

**RECEIVED**

**Apr 06 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely  
Thirteenth Judicial Circuit

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Case No. 2020-CP-23-04644  
Appellate Case No. 2021-000265

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Sula Adams, .....Appellant,

v.

PennyMac Loan Services, LLC; The United States of America,  
acting by and through its agency, The Secretary of Housing and  
Urban Development; Lanier Law Firm, LLC; Abby Robertson;  
Investors Title Insurance Company;  
and Equifax, LLC, ..... Respondents.

---

**RESPONDENT INVESTORS TITLE INSURANCE  
COMPANY’S MOTION TO DISMISS APPEAL**

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Pursuant to the South Carolina Appellate Court Rules, Respondent Investors Title Insurance Company (“Investors Title”), by and through its undersigned counsel, hereby moves the Court for an order dismissing this appeal as to Investors Title.

This motion is based on the following:

1. On February 3, 2021, the trial court entered its Order of Dismissal granting numerous motions to dismiss filed by various defendants including a motion to dismiss filed by

Investors Title. The Order of Dismissal was received by all counsel that day pursuant to the South Carolina Judicial Department's e-filing system.

2. Appellant was therefore required to serve her Notice of Appeal on all counsel on or before March 5, 2021. Rule 203(b)(1), SCACR.

3. The first time the undersigned counsel for Investors Title learned of an appeal was pursuant to an e-mail from the South Carolina Court of Appeals dated March 16, 2021, a copy of which is attached as **Exhibit A**. On that same day, the undersigned counsel for Investors Title attempted to retrieve the Notice of Appeal from the South Carolina Appellate Case Management System. Instead of finding a Notice of Appeal, the undersigned was able to retrieve only an Amended Notice of Appeal filed with the South Carolina Court of Appeals on March 9, 2021, a copy of which is attached as **Exhibit B**.

4. According to the Amended Proof of Service attached to the Amended Notice of Appeal, it appears the Amended Notice of Appeal was served on counsel for numerous parties on either March 4 or March 5, 2021. The Amended Proof of Service says it was served on counsel, including counsel for Investors Title, "by depositing a copy of same in the United States Mail, postage pre-paid on March 4, 2021, addressed to the Respondents' Attorneys of record" . . . "respectively, at their above addresses." Notably, while the Amended Proof of Service contains addresses for other counsel representing other parties, the undersigned's address is located nowhere on the Amended Proof of Service. The undersigned's address is not referenced in any document filed by Appellant with the South Carolina Court of Appeals. This, of course, shows why the undersigned never received any Notice of Appeal.

5. "A notice of appeal shall be served on all respondents within thirty (30) days after receipt of written notice of entry of the order or judgment." Rule 203(b)(1), SCACR.

6. “The notice of appeal shall be filed with the clerk of the lower court and the clerk of the appellate court within ten (10) days after the notice of appeal is served.” Rule 203(d)(1)(B), SCACR. In addition, the notice filed with the appellate court shall be accompanied by “[p]roof of service showing that the notice has been served on all respondents .” *Id.*

7. The Notice of Appeal “shall contain” the “names, mailing addresses, and telephone numbers of all attorneys of record and the names of the party or parties represented by each.” Rule 203(e)(1)(E), SCACR.

8. This appeal must be dismissed as to Investors Title because Appellant failed to perfect her appeal by failing to serve counsel for Investors Title with a Notice of Appeal as required by the South Carolina Appellate Court rules. Taking the Amended Proof of Service at face value, the Amended Notice of Appeal was served by mailing it to various addresses of the attorneys representing various parties, but the address for the undersigned was not listed, meaning Appellant’s Amended Proof of Service shows on its face that Appellant failed to serve the Amended Notice of Appeal (including the initial Notice of Appeal) on the undersigned as counsel for Investors Title.

9. Also, Appellant failed to file any Notice of Appeal with the Greenville County Court of Common Pleas as required by the South Carolina Appellate Court rules.

10. These defects are jurisdictional. *See Camp v. Camp*, 386 S.C. 571, 574-75, 689 S.E.2d 634, 636 (2010) (“Service of the notice of appeal is a ‘jurisdictional requirement, and this [c]ourt has no authority to extend or expand the time in which the notice of intent to appeal must be served.’” (quoting *Mears v. Mears*, 287 S.C. 168, 169, 337 S.E.2d 206, 207 (1985))).

For these reasons, this appeal should be dismissed as to Investors Title.

