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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell Scarborough  
Master-in-Equity

RECEIVED  
OCT 30 2019  
SC Court of Appeals

Appellate Case No. 2019-000575

Ditech Financial, LLC.....Respondent,

v.

Kevin G. Snyder, individually and  
as Personal Representative of the  
Estate of Mary Snyder ..... Appellant.

PETITION FOR A WRIT OF SUPERSEDEAS

Appellant Kevin G. Snyder submits this Petition for Supersedeas, pursuant to Rule 241, SCACR, requesting a writ of supersedeas to suspend proceedings in the lower court. Snyder would show this Court the following<sup>1</sup> in support of his petition:

<sup>1</sup> Also attached, pursuant to Rule 241(d)(4)(C), SCACR, are certified copies of:

09/27/19 Order denying supersedeas (Exhibit A)

10/18/19 Order denying supersedeas (Exhibit B)

Snyder's motion for supersedeas before the Master-in-Equity is located in the Record on Appeal (R. pp. 435-440), as is Ditech's response (R. pp. 554-560). The Record on Appeal and final briefs were filed of record with this Court on October 18, 2019.

## BACKGROUND

This is the appeal of a contested residential foreclosure. The Respondent is the purported successor to the original Plaintiff, BAC Home Loans Servicing, LP f/k/a Countrywide Home Loans Servicing, LP. The Appellant is Kevin Snyder, in his individual capacity as a mortgagor of the property, and as personal representative of his late wife, who was also a mortgagor.<sup>2</sup> BAC filed the original foreclosure Complaint and Lis Pendens on September 23, 2010, and amended the Complaint and Lis Pendens on October 13, 2010. (R. pp. 35-39, 42, 45-49, 56-57). Kevin and Mary Snyder were served a Notice Foreclosure Intervention on December 17, 2012, which was denied. (R. pp. 59-60, 63). Undersigned counsel appeared for the Snyders on May 3, 2013, filing his notice of appearance with the Clerk of Court and serving it on BAC's counsel. (R. p. 66). BAC purportedly transferred the Snyders' loan at some point shortly thereafter to Green Tree Servicing, LLC,<sup>3</sup> and on June 17, 2013, the Snyders' counsel sent Green Tree a letter informing it of the Snyders' representation, and enclosing a copy of In re Mortgage Foreclosure Actions, 396 S.C. 209, 720 S.E.2d 908 (2011) (the "Admin Order"). (R. p. 121). The Snyders' counsel followed up this letter with another letter on July 18, 2013, that enclosed a written authorization from the Snyders (requested by Green Tree) and another copy of the Admin Order. (R. pp. 144-45). BAC's attorney was copied on this letter. (R. p. 144). These opening communications inaugurated Green Tree's nearly six year period of bungled communications and foreclosure interventions, presented in detail in Argument I of Snyder's Principal Brief.

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<sup>2</sup> During the pendency of this action, Snyder's profoundly disabled daughter died (December 22, 2014), and almost a year later his wife, former Defendant Mary Snyder, died of undiagnosed lung cancer (November 23, 2015).

<sup>3</sup> However, please see Argument III of Snyder's Principal Brief, which argues that BAC (and ultimately Ditech) did not have the standing to pursue this action.

Pursuant to a September 30, 2013, status hearing, this action was stayed pending foreclosure intervention. The Snyders' counsel was not provided notice of this hearing or order. (R. p. 4). On March 12, 2014, the Master-in-Equity, without notice or hearing, granted BAC's motion to replace BAC Home Loans Servicing, LP with Green Tree Servicing, LLC as Plaintiff. (R. pp. 9-10, 179-87).

Green Tree substituted counsel on April 9, 2015, and again on July 2, 2018. The parties engaged in discovery, and Snyder filed a motion to compel on November 29, 2018 to compel Green Tree's responses to his discovery. (R. pp. 88-90, 179-87). Pursuant to a December 10, 2018, status conference (where the motion to compel was heard without a court reporter), the Master-in-Equity issued a consent scheduling order and a consent order amending the caption to replace Green Tree Servicing, LLC with Ditech Financial, LLC. (R. pp. 13-16).

