ counsel.

The July 30, 2018 letter exemplifies the intent of S.C. Code § 14-15-30 and evidences the non-delegable duty and responsibility of the presiding judge. In this instance, the duty of the presiding judge to provide the court reporter information to Petitioners.

Respondent is correct in that counsel for Respondent provided the court reporter information to Petitioners. However, Respondent fails to point out that Respondent provided this information to Petitioner almost three (3) months after Petitioners filed their Notice of Appeal on June 6, 2018.

Respondent provided the court reporter information to Petitioners outside the time to order the transcript as required by Rule 207(a)(1). However, Respondent also takes the position that the Petitioners' appeal should be dismissed for, among other things, Petitioners' failure to order the transcript. This position is logically inconsistent and flawed.

Respondent takes the position that the Petitioners' appeal should be dismissed for, among other things irrelevant to the Writ of Petition, the Petitioners' failure to obtain a record of the transcript as required by Rule 207(a)(1), SCACR. Respondent takes this position while, at the same time, ignoring the statutory duties and responsibilities of the presiding judge. This logic is fundamentally flawed and logically inconsistent.

The July 30, 2018 letter from the South Carolina Court Administration to Petitioners' counsel illustrates the statutory duty of the presiding judge. That duty is to furnish the court reporters' information to Petitioners' counsel.

This failure of Judge Strickland to respond to Petitioners' requests, leaves Petitioners with no remedy to obtain the requested information. Although Respondent's position is that they have provided Petitioners' counsel with this information, Respondents are attempting to usurp the responsibilities and statutory duties of the presiding judge in having Petitioners' appeal dismissed. Petitioners have lost their home in a highly questionable foreclosure action in the underlying case. To have the Petitioners' rights to an appeal denied, would undermine the intent of the justice system and result in a highly inequitable result.

The undersigned have found no precedent, statute, or case law that authorizes Judge

Strickland to outsource his duties. Respondent has raised no reason or excuse to justify Judge Strickland's ignoring Petitioners' requests to obtain the court reporters' information, other than to admit that Respondent provided this information to Petitioners out of time to order the transcript.

It is clear that Respondent has a pecuniary interest in having the Petitioners' appeal dismissed. The award of Sixty-Three Thousand (\$63,000.00) Dollars for attorney fees to Respondent in a Foreclosure action where the disputed mortgage is One-Hundred-Twenty-Six Thousand (\$126,000.00) Dollars should be shocking to the court. The transcripts of record would expose the highly questionable injustice Petitioners have suffered in losing their home and the pecuniary interest Respondent has in having the Petitioners' appeal dismissed.

To dismiss Petitioners' appeal would allow a veto of Judge Strickland's statutory duties. This would be an incongruous result.

Petitioners agree with Respondent that "the primary purpose of a writ of mandamus is to enforce an established right and enforce a corresponding imperative duty created and or imposed by law." (See Respondent's Return in Opposition to Petition for a Writ of Mandamus, p.5) Additionally, Petitioners agree with Respondent in "Mandamus is utilized only to compel **ministerial duties** and then only if the asserted right is clear and certain." (See Respondent's Return in Opposition to Petition for a Writ of Mandamus, p.5, **Emphasis added**).

The statutes cited herein assert a right that is clear and certain, especially as it pertains to the ministerial duties and the responsibilities and duties of the presiding judge.

"A ministerial duty is defined as one which a person performs **in obedience to a mandate of legal authority without regard to or the exercise of his own judgment upon the propriety of the act to be done.**" (See Respondent's Return in Opposition to Petition for a Writ of Mandamus, p.5 and p. 6, **Emphasis added**)

The requirements in obtaining a writ of mandamus is well-settled law in South Carolina. Respondent's argue that Petitioners have not shown those requirements. However, a closer look at the requirements to obtain a writ of mandamus shows Petitioners have not only met those requirements but to deny Petitioners' writ of mandamus would result in a result not anticipated by the statutory requirements set forth herein.

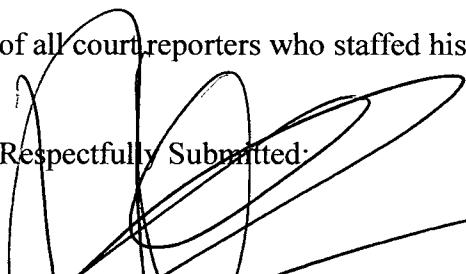
Petitioners have shown:

- 1) The presiding judge has a duty to perform the act as requested by Petitioners;
- 2) The ministerial nature of the act imposed on the presiding judge by statute;
- 3) The Petitioners' legal right for which the duty is necessary; and
- 4) The lack of any other **legal remedy (emphasis added)**.