Respectfully submitted,

**CALLISON TIGHE & ROBINSON, LLC**

*s/ Demetri K. Koutrakos*

---

Demetri K. Koutrakos, SC Bar #11318

1812 Lincoln Street, Suite #200

P. O. Box 1390

Columbia, SC 29202-1390

Telephone: 803-404-6900

Facsimile: 803-404-6902

Email: [jimkoutrakos@callisontighe.com](mailto:jimkoutrakos@callisontighe.com)

**ATTORNEYS FOR RESPONDENT  
INVESTORS TITLE INSURANCE  
COMPANY**

April 6, 2021

3420.063\Appeal\MTD

# **EXHIBIT A**

## Kathy Romero

---

**From:** Clark, Tyler P. <tpclark@sccourts.org>  
**Sent:** Tuesday, March 16, 2021 5:29 PM  
**To:** talleylaw@aol.com; rbarker@wyche.com; Jim Koutrakos;  
mhenrikson@henriksonlaw.com; jason.richardson@nelsonmullins.com;  
matt.patterson@nelsonmullins.com; george.conits@usdoj.gov  
**Cc:** attorney@accesslawsc.com; swascom@wyche.com; Kathy Romero; mhenrikson29@gmail.com; roxanne.englin@nelsonmullins.com; kelli.martin@nelsonmullins.com; Singleton, Mary C.  
**Subject:** Sula Adams v. PennyMac Loan Services, LLC 2021-000265  
**Attachments:** TC Adams v. PennyMac - Initial Letter.pdf

Dear Counsel,

Please find correspondence from the Court of Appeals.

Sincerely,

**Tyler Clark**

Appeals Specialist  
SC Court of Appeals  
1220 Senate St.  
Columbia, SC 29201  
Ph. (803) 734-1890  
F. (803) 734-1839

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
CHIEF 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](http://www.sccourts.org)

March 16, 2021

Mr. Michael F. Talley, Sr., Esquire  
206 Green Avenue  
Greenville SC 29601

Re: Sula Adams v. PennyMac Loan Services, LLC  
Appellate Case No. 2021-000265

Dear Counsel:

This Court has received your notice of appeal, and the case has been assigned the appellate case number that appears above. Please use this number on all future correspondence relating to this matter.

All parties to this matter are advised that all filings must comply with the requirements of Rule 267 of the South Carolina Appellate Court Rules (SCACR). The SCACR are available online at [www.sccourts.org/courtreg](http://www.sccourts.org/courtreg). Additionally, any filings submitted by counsel admitted in South Carolina must include counsel's bar number.

The attention of the parties is directed to the order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. The order can be found at [www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2014-04-15-02](http://www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2014-04-15-02). Please note that the responsibility for insuring that information is redacted or sealed as required by this order rests with counsel and the parties. This office will *not* review filings for redaction or to determine if materials should be sealed.

Sula Adams, Appellant,

v.

PennyMac Loan Services, LLC; The United States of America, acting by and through its agency, The Secretary of Housing and Urban Development; Lanier Law Firm, LLC; Abby Robertson; Investors Title Insurance Company; TransUnion; Experian Information Solutions, Inc.; and Equifax, LLC, Respondents.

All future records in this matter should be changed to reflect this title. If you have any questions, please do not hesitate to contact this office.

Very truly yours,

A handwritten signature in blue ink that reads "Catherine J. Fanning, deputy". The signature is written in a cursive style.

CLERK

cc: Jason Alexander Richardson, Esquire  
Matthew Douglas Patterson, Esquire  
George John Conits, Esquire  
Matthew Holmes Henrikson, Esquire  
Demetri K. Koutrakos, Esquire  
Rita Bolt Barker, Esquire

# **EXHIBIT B**

THE STATE OF SOUTH CAROLINA

**RECEIVED**

In The Court of Appeals

MAR 09 2021

**APPEAL FROM GREENVILLE COUNTY SC Court of Appeals**  
Greenville County Court of Common Pleas  
**PERRY H. GRAVELY, CIRCUIT JUDGE**

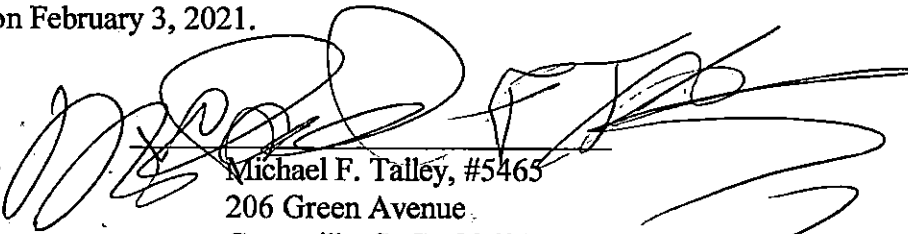
**Case No. 2020-CP-23-04644**

Sula Adams .....Appellant,  
vs.

