

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

JUL 21 2021

**SC Court of Appeals**

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APPEAL FROM SUMTER COUNTY  
MASTER IN EQUITY

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Case No. 2015-CXP-43-1981

Appellate Case No. 2021-000230

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Edward Mays and Corrine Mays.....

Respondents,

Irene L. Myers.....

Appellant.

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RETURN TO RESPONDENTS' REPLY

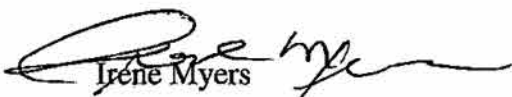
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Respondents have attempted to mislead the Court in this matter. First, the Respondents have engaged in various acts to waylay the Appellant throughout this case. The Respondents attempted to put forth a motion to dismiss without providing proper service to the Appellant. Fortunately, this Court caught the omission and directed the Respondents to serve Appellant. Secondly, the Respondents in making their reply to Appellant's Return did not properly serve the Appellant. The Appellant only discovered Respondents' reply when looking online to check the status of the case. Looking online at the Respondents' Notice of Service, Respondents have stated that Appellant was served on June 24, 2021. On July 19, 2021, Appellant received

Respondents' reply dated July 13, 2021, which was mailed from Columbia and postmarked for July 17, 2021. This is not the first time that the Respondents have either completely failed to serve papers or unreasonably delayed service to Appellant. The Respondents failed to properly serve and notify Appellant of both a prior hearing held in October of 2019 that restored this matter back to the Court Roster and the subsequent alleged trial of January 8, 2020. The Respondents' prior failure to properly serve Appellant is the result of the Respondents' attempt to avoid having the appropriate laws of adverse possession instituted within this case and to avoid the hearing of Appellant's prior Motion to Dismiss for Lack of Cause.

Setting aside the issues relating to Respondents' failure to serve, the Respondent incorrectly argues that the Lower Court has no responsibility to provide Appellant with the contact information for the Court Reporter. SC Court Rules specifically state that transcripts for a Master of Equity case must be obtained through the Master of Equity. Within this Court files are letters from the Clerk of Common Pleas and Director of Court Administration, letters stating that Court Reporter contact information must be obtained from the Master in Equity.

It is Appellant's belief that there are Constitutional and Due Process issues going to the heart of this case. The hearing and Orders made by Master in Equity Michael Jordan were made without the required Order of Reference pursuant to SC Rule 53b. This case was dismissed on October 1, 2018. Thereafter, Master In Equity Jordan took illegal jurisdiction of this matter without having the required Order of Reference. Appellant is asking that this Court send this matter back to the proper lower Court for adjudication.

  
Irene Myers  
Dated July 2, 2021

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Appellate Case No. 2021-000230

Edward Mays and Corrine Mays.....

Respondents,