The Respondent's providing the court reporter information is not a legal duty of Respondent and there is not a legal basis for Respondent to provide this information.

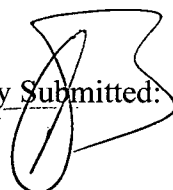
WHEREFORE, the Petitioners ask that the Motion to Dismiss the Petition for a Writ of Mandamus be denied, the Respondent's Motion to Dismiss the appeal be denied and the Writ of Mandamus be issued to Judge Strickland to perform his ministerial duties in providing the names of all court reporters who staffed his court proceedings in this case.

Respectfully Submitted:



Nathaniel Roberson, Esquire, Bar #64139
1708 Richland Street
Columbia, South Carolina 29201
(803) 252-4449
Attorney for Petitioners

Respectfully Submitted:



Charles Blackburn, Esquire, Bar #69458
1701 Cherry Laurel Drive
Columbia, South Carolina 29204
(803) 920-8726
Attorney for Petitioners

Columbia, South Carolina
December 11, 2018

EXHIBIT

"A"

STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master-In-Equity

Joseph Strickland Presiding Judge

Civil Action No. 2015-CP-40-03832

Satara Lopez and Francisco LopezAppellants

vs.

CitiMortgage, Inc....Respondent

Appellate Case No.: 2018-00106

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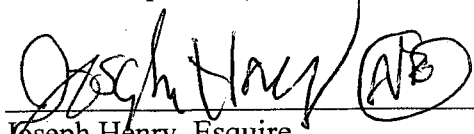
AUG 21 2018

SC Court of Appeals

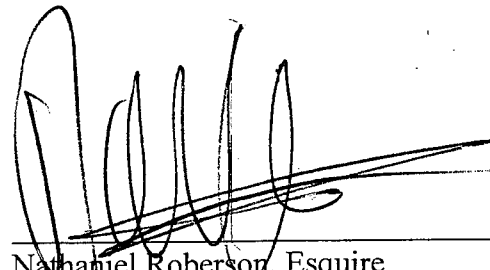
REQUEST FOR PERMISSION TO ORDER TRANSCRIPT OUT OF TIME

Now Comes Appellant in the above-referenced case who files this motion requesting permission to order transcript of record out of time. This request is being made in good faith as a result of Appellant's difficulty in ascertaining the names and contact information for the court reporters who transcribed the proceedings before the Master-in-Equity. This request is not made for the purpose of interposing delay or any other inappropriate purpose and Respondent will not suffer any prejudice by the this request.

Respectfully Submitted,



Joseph Henry, Esquire
1708-B Richland Street
Columbia, South Carolina 29201
(803) 929-3484



Nathaniel Roberson, Esquire
1708 Richland Street
Columbia, South Carolina 29201
(803) 252-4449

STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master-In-Equity

Joseph Strickland Presiding Judge

Civil Action No. 2015-CP-40-03832

Satara Lopez and Francisco LopezAppellants

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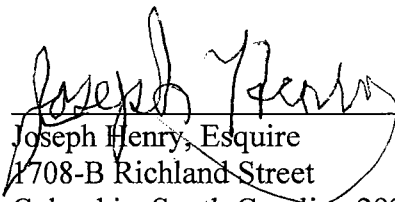
CitiMortgage, Inc....Respondent

Appellate Case No.: 2018-00106

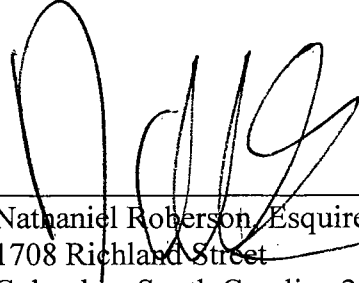
PROOF OF SERVICE

I certify that I have served a copy of the Request for Permission to Order Transcript out of Time, on Respondent CitiMortgage by serving a copy on their attorneys of record Drew Walker, Esq., 1901 Main Street, Suite 1200, Columbia, S.C. 29201, Thad H. Westbrook, Esq., and Sarah B. Nielsen, Esq., 1320 Main Street, 17th Floor, Columbia, S.C. 29201, by depositing same in the United States Mail, postage prepaid, on August 20, 2018 and addressed to their attorneys of record, Thad H. Westbrook, Esq. and Sarah B. Nielsen Esq., 1320 Main Street, 17th Floor, Columbia, S.C. 29201, Drew Walker, Esq., 1901 Main Street, Suite 1200, Columbia, S.C. 29201.