PennyMac Loan Services, LLC; The United States of America, acting by and through Its Agency, The Secretary of Housing and Urban Development; Lanier Law Firm, LLC, Abbey Robertson, Investors Title Insurance Company and Equifax, LLC. .. Respondents.

**AMENDED  
NOTICE OF APPEAL**

Sula Adams appeals the Final Order of Dismissal of the Honorable Perry H. Gravelly, Circuit Judge for South Carolina, dated February 3, 2021. Appellant's Counsel was served with a written notice of entry of this Attached Order of Dismissal by electronic filing on February 3, 2021.



Michael F. Talley, #5465  
206 Green Avenue  
Greenville, S. C. 29601  
(864) 233-6229 (864) 275-7572  
(864) 370-0071 (fax)  
Attorney for the Appellants

**Other Counsel of Record:**

**Mr. Jason A. Richardson,**

**Matthew W. Patterson**

**Nelson and Mullins**

**Meridian/17th floor.**

**1320 Main Street**

**Columbia, S. C. 29201**

**Mr. George John Conits**

**for U. S. Dept. of Housing and Urban of Development**

**55 Beattie Place, Suite 700**

**Greenville, S.C. 29601**

**Mr. Matthew Holmes Henrikson**

**P.O. Box 26556**

**Greenville, S. C. 29616**

**(864) 242-40500**

**(864) 242-4277 (fax)**

**Rita Bolt Barker,**

**Wyche P.A.**

**200 E. CamperdownWay**

**Greenville, S. C. 29601**

**Attorneys for the Respondents**

THE STATE OF SOUTH CAROLINA

**RECEIVED**

In The Court of Appeals

MAR 09 2021

SC Court of Appeals

**APPEAL FROM GREENVILLE COUNTY**  
Greenville County Court of Common Pleas  
**PERRY H. GRAVELY, CIRCUIT JUDGE**

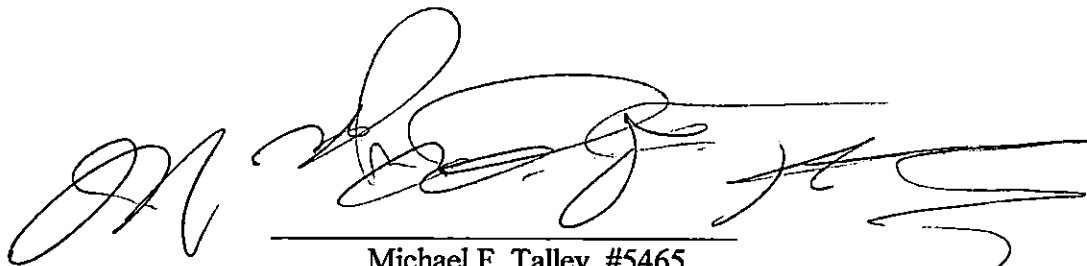
**CASE NO. 2020-CP-23-04644**

Sula Adams .....Appellants,  
v.

PennyMac Loan Services, LLC; The United States of America, Acting by and through  
The Secretary of Housing and Urban Development, Lanier Law Firm, LLC, Abbey  
Robertson and Investors Title Insurance Company,.....Respondents.

**AMENDED  
PROOF OF SERVICE**

I certify that I, as the Appellant's undersigned attorney, have served a copy  
of the Appellant's Notice of Appeal upon the Respondents, PennyMac Loan Services,  
LLC, The United States of America, Acting by and through its Agency, The Secretary  
of Housing and Urban Development, Lanier Law Firm, LLC, Abbey Robertson, and,  
Investors Title Insurance Company by depositing a copy of same in the United States  
Mail, postage pre-paid on March 4, 2021, addressed to the Respondents' Attorneys of  
record, Mr. Jason Alexander Richardson and Mr. Matthew Douglas Paterson  
for PennyMac Loan Services, LLC, Mr. George John Conits for the U. S. Secretary of  
Housing and Urban Development, Mr. Mathew Holmes Henrikson for Lanier Law Firm,  
LLC and Abbey Robertson, Mr. Demetri Koutrakos for Investors Title Insurance Co.,  
and Ms. Rita Bolt Barker, for Equifax, LLC, respectively, at the above addresses.



