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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Cynthia Graham Howe, Master in Equity

Case No.: 2013-CP-26-02528
Unpublished Opinion No. 2019-UP-389 (S.C. Ct. App. filed December 18, 2019)
Appellate Case No. 2020-000510

Branch Banking and Trust Company.....Respondent,

v.

Cindy B. Hunt, Willow Greens Homeowners Association, Inc.,
C.J. Developers, LLC..... Defendants,

Of whom Cindy B. Hunt is the Petitioner.

RESPONDENT’S MOTION TO DISMISS

Sean M. Foerster (SC Bar # 77466)
ROGERS TOWNSEND LLC
1221 Main Street, 14th Floor (29201)
Post Office Box 100200
Columbia, South Carolina 29202-3200
(803) 771-7900
sean.foerster@rogerstownsend.com

Attorneys for Respondent Branch Banking and
Trust Company

Respondent Branch Banking and Trust Company (“Respondent”) hereby moves to dismiss the “Motion/Petition for Writ of Certiorari” (“Petition”) of Petitioner Cindy B. Hunt (“Hunt”) on the ground that she has violated the Court’s Order of March 20, 2020, by failing to serve her Petition by the deadline stated therein of March 30, 2020. As shown by the copy of the Certificate of Service filed herewith as Exhibit A and by the copy of the postmarked envelope in which Hunt served her Petition on Respondent filed herewith as Exhibit B, Hunt did not serve her Petition until March 31, 2020. The Petition is therefore untimely.

Hunt’s Petition is just the latest chapter in her frivolous litigation campaign against Respondent that began in 2009 and has since involved three failed federal court lawsuits¹ against Respondent, a failed attempt to remove² this foreclosure case to federal court after being unhappy with the Master in Equity’s dismissal of her counterclaims, 16 motions filed throughout this foreclosure action (all of which were denied by the Master in Equity), and meritless complaints against Respondent to the Horry County Police Department. Meanwhile, Hunt has not made a mortgage payment to Respondent since 2012. Despite having the time to conduct this fruitless 11-year long litigation campaign against Respondent, Hunt could not be bothered to comply with the specific extension deadline that she herself requested from the Court.

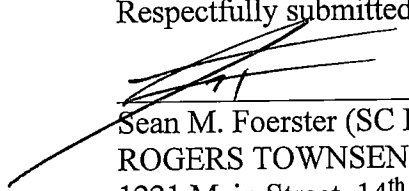
For these reasons, Respondent respectfully requests an Order dismissing or denying her Petition without further briefing.

[signature on the following page]

¹ *Hunt v. Branch Banking and Trust Company et al.*, C/A # 4:09-cv-02151-JMC (D.S.C. filed Aug. 13, 2009)(disposed through the granting of BB&T’s motion to dismiss); *Hunt v. Branch Banking and Trust Company et al.*, C/A # (D.S.C. filed Apr. 12, 2011) (disposed through the granting of BB&T’s motion to dismiss); *Hunt v. Branch Banking and Trust Company*, C/A # 4:12-cv-02216-MGL (D.S.C. filed Aug. 6, 2012)(filed in state court by Hunt, removed to federal court by BB&T, and then ultimately withdrawn by Hunt after BB&T filed a motion to dismiss).

² *BB&T v. Hunt et al.*, C/A # 4:14-CV-4352 (filed Nov. 10, 2014)(disposed through the granting of BB&T’s motion to remand).

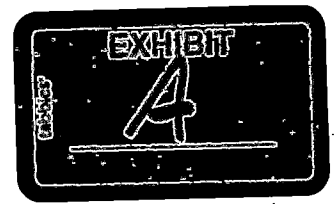
Respectfully submitted,



Sean M. Foerster (SC Bar # 77466)
ROGERS TOWNSEND LLC
1221 Main Street, 14th Floor (29201)
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Attorneys for Respondent Branch Banking and
Trust Company

April 3, 2020



CERTIFICATE OF SERVICE BY FAX / MAIL
Appellate Case No. 2016-001550

Certification: I hereby certify that the MOTION / PETITION FOR WRIT OF CERTIORARI complies with Rule 242, SCACR. I hereby certify that the petition of rehearing has been acted on by the Court of Appeals.

Proof of Service: I hereby certify that I have served the MOTION / PETITION FOR WRIT OF CERTIORARI of the Appellant on March 31, 2020, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following:

Documents Served: MOTION / PETITION FOR WRIT OF CERTIORARI with the following attachments:

1) Three LIS PENDENS; 2) Affidavit of Donna Brown; and 3) updated Affidavit of Attorney fees and costs for lawsuit #s 1-4 and this Motion / Petition; Certification; and Proof of Service.

MAILED TO:

Supreme Court of South Carolina
D. Shearouse, Clerk
PO Box 11330
Columbia, SC 29211

SC Court of Appeals
Jenny Abbott Kitchings, Clerk
PO Box 11629
Columbia, SC 29211

Sean Foerster
Rogers Townsend & Thomas, PC
PO Box 100200
Columbia, SC 29202

Thank You,
Cindy B. Hunt
Cindy B. Hunt, Pro Se, SC Bar # 65408.
195 D Willow Green Drive
Conway, SC 29526
843 488-1131



C Hunt
195 Willow Green Dr. Unit D
Conway, SC 29526-9382



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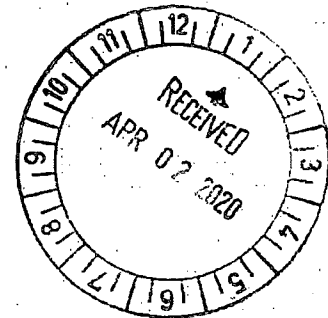
29202

U.S. POSTAGE PAID
FCM LG ENV
MYRTLE BEACH, SC
29579
MAR 31, 20
AMOUNT

\$2.20

R2307M152896-08

To: Sean Foerster
Rogers, Townsend & Thomas, PC
PO Box 100200
Columbia, SC 29202



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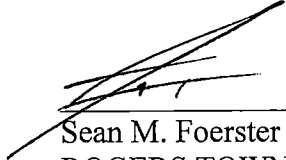
Cindy B. Hunt, Willow Greens Homeowners Association, Inc.,
C.J. Developers, LLC..... Defendants,

Of whom Cindy B. Hunt is thePetitioner.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent’s Motion to Dismiss on April 3, 2020, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following party of record:

Cindy B. Hunt, *pro se*
195 D Willow Green Drive
Conway, South Carolina 29526


Sean M. Foerster
ROGERS TOWNSEND LLC