RECEIVED
AUG 21 2018
SC Court of Appeals



Joseph Henry, Esquire
1708-B Richland Street
Columbia, South Carolina 29201
(803) 929-3484



Nathaniel Roberson, Esquire
1708 Richland Street
Columbia, South Carolina 29201
(803) 252-4449



Nathaniel Roberson

Attorney at Law
1708 Richland St.
Columbia, S.C. 29201
Cell: (803) 920-2104

Office: (803) 252-4449
E-Mail: RobersonLawFirm@sc.rr.com

Fax: (803) 252-6266

August 20, 2018

ORDERING TRANSCRIPT OF HEARING IN THE WITHIN CASE

TO: Ms. V. Claire Allen, Deputy Clerk of Court

SUBJECT: Efforts to Request Transcript of Hearing

RE: Motion to Request Transcript Out of Time

RECEIVED

AUG 21 2018

SC Court of Appeals

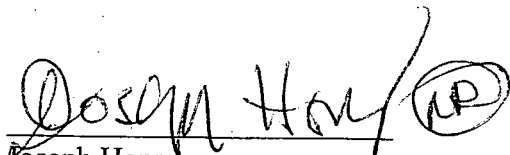
Dear Ms. Allen:

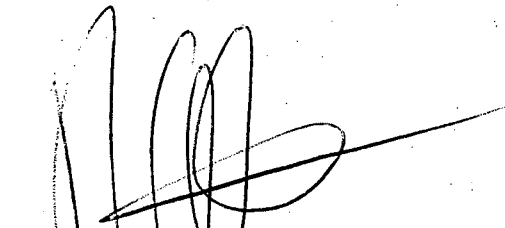
Along with the Request for Permission to Order Transcript Out of Time, please find attached thereto the efforts we have made to secure the names of the Court Reporters on the dates to which they were assigned to Judge Joseph Strickland.

We will request the transcripts immediately upon receiving the information from Judge Strickland.

With kindest regards, I am.

Very truly yours,


Joseph Henry
Attorney at Law


Nathaniel Roberson
Attorney at Law



Nathaniel Roberson

Attorney at Law
1708 Richland St.
Columbia, S.C. 29201
Cell: (803) 920-2104

Office: (803) 252-4449
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Fax: (803) 252-6266

August 20, 2018

HAND DELIVERED

The Honorable Joseph M. Strickland
P.O. Box 192
Columbia, S.C. 29202

RE: *CitiMortgage v. Satara Lopez and Francisco Lopez, et al*
C/A No.: 2015-CP-40-03832

Appellate Case No.: 2018-00106

Dear Judge Strickland:

The above-referenced case was appealed to the South Carolina Court of Appeals and we are in need of the names and addresses of the Court Reporters who staffed the proceedings on the dates listed below (this list may not be complete):

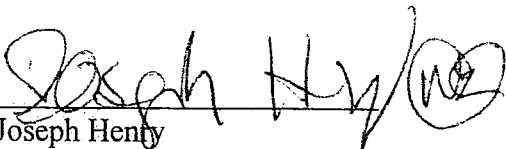
October 26, 2015 - Roster Meeting
March 14, 2016 - Roster Meeting
May 16, 2016 - Motion Hearing
May 23, 2016 - Roster Meeting
June 28, 2016 - Motion hearing
July 11, 2016 - Roster Meeting
September 19, 2016 - Roster Meeting
October 3, 2016 - Status Conference
November 10, 2016 - Status Conference
April 19, 2017 - Hearing before the Master-In-Equity
June 29, 2017 - Status Conference
May 4, 2018 - Show Cause Hearing

Please supply us with this information as soon as possible.