---

Michael F. Talley, #5465  
206 Green Avenue  
Greenville, S.C. 29601  
(864) 233-6229 (864) 275-752  
(864) 370-0071 (fax)

Dated: March 4 , 2021  
and March 5, 2021

**MICHAEL F. TALLEY**  
**Attorney at Law**  
206 Green Avenue  
Greenville, South Carolina 29601  
Across from Greenville High School  
[talleylaw@aol.com](mailto:talleylaw@aol.com)

**RECEIVED**  
MAR 09 2021  
SC Court of Appeals

March 5, 2021

Post Office Box

Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
P. O. Box 11629  
Columbia, S. C. 29211

Phone: 864-233-6229

Fax: 864-370-0071

RE: Sula Adams vs. PennyMac Loan Services, LLC, et al;  
Case No. 2020-CP-23-04644

Dear Clerk of Court:

Enclosed please find the original and six (6) copies of our **Amended** Notice of Appeal for filing on behalf of the Appellant, Sula Adams, along, with our Amended Proof of Service upon the Respondents' attorney, Mr. Jason Alexander Richardson, Mr. Matthew Douglas Patterson, Mr. George John Conits, Mr. Matthew Holmes Henrikson, Mr. Demetri Koutrakos and Ms. Rita Bolt Barker.

We enclosed our office check of \$250.00.00 for the filing fee yesterday with our Original Notice of Appeal.

Along with this letter and a copy, we are filing a copy of the Appellants' copy of our Amended Proof of Delivery.

After filing, please forward our office a filed copy of our Amended Proof of Service in the enclosed self-addressed-stamped envelope.

Thank you.

Yours truly

Michael F. Talley

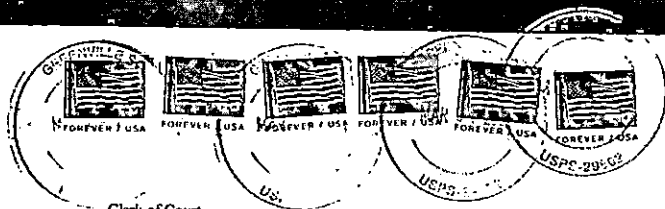


MFT/

Enclosures::

cc: Greenville County Clerk of Court  
All Respondents' Attorneys.

Mr. Michael F. Talley, LLC  
Attorney at Law  
206 Green Avenue  
Greenville, S.C. 29601



Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
P. O. Box 11629  
Columbia, S. C. 29211

**RECEIVED**  
MAR 08 2021  
SC Court of Appeals



STATE OF SOUTH CAROLINA )

IN THE COURT OF COMMON PLEAS

COUNTY OF GREENVILLE )

THIRTEENTH JUDICIAL CIRCUIT

**RECEIVED**

Sula Adams, )

MAR 09 2021

Plaintiff, )

SC Court of Appeals

vs. )

**ORDER OF DISMISSAL**

PennyMac Loan Services, LLC; The )

2020CP2304644

United States of America, acting by and )

through its agency, The Secretary of )

Housing and Urban Development; Lanier )

Law Firm, LLC; Abby Robertson; )

Investors Title Insurance Company; )

TransUnion; Experian Information )

Solutions, Inc.; and Equifax, LLC, )

Defendants. )

This matter came before the Court upon multiple motions. Plaintiff filed a Motion for Temporary Restraining Order ("TRO"). Defendants Lanier Law Firm ("Lanier"); Abby Robertson ("Robertson"); Investors Title Insurance Company ("Investors"); PennyMac Loan Services, LLC ("PennyMac"); United States of American, acting by and through its Agency, The Secretary of Housing and Urban Development ("HUD") filed Motions to Dismiss. Plaintiff informed the Court that she was in settlement negotiations with Defendants TransUnion; Experian Information Solutions, Inc.; and Equifax, LLC. As to Plaintiff's Motion for TRO against HUD, she withdrew her motion pursuant to HUD's agreement not to garnish wages during the pendency of this action.