Ditech filed notice of its bankruptcy on March 1, 2019 (amended May 1, 2019). (R. pp. 199-288). All parties filed motions for summary judgment on March 11, 2019. (R. pp. 291-433). These motions were heard at a pre-trial hearing on March 18, 2019. (R. pp. 561-601). The Master-in-Equity denied Snyder's motion, granted Ditech's motion in part, and denied Snyder's motion to compel by order dated March 27, 2019. (R. pp. 19-22). Snyder timely appealed this order on March 29, 2019. (R. pp. 531-33). Though Snyder argued that the Master-in-Equity lacked jurisdiction due to the appeal (R. pp. 606-22), the Master-in-Equity proceeded with a final hearing on April 1, 2019. (R. pp. 622-60). The Master-in-Equity issued his final order on April 23, 2019, ordering the foreclosure of the mortgage and the sale of 1752 Orange Grove Shores. (R. pp. 23-32). Snyder amended his notice of

appeal to include this order and also filed a motion for supersedeas on May 2, 2019. (R. pp. 436-40). Ditech filed its response to the motion on June 3, 2019. (R. pp. 554-560).

The Clerk of Court scheduled the supersedeas motion to be heard before Judge Deadra Jefferson on September 27, 2019; at hearing, Judge Jefferson denied the motion for being filed with the “wrong Court”.<sup>4</sup> (Exhibit A). The Master-in-Equity subsequently heard the motion without hearing, with the consent of the parties, and granted the motion on October 18, 2019, setting the supersedeas bond at \$25,000.00. (Exhibit B).

### ARGUMENT

A writ of supersedeas must be issued if “such an order is necessary to preserve jurisdiction of the appeal or to prevent a contested issue from becoming moot.” Rule 241(c)(2), SCACR. The parties agree that such a writ is proper under the circumstances of this case, as the judicial sale of Snyder’s property would moot some or all of the issues of this appeal. Snyder takes issue with the amount of the bond, which he believes should be nominal. While the amount of an appeal bond is committed to the sound discretion of the court below, United Dominion Realty Trust, Inc. v. Wal-Mart Stores, Inc., 307 S.C. 102, 413 S.E.2d 866 (Ct. App. 1992), the appellate court has the authority to reduce the amount of a bond. See e.g. Bunkum v. Manor Props., 321 S.C. 95, 467 S.E.2d 758 (Ct. App. 1996) (Supreme Court reduced the amount of appeal bond upon a petition for supersedeas).

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<sup>4</sup> This is incorrect. Snyder’s counsel properly filed the motion with the Charleston County Clerk of Court, as he has done for his entire fourteen years of practice; the Master-in-Equity’s office does not accept written motions for filing. After the September 27, 2019 hearing the parties’ counsel provided written copies of the motion and response to the Master-in-Equity’s office, who agreed to consider the motion without re-filing and without a hearing.

In its response before the Master-in-Equity, Ditech requested a bond of \$25,134.48, which represented the monthly mortgage payment of \$1,396.36 multiplied by eighteen months; this bond would increase if the appeal lasted longer than eighteen months. (R. pp. 557-58). A supersedeas or appeal bond is intended to indemnify the respondent for the value of the judgment if it is affirmed. See generally Jerome v. McCarter, 88 U.S. (21 Wall) 17, 30 (1874); Catlett v. Brodie, 22 U.S. 553, 554 (1824). Ditech has waived its right to pursue a deficiency judgment in this matter, limiting its recovery on its \$249,883.00 judgment to the assets obtained from the sale of the residence at 1752 Orange Grove Shores. (R. pp. 27-28, 659). This property is worth perhaps \$249,883.00. (R. p. 248). Ditech holds a judgment for \$293,930.69. (R. p. 28). As Ditech has voluntarily limited its harm to the value of the property at issue in this action (which will never conceivably satisfy or exceed Ditech's judgment), it cannot be harmed by this appeal, and bond is not necessary. Cf. Urbain v. Knapp Bros. Mfg. Co., 217 F.2d 810, 815-16 (7th Cir. 1954) (no security necessary for a preliminary injunction when no material harm can come to the party restrained).