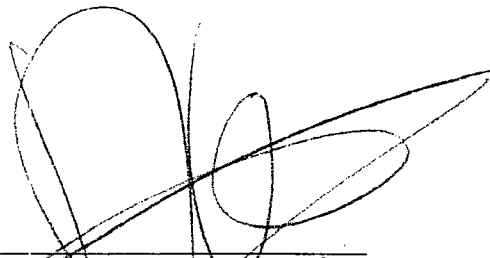
Thank you for your cooperation in this matter.

With kindest regards, I am.

Very truly yours,



Joseph Henry
Attorney at Law



Nathaniel Roberson
Attorney at Law



EXHIBIT

"A"



Nathaniel Roberson

Attorney At Law
1708 Richland St.
Columbia, S.C. 29201

Phone: (803) 252-4449

Home: (803) 865-0163

Fax (803) 252-6266

Email: RobersonLawFirm@sc.rr.com

July 2, 2018

HAND DELIVERED

The South Carolina Court of Appeals
ATTN: Ms. V. Claire Allen, Deputy Clerk of Court
1220 Senate Street
P.O.Box 11629
Columbia, SC 29201

RECEIVED
JUL 02 2018
SC Court of Appeals

RE: *Satara Lopez v. Citi Mortgage*
Appellate Case No.: 2018-00106

Dear Ms. Allen:

This letter is in response to your letter to us dated June 27, 2018 with reference to the Order of Transcripts in the above-captioned case.

Also be advised that during the entire proceeding before Judge Strickland, we continually complained about not having a Court Reporter to take the testimony and arguments of the court proceedings. Our objections to the lack of having a Court Reporter went unanswered. Also there may have been a Court Reporter at a very limited number of the proceedings.

Because of the conduct of the Master-In-Equity, we are unable to request the Transcript, if any exist, of the proceedings.

We are, by way of this correspondence, requesting that Judge Strickland supply us with names and addresses of the Courts Reporters who attended the limited number of the proceedings when one was present.

It should be noted that Judge Strickland informed us that he does not have a regular Court Reporter.

We were also informed by Judge Strickland that he is a Circuit Court judge under an order from Judge Ernest Finney, along with the Master-In-Equity for Richland County.

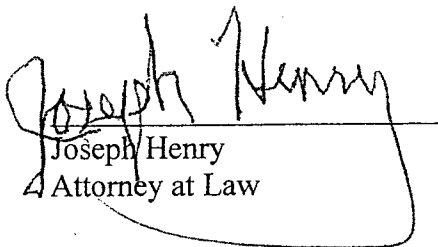
We are at a loss to determine how to get the names of any Court Reporters and in those instances where there is no record of the proceedings being recorded, how do we rectify this situation? (*see*

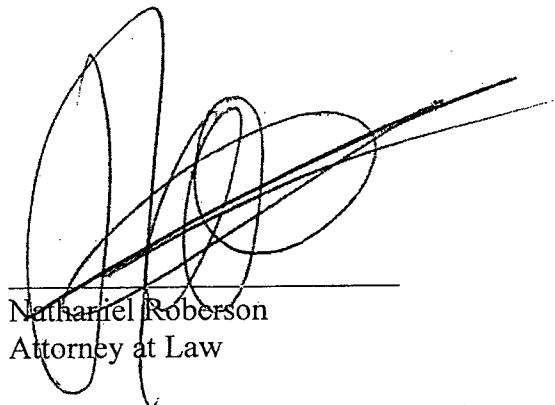
letter to Judge Strickland requesting the names of Court Reporters in the proceedings in this case)

We will await any directions from the court.

With kindest regards, I am.

Very truly yours,


Joseph Henry
Attorney at Law


Nathaniel Roberson
Attorney at Law

Enclosure



Nathaniel Roberson

Attorney At Law
1708 Richland St.
Columbia, S.C. 29201

Office: (803) 252-4449
E-Mail: RobersonLawFirm@sc.rr.com

Home: (803) 865-0163

Fax (803) 252-6266

July 2, 2018

HAND DELIVERED

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JUL 02 2018

SC Court of Appeals

The Honorable Joseph Strickland
Richland County Master in Equity
P.O. Box 192
Columbia, S.C. 29202

RE: *CitiMortgage, Inc. v. John F. Mitchem, III, et al.*
C/A No.: 2015-CP-40-03832

Dear Judge Strickland:

As you already know, we have appealed the above-captioned case.

