

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Court of Appeals No. 2019-000486

Florence Common Pleas No. 2018-CP-21-03238

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SC Court of Appeals

Nationstar Mortgage LLC..... Plaintiff,

v.

Barbara A. Gibbs, Melvin E. Gibbs, and
Westbrook Phase IV Homeowners Association Defendants,

Of whom Barbara A. Gibbs and Melvin E. Gibbs are the Appellants,

v.

Nationstar Mortgage LLC..... Respondent.

**OBJECTION TO APPELLANTS' MOTION
FOR SUMMARY REVERSAL AND SANCTIONS**

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SC Bar No: 72009
MCGUIREWOODS LLP
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*Attorney for Respondent Nationstar
Mortgage LLC*

Respondent Nationstar Mortgage LLC (“Nationstar”), by undersigned counsel, hereby respectfully prays that the Court deny Appellants’ Motion for Summary Reversal and Sanctions (“Appellants’ Motion”). The grounds for denial of Appellants’ Motion are more fully articulated in the Motion to Dismiss Appeal that Nationstar served on February 12, 2020, and the background and arguments presented in Nationstar’s Motion to Dismiss Appeal are incorporated herein by reference.

Additionally, Respondent’s counsel would note that any delay in filing and serving Respondent’s final brief is a product of the untimely passing of the father of Respondent’s counsel on January 20, 2020. Accordingly, for the reasons stated herein and in Nationstar’s Motion to Dismiss Appeal, Nationstar respectfully prays that the Court deny Appellants’ Motion and dismiss this pending appeal with prejudice.

Respectfully submitted on this 13th day of February 2020.



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Counsel for Respondent Nationstar Mortgage LLC

CERTIFICATE OF SERVICE

The undersigned certifies that Respondent Nationstar Mortgage LLC's *Motion to Dismiss Appeal on Mootness Grounds* was served on the parties to this action by depositing a copy thereof in the United States Mail, first class, postage prepaid, on February 13, 2020, to the following:


Barbara Gibbs
3108 Hidden Falls Drive
Buford, GA 30519

&
4257 Monterey Drive
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February 13, 2020

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The Honorable Jenny Abbott Kitchens
Clerk of Court, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: *Nationstar Mortgage, LLC d/b/a MR. Cooper, v. Barbara A. Gibbs and Melvin E. Gibbs et al.*
Florence Common Pleas No. 2018-CP-21-03238
Court of Appeals Number: 2019-000486

Dear Ms. Kitchens:

Enclosed please find an original and one (1) copy of Respondent Nationstar Mortgage LLC's *Objection to Appellant's Motion for Summary Reversal and Sanctions* in connection with the above-referenced matter. Please file the original and return the certified file stamped copy to me in the self-addressed envelope provided for your convenience.

By copy of this letter, I am serving Pro Se Appellants of record.

Thank you in advance for your kind consideration in this matter.

Sincerely,



Brian A. Calub

Attorney for Respondent Nationstar Mortgage LLC

Enclosures

cc: Barbara and Melvin Gibbs

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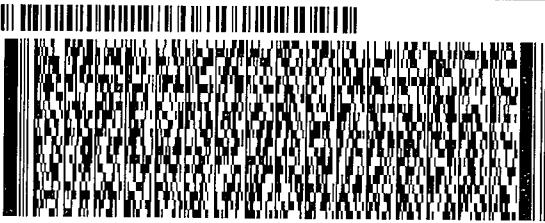
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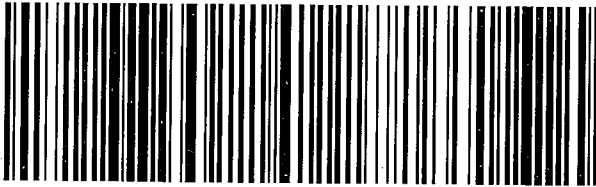
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