A bond is also not necessary because the Master-in-Equity lost jurisdiction over this matter on March 29, 2019, when Snyder appealed the Master-in-Equity's March 27, 2019, order granting, in part, Ditech's motion for summary judgment. (R. pp. 19-22, 531-33). Assuming, *arguendo*, the March 27, 2019, order was not final,<sup>5</sup> it nonetheless affects

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<sup>5</sup> In the alternative, Snyder would submit that the March 27, 2019, order was a "final" order under South Carolina law. South Carolina law defines a final judgment/order as: "one which operates to divest some right in such a manner as to put it beyond the power of the Court making the order to place the parties in their original condition after the expiration of the term". Good v. Hartford Accident & Indem. Co., 201 S.C. 32, 21 S.E. 2d 209 (1942); S.C. Code § 14-3-330(3) (final orders appealable). If the March 27, 2019 order is treated as interlocutory, this Court will not be able to place the parties in their original condition

a substantial right, as it effectively strikes Snyder's cause of action for civil compensatory contempt, and strikes the Estate of Mary Snyder's defense of the Attorney Preference Statute. See S.C. Code § 14-3-330(2) (interlocutory order affecting a substantial right immediately appealable). Snyder was unable to fully contest Ditech's case at the final hearing; a substantial right was affected. See McLaughlin v. Strickland, 279 S.C. 513, 309 S.E.2d 787 (Ct. App. 1983); see also Breland v. Love Chevrolet Olds, Inc., 339 S.C. 89, 529 S.E.2d 11 (2000) (immediate appeals under section 14-3-330(2) have been allowed in situations where the substantial right could not be vindicated on appeal after the case). Ditech appears to agree with Snyder's position: "**Respondent does not dispute the immediate appealability of the portion of the Court's March 27, 2019 Order granting Ditech partial summary judgment and striking Appellant's defense...**" (R. p. 549) (emphasis added).

As the March 27, 2019, order was immediately appealable (even in part), the effect of the March 29, 2019, notice of appeal was to divest the Master-in-Equity of jurisdiction.

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after trial. The April 23, 2019, final order in this matter directs the sale of the property in question. (03/23/19 order p. 6). Orders directing the sale of property are not subject to the automatic stay of an appeal. Rule 241(b)(4), SCACR. Should Snyder prevail on his appeal of the March 27, 2019, order, the Master-in-Equity's order of foreclosure and sale would be reversed. However, by this time this Court issues an opinion, the property in question will have been sold via judicial sale. Without an immediate appeal of the March 27, 2019 order, and the consequential automatic stay, the property at issue could be lost and an appeal would not reinstate ownership.

The immediate appealability of the March 27, 2019, order is consistent with other South Carolina decisions, which generally hold that an order that affects an interest in property is immediately appealable, especially if there exists a risk that the underlying property could be lost. See Lebovitz v. Mudd, 289 S.C. 476, 347 S.E.2d 94 (1986) (order dissolving lis pendens immediately appealable); Va.-Carolina Chem. Co. v. Wilkins, 105 S.C. 291, 298, 89 S.E. 659, 661 (1916) (order dissolving an attachment to lumber immediately appealable); Kay v. Meadors, 216 S.C. 483, 486, 58 S.E.2d 893, 895 (1950) (order refusing to dissolve an attachment to automobile immediately appealable).

“As a general rule, the service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order, judgment, decree or decision on appeal, and to automatically stay the relief ordered in the appealed order, judgment, or decree or decision.” Rule 241(a), SCACR. Upon the service of the Notice of Appeal, Rule 205, SCACR, divests the lower court of jurisdiction in matters “affected by the appeal”. Stokes-Craven Holding Corp. v. Robinson, 416 S.C. 517, 534, 787 S.E.2d 485, 494 (2016). According to the South Carolina Supreme Court, to “affect” a matter is “to produce an effect on; to influence in some way”. Id. (quoting Black’s Law Dictionary 68 (10th ed. 2014)). This is a broad definition – the Stokes-Craven court held that even issues in other cases may be stayed if the issues in those cases depend in some way on the case appealed.

Id.

Snyder requested the following relief<sup>6</sup> in his civil compensatory contempt cause of action:

...Defendants request that this Court strike Plaintiff’s Amended Complaint and Plaintiff’s Reply to Defendant’s counterclaims. Defendants would further request that this Court enter default against the Plaintiff and issue a default judgment on Defendants’ counterclaims for civil compensatory contempt and quiet title ordering either (1) dissolution of Plaintiff’s lien on 1752 Orange Grove Shores Drive or (2) rescission of the note and mortgage at issue in this action.

In the alternative, Defendants would ask that Plaintiff’s demand for damages of accrued interest, fees (including attorneys’ fees), costs, advances, and a deficiency judgment be struck from Plaintiff’s Amended Complaint and it be barred from offering any evidence of the same.

(R. p. 419). This cause of action was effectively struck by the Master-in-Equity’s March 27, 2019 order (“Plaintiff’s Motion for Summary Judgment is GRANTED as to the non-

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<sup>6</sup> While this language is from Snyder’s motion for summary judgment (which was denied), it shows the scope of relief possible under the current orders from the bankruptcy court.

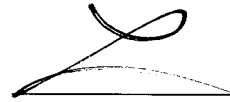
stayed portions of Defendants' counterclaim for Civil Compensatory Contempt"). (R. p. 22). Should Snyder prevail on appeal and obtain this requested relief, Ditech will have had no right to proceed with its foreclosure action and Snyder's property would no longer be encumbered by the mortgage at issue. Should Snyder prevail on appeal and obtain his alternative relief, Ditech would not be able to claim a significant amount of damages (in excess of \$150,000.00). Either circumstance "produce[s] an effect on" or "influence[s]" the underlying action; therefore, this action should have been stayed in its entirety on March 29, 2019. Likewise, the striking of the Attorney Preference Statute defense (R. p. 22) has a direct effect on the foreclosure action, as if the Estate of Mary Snyder were to prevail on this defense, it would be entitled to a setoff. See Deutsche Bank Nat. Trust Co. v. Booms, Op. No. 2015-UP-097 (S.C. Ct. App. Feb. 25, 2015) (citing S.C. Code § 37-10-105(A)).

The Master-in-Equity's March 27, 2019, order granting summary judgment does not fall within any of the recognized exceptions in Rule 241(b), SCACR. Therefore, the March 27, 2019, order falls under the "general rule" of Rule 241(a), where "the service of a notice of appeal in a civil matter acts to automatically stay matters decided in the order, judgment, decree or decision on appeal". The action below should have been stayed without bond on March 29, 2019; accordingly, any supersedeas issued by this Court should likewise be issued without bond (or alternatively, a nominal bond).

**CONCLUSION**

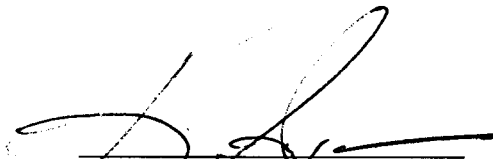
The petition for supersedeas should be granted and bond be waived or set at a nominal amount (e.g. \$100.00).


Dated: 10/28/2019

  
\_\_\_\_\_  
Jason Scott Luck  
jluck@garrettlawsc.com  
Garrett Law Offices, LLC  
1075 E. Montague Ave.  
North Charleston, SC 29405  
843.554.5515 (phone)  
843.747.3198 (telefax)  
Attorney for Appellant

**VERIFICATION**

Personally appeared before me, Kevin G. Snyder, who being duly sworn does state as follows: I am the Appellant in this case, I have read the Petition for a Writ of Supersedeas and can and do verify under oath that to the best of my knowledge, the facts stated therein are true.

  
\_\_\_\_\_  
Kevin G. Snyder

**SWORN TO AND SUBSCRIBED BEFORE ME**  
this 28<sup>th</sup> Day of October, 2019  
 (SEAL)  
NOTARY PUBLIC FOR SOUTH CAROLINA  
My Commission Expires: 10/25/2020



**FORM 4**

**STATE OF SOUTH CAROLINA**  
COUNTY OF CHARLESTON  
IN THE COURT OF COMMON PLEAS

**JUDGMENT IN A CIVIL CASE**

CASE NO.: **2010-CP-10-07838**

Ditech Financial, LLC,

v.

Kevin G. Snyder, et al.,

PLAINTIFF

DEFENDANT

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.
- 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
- 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.

FILED  
2019 SEP 30 PM 3:00  
JULIE J. ARMSTRONG  
CLERK OF COURT

**IT IS ORDERED AND ADJUDGED:**  See attached order. (Formal order to follow)  
 Statement of Judgment by the Court:

This case came before the Court on September 27, 2019 for a hearing on Defendant's Motion for Supersedeas, filed May 2, 2019. At the call of the case, Jason S. Luck, Esq. withdrew the Motion, as Mr. Luck filed this Motion with the wrong Court. This case was referred to the Master in Equity on December 16, 2010 by the Clerk of Court. Accordingly, the Master in Equity has continuing exclusive jurisdiction over this case, as the case has not been remanded back to the Circuit Court. Mr. Luck advised the Court that he will file this Motion with the Master in Equity.