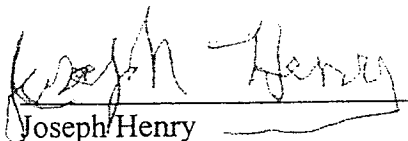
Also, we must request a Transcript of the proceedings held before you until the Final Judgment.

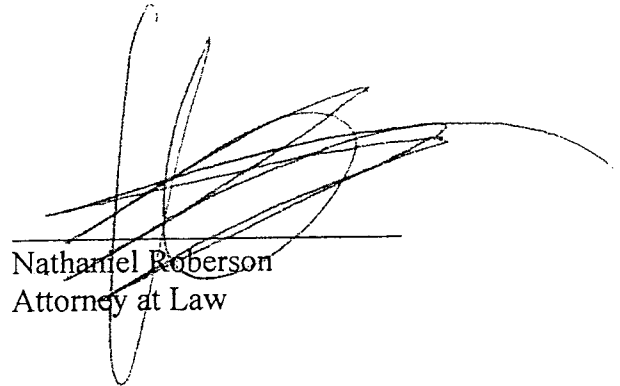
Our letter is to request that you supply us with the names of the Court Reporter(s) who staffed the proceedings held before you.

We look forward to hearing from you.

With kindest regards, I am.

Very truly yours,


Joseph Henry
Attorney at Law


Nathaniel Roberson
Attorney at Law

cc: *Via E-mail*
Thad Westbrook (thad.westbrook@nelsonmullins.com)
Drew B. Walker (dwalker@rogerslewis.com)



EXHIBIT

"B"



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

July 12, 2018

Mr. Joseph Henry, Esquire
1708 B Richland St.
Columbia SC 29201

Mr. Nathaniel Roberson, Esquire
1708 Richland St.
Columbia SC 29201

Re: Satara Lopez v. CitiMortgage
Appellate Case No. 2018-001061

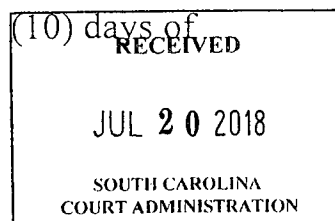
Dear Counsel:

We received your letter dated July 2, 2018 in regards to contacting the court reporter to order the transcript. You must contact the office of Court Administration for any information regarding the court reporter. The address for Court Administration is as follows:

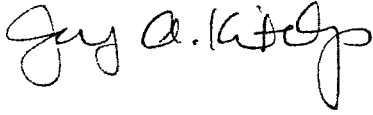
South Carolina Office of Court Administration
1220 Senate Street, Suite 201
Columbia, SC 29201

Be sure to copy the Court and opposing counsel with all correspondence concerning the transcript.

Please advise the Court of the status of the transcript within ten (10) days of the date of this letter, or your appeal may be dismissed.



Very truly yours,



CLERK

brook, Esquire
Walker, Esquire

RECEIVED
JUL 20 2018
SOUTH CAROLINA
COURT ADMINISTRATION



EXHIBIT

"C"



Nathaniel Roberson

Attorney At Law
1708 Richland St.
Columbia, S.C. 29201

Office: (803) 252-4449

Home: (803) 865-0163

Fax (803) 252-6266

E-Mail: RobersonLawFirm@sc.rr.com

July 19, 2018

HAND DELIVERED

South Carolina Office of Court Administration
Court Reporter Division
1220 Senate Street, Suite 200
Columbia, S.C. 29201

The South Carolina Court of Appeals
ATTN: Ms. V. Claire Allen, Deputy Clerk of Court
1220 Senate Street
P.O.Box 11629
Columbia, SC 29201

RECEIVED

JUL 20 2018

SC Court of Appeals

RE: *Satara Lopez v. Citi Mortgage*
Appellate Case No.: 2018-00106

Richland County Common Pleas Case No:
C/A No.: 2015-CP-40-03832

To Whom It May Concern:

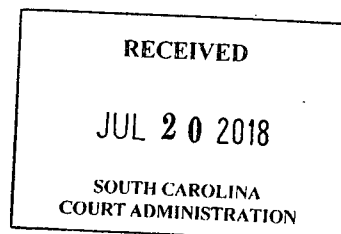
The above-cited case originated in the Richland County Court of Common Pleas.

It was transferred from Common Pleas Court to the Master-In-Equity for Richland County, which is presided over by the Honorable Joseph F. Strickland.