This action arises out of the failure of Plaintiff to properly satisfy two existing mortgages in connection with the sale of her home. Plaintiff sold her house to a third-party and at the time of the closing on September 30, 2016, there were two mortgages against the property. For some

reason, only one of the mortgages was satisfied from the closing proceeds, which left the other mortgage still outstanding. Plaintiff contends the error was a result of Defendants failure to properly reference both mortgages in the payoff statements. As a result of the outstanding mortgage, HUD sought garnishment of Plaintiff's wages to satisfy the debt. Plaintiff brought this action against all parties involved in the closing for claims of breach of contract, intentional infliction of emotional distress, and unfair trade practices. Subsequently, the current Motions to Dismiss were filed. All of these Motions to Dismiss have various grounds for their dismissal, but all contend that this action was not commenced with the Statute of Limitations. The Court will address the Statute of Limitations action and then address the specific grounds for dismissal related to each Defendant's Motion.

To grant a Motion to Dismiss, the court "must base its ruling solely on allegations set forth in the complaint." *Doe v. Marion*, 373 S.C. 390, 395, 645 S.E.2d 245, 247 (2007). "The complaint should not be dismissed merely because the court doubts the plaintiff will prevail in the action." *Marion* at 395, 645 S.E.2d 245, 248. For a Motion to Dismiss, the Court looks at the facts alleged in the light most favorable to the plaintiff to determine whether the plaintiff is entitled to relief on any legal theory. *Marion* at 395, 645 S.E.2d 245, 247.

All Defendants asserted that the Statute of Limitations bars this action, which is supported by looking only at the Complaint. The Complaint asserts causes of action for breach of contract, intentional infliction of emotional distress and violation of the S.C. Unfair Trade Practices Act. The relevant statute of limitations for all of these causes of action is three years as provided by S.C. Code Ann. §15-3-530 and §39-5-150. The event which gives rise to Plaintiff's claim took place on September 30, 2016. The Summons and Complaint was not filed until October 8, 2020. In the Complaint, Plaintiff alleges she received a letter dated June 12, 2017 from Robertson

outlining the issues and acknowledging that the second mortgage had not been satisfied (Complaint, Paragraph 16). Plaintiff further alleges she received a letter dated August 25, 2017 from HUD demanding payment on the outstanding loan and that it planned to pursue garnishment of wages for payment of the debt. (Complaint, Paragraph 17). As of these dates, Plaintiff was advised the second mortgage had not been paid off and she would have clearly known she had a claim against the responsible parties. However, Plaintiff failed to commence an action until October 8, 2020, more than four years after the closing and more than three years after she was advised in writing of the issues. Plaintiff argues equitable tolling should apply as she was awaiting an administrative decision from HUD on the wage garnishment issue. Based on the Complaint, Plaintiff alleges she objected to wage garnishment because of financial hardship and because Robertson was to blame for providing incorrect information about the two mortgages. This would not toll the statute because she was merely contesting HUD's right to garnish her wages and not awaiting any type of decision on whether the debt was owed. As a practical matter, Plaintiff should have been aware that she received more proceeds than she was entitled to at closing and should have known one of the mortgages had not been paid off. Therefore, the Court finds this action was not commenced within the applicable statute of limitations and Defendants' Motions are GRANTED.

Although the each of the Defendants filed additional grounds to support their Motions to Dismiss, the Court has not addressed those because the dismissal was granted based on the Statute of Limitations.

Given the failure of Plaintiff to file this action within a timely manner under the Statute of Limitations, Defendants HUD's, Lanier's, Robertson's, Investor's, and PennyMac's Motions to Dismiss are GRANTED.

**IT IS SO ORDERED.**

*Judge Gravely's Signature Page to Follow*



Greenville Common Pleas

**Case Caption:** Sula Adams vs. PennyMac Loan Services LLC , defendant, et al  
**Case Number:** 2020CP2304644  
**Type:** Order/Dismissal

So Ordered

s/ Honorable Perry H. Gravely, #2755

Electronically signed on 2021-02-03 10:58:11 page 5 of 5

**RECEIVED**  
**Apr 06 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely  
Thirteenth Judicial Circuit

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Case No. 2020-CP-23-04644  
Appellate Case No. 2021-000265

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Sula Adams, .....Appellant,

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PennyMac Loan Services, LLC; The United States of America,  
acting by and through its agency, The Secretary of Housing and  
Urban Development; Lanier Law Firm, LLC; Abby Robertson;  
Investors Title Insurance Company; TransUnion; Experion Information  
Solutions, Inc.; and Equifax, LLC, ..... Respondents.

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**PROOF OF SERVICE**

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I hereby certify that, on this date, the **Respondent Investors Title Insurance Company's Motion to Dismiss Appeal** was served on counsel of record via AIS email, pursuant to Supreme Court Order dated March 20, 2020, as amended on May 29, 2020, as follows:

Michael F. Talley, Esquire  
206 Green Avenue  
Greenville, SC 29601  
Email: [talleylaw@aol.com](mailto:talleylaw@aol.com)  
*(Attorney for Appellant)*

Matthew D. Patterson, Esquire  
Jason A. Richardson, Esquire  
Nelson Mullins Riley & Scarborough, LLP  
P. O. Box 11070  
Columbia, SC 29211

Email: [matt.patterson@nelsonmullins.com](mailto:matt.patterson@nelsonmullins.com)  
Email: [Jason.richardson@nelsonmullins.com](mailto:Jason.richardson@nelsonmullins.com)  
(Attorneys for Respondent PennyMac Loan Services, LLC)

George J. Conits, Esquire  
Assistant United States Attorney  
55 Beattie Place, Suite #700  
Greenville, SC 29601  
Email: [George.conits@usdoj.gov](mailto:George.conits@usdoj.gov)  
(Attorney for Respondent USA/HUD)

Matthew H. Henrikson, Esquire  
Henrikson Law Firm, LLC  
P. O. Box 26554  
Greenville, SC 29616  
Email: [mhenrikson@henriksonlaw.com](mailto:mhenrikson@henriksonlaw.com)  
(Attorney for Respondents Lanier Law Firm, LLC and Abby Robertson)

Rita B. Barker, Esquire  
Wyche Law Firm, PA  
P. O. Box 728  
Greenville, SC 29601-3512  
Email: [rbarker@wyche.com](mailto:rbarker@wyche.com)  
(Attorneys for Respondent Equifax, LLC)

A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

s/ Demetri K. Koutrakos  
Demetri K. Koutrakos

April 6, 2021

3420.063\Appeal\POS-MTD

## Kathy Romero

---

**From:** Kathy Romero  
**Sent:** Tuesday, April 6, 2021 11:52 AM  
**To:** 'talleylaw@aol.com'  
**Cc:** 'matt.patterson@nelsonmullins.com'; 'jason.richardson@nelsonmullins.com'; 'george.conits@usdoj.gov'; 'mhenrikson@henriksonlaw.com'; 'rbarker@wyche.com'; Jim Koutrakos  
**Subject:** Sula Adams vs. PennyMac Loan Services, LLC, et al. / Appellate Case No. 2021-000265  
**Attachments:** Motion to Dismiss with Exhibits.pdf; Proof of Service - MTD.pdf; Clerk.001.pdf

Dear Mr. Talley,

Attached please find the Respondent Investors Title Insurance Company's Motion to Dismiss Appeal, Proof of Service, and letter to the appellate clerk regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing. Thank you.

With kind regards,

Kathy Romero  
Legal Assistant to Demetri "Jim" K. Koutrakos, Esq.  
Callison Tighe & Robinson, LLC  
1812 Lincoln Street, Suite #200  
P. O. Box 1390  
Columbia, SC 29202-1390  
Telephone: 803-404-6900  
Facsimile: 803-404-6902  
Email: [kathyromero@callisontighe.com](mailto:kathyromero@callisontighe.com)

*The information contained in this electronic message contains privileged and confidential information intended only for the use of the addressee named above. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you received this e-mail in error, please immediately notify us by telephone and permanently delete the e-mail and destroy any printed copies immediately. Thank you.*

Demetri "Jim" K. Koutrakos - MEMBER

803-404-6900

[JimKoutrakos@callisontighe.com](mailto:JimKoutrakos@callisontighe.com)

**RECEIVED**

**Apr 06 2021**

**SC Court of Appeals**

April 6, 2021

**VIA EMAIL:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

RE: Sula Adams vs. PennyMac Loan Services, LLC, et al.  
Appellate Case No. 2021-000265

Dear Ms. Kitchings:

Enclosed herewith please find the Respondent Investors Title Insurance Company's Motion to Dismiss Appeal, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email.

This firm's check no. 121449 in the amount of \$50 in payment of the required filing fee is being mailed separately to the court today.

The enclosed Motion has been served upon counsel of record today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

*s/ Demetri "Jim" K. Koutrakos*

Demetri "Jim" K. Koutrakos

DKK:ksr

Enclosures

cc (via email): Michael F. Talley, Esquire  
Matthew D. Patterson, Esquire  
Jason A. Richardson, Esquire  
George J. Conits, Esquire  
Matthew H. Henrikson, Esquire  
Rita B. Barker, Esquire

3420.063\Appeal\Clerk.001