**ORDER INFORMATION**

This order  ends  does not end the case.

Additional Information for the Clerk : \_\_\_\_\_

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.**

  
Circuit Court Judge

2128  
Judge Code

9/27/2019  
Date

**For Clerk of Court Office Use Only**

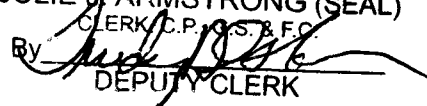
This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ to attorneys of record or to parties (when appearing pro se) as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
ATTORNEY FOR PLAINTIFF

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
ATTORNEY FOR DEFENDANT

\_\_\_\_\_  
CLERK OF COURT

**Court Reporter:**

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
CLERK, C.P., S.S. & F.C.  
By   
DEPUTY CLERK

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2010 CP-10-7838

Ditech Financial, LLC

Kevin G. Snyder, individually and as

PLAINTIFF(S)

Personal Representative of the Estate of Mary Snyder

DEFENDANT(S)

Submitted by: Master in Equity

Attorney for :  Plaintiff  Defendant  
or  
 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
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other

FILED  
CLERK OF COURT  
OCT 18 PM 4:17

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: Defendant Snyder has filed a Motion for Supersedeas and, in order to stay the sale of the property, is required to post a bond pursuant to statute, S.C. Code 18-9-170. The parties have requested the Court set a bond without a hearing. The Court hereby sets the bond in the amount of \$25,000.00 to be posted with the Charleston County Clerk of Court to stay the sale pending the appellate process.

ORDER INFORMATION

This order  ends  does not end the case.

Additional Information for the Clerk :

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.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Master In Equity

3062

Judge Code

10/16/19

Date

ATTEST: A TRUE COPY  
JULIE J. ARMSTRONG (SEAL)  
CLERK, C.P. & C.E.C.  
BY   
DEPUTY CLERK

EXHIBIT  
8

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell Scarborough  
Master-in-Equity

Appellate Case No. 2019-000575

RECEIVED  
OCT 30 2019  
SC Court of Appeals

Ditech Financial, LLC.....Respondent,

v.

Kevin G. Snyder, individually and  
as Personal Representative of the  
Estate of Mary Snyder ..... Appellant.

CERTIFICATE OF SERVICE

I certify that I have served the Petition for a Writ of Supersedeas on the person(s) set forth below by depositing a copy of them in the United States Mail, postage prepaid, on the date set forth below:

Jonathan E. Schulz  
Bradley Arant Boult Cummings, L.P.  
214 N. Tryon St., Ste. 3700  
Charlotte, NC 28202  
Attorneys for Respondent

Jenny Abbot Kitchings  
Clerk of Court  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Dated: 10/29/19

Jason Scott Luck  
jluck@garrettlawsc.com  
Garrett Law Offices, LLC  
1075 E. Montague Ave.  
North Charleston, SC 29405  
843.554.5515 (phone)  
843.747.3198 (telefax)  
Attorney for Appellant

# Garrett Law Offices

Ltd. Co.

Gordon H. Garrett (Ret.)  
Gordon H. Garrett  
Jason Scott Luck  
Ryan A. Love

1075 East Montague Avenue  
North Charleston, SC 29405  
843.554.5515 (O) 843.747.3198 (F)  
office@garrettlawsc.com

29 October 2019

Jenny Abbot Kitchings  
Clerk of Court  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
OCT 30 2019  
SC Court of Appeals

Re: *Ditech Financial, LLC v. Snyder*, 2019-000575  
Appellate Case No.: 2019-000575

Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of Plaintiff's Petition for Writ of Supersedeas in the above-captioned appeal as well as check number 1597 in the amount of \$50.

Please do not hesitate to contact me with any questions.

With Highest Regards,



Antonia Francis  
Law Clerk

/ayf  
Enclosures

cc: Jonathan Schulz, Attorney for Respondents (via U.S. Mail) (w/enc)

Garrett Law Offices, LLC  
1075-A East Montague Avenue  
North Charleston, South Carolina 29405



Jenny Abbot Kitchings  
Clerk of Court  
S. C. Court of Appeals  
PO Box 11629  
Columbia, SC 29211