The Final Judgment in the case was made by Judge Strickland and the matter was appealed to the South Carolina Court of Appeals.

We are in need of the names and addresses of the Court Reporters who were assigned to Judge Strickland on the dates listed below or during the week of the dates enumerated so we can request the transcripts of the hearings to wit:

October 26, 2015 - Roster Meeting
March 14, 2016 - Roster Meeting
May 16, 2016 - Motion Hearing

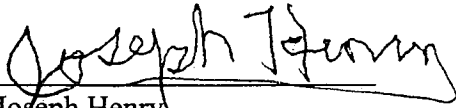


May 23, 2016 - Roster Meeting
June 28, 2016 - Motion hearing
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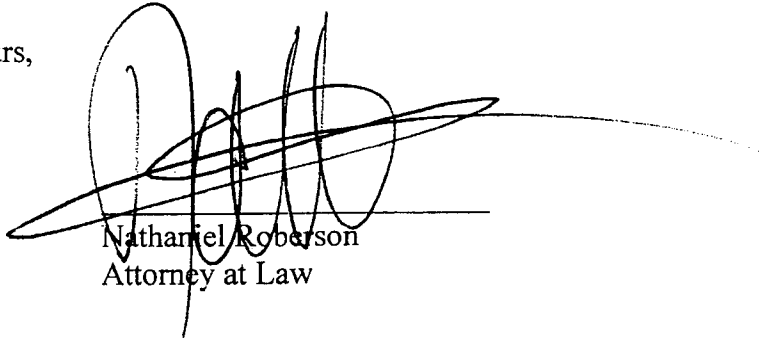
Thank you in advance for your cooperation in this matter.

With kindest regards, I am.

Very truly yours,

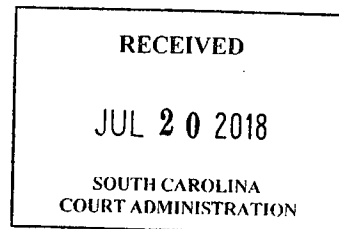


Joseph Henry
Attorney at Law



Nathaniel Roberson
Attorney at Law

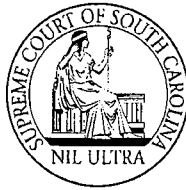
cc: Thad H Westbrook, Esquire
Andrew Bryant Walker, Esquire





EXHIBIT

"D"



South Carolina Court Administration

South Carolina Supreme Court
Columbia, South Carolina

TONNYA K. KOHN
INTERIM DIRECTOR

KARAMA T. BAILEY
DEPUTY DIRECTOR

1220 SENATE STREET, SUITE 200
COLUMBIA, SOUTH CAROLINA
29201

July 30, 2018

Nathaniel Roberson
Attorney at Law
1708 Richland St.
Columbia, SC 29201

Dear Mr. Roberson:

I am responding to your letter received on July 20, 2018. In your letter you are requesting transcripts from hearings held before the Honorable Joseph F. Strickland, Master-In-Equity. This is to advise that you must contact that office directly to determine how you may obtain a transcript from that proceeding. I have provided the address below:

The Honorable Joseph M. Strickland
PO Box 192
Columbia, SC 29202-0192

If you have further questions regarding court reporters and/or transcripts from Circuit or Family Court, please do not hesitate to contact this office again.

Respectfully,


Desiree Allen
Court Reporter Manager



Nathaniel Roberson

Attorney At Law
1708 Richland St.
Columbia, S.C. 29201

Office: (803) 252-4449
E-Mail: RobersonLawFirm@sc.rr.com

Home: (803) 865-0163

Fax (803) 252-6266

July 19, 2018

HAND DELIVERED

South Carolina Office of Court Administration
Court Reporter Division
1220 Senate Street, Suite 200
Columbia, S.C. 29201

The South Carolina Court of Appeals
ATTN: Ms. V. Claire Allen, Deputy Clerk of Court
1220 Senate Street
P.O.Box 11629
Columbia, SC 29201

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Appellate Case No.: 2018-00106

Richland County Common Pleas Case No:
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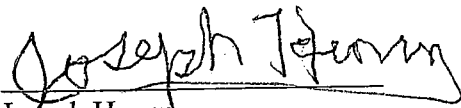
SOUTH CAROLINA
COURT ADMINISTRATION

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July 11, 2016 - Roster Meeting
September 19, 2016 - Roster Meeting
October 3, 2016 - Status Conference
November 10, 2016 - Status Conference
April 19, 2017 - Hearing before the Master-In-Equity
June 29, 2017 - Status Conference
May 4, 2018 - Show Cause Hearing

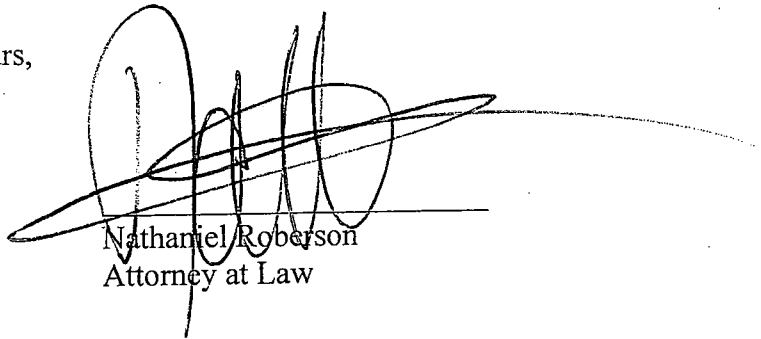
Thank you in advance for your cooperation in this matter.

With kindest regards, I am.

Very truly yours,

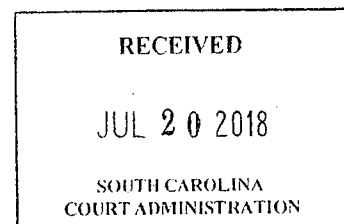


Joseph Henry
Attorney at Law



Nathaniel Roberson
Attorney at Law

cc: Thad H Westbrook, Esquire
Andrew Bryant Walker, Esquire



EXHIBIT

"E"



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
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August 13, 2018

Mr. Joseph Henry, Esquire
1708 B. Richland St.
Columbia SC 29201

Mr. Nathaniel Roberson, Esquire
1708 Richland St.
Columbia SC 29201

Re: Satara Lopez v. CitiMortgage
Appellate Case No. 2018-001061

Dear Counsel:

Our records reflect that the time for ordering the transcript has expired. Within ten days of the date of this letter, you must file a copy of the letter showing that you have ordered the transcript directly from the court reporter, along with a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules. Your appeal will be dismissed if no motion is made within ten days of the date of this letter.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Thad H. Westbrook, Esquire
Andrew Bryant Walker, Esquire

STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

RECEIVED
DEC 11 2018
SC Court of Appeals

Satara Lopez and Francisco

v.

Joseph Strickland, Presiding Judge

IN RE:

THE STATE OF SOUTH CAROLINA
In The South Carolina Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master-In-Equity

Joseph Strickland, Presiding Judge

Civil Action No. 2015-CP-40-03832

CERTIFICATE OF SERVICE

CitiMortgage, Inc.,

Respondent,

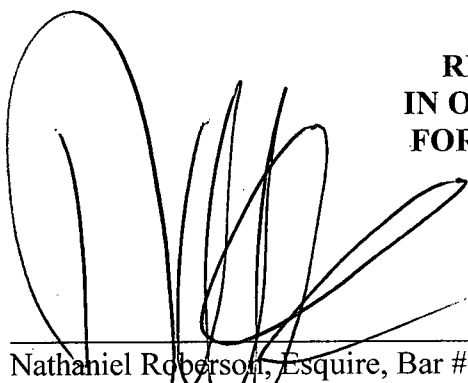
v.

Satara Lopez and Francisco
Lopez,

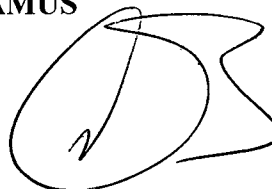
Petitioners

Appellate Case No.: 2018-00106

**RESPONSE TO RETURN
IN OPPOSITION TO PETITION
FOR A WRIT OF MANDAMUS**



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1708 Richland Street
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Attorneys for Appellants, Satara Lopez and
Francisco Lopez
Other Counsel of Record:

Attorneys for Respondent:

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Nelson Mullins Riley & Scarborough, LLP
1320 Main St., 17th Floor
Columbia, South Carolina 29201

The Honorable Joseph M. Strickland
Richland County Master-in-Equity
P.O. Box 192
Columbia, S.C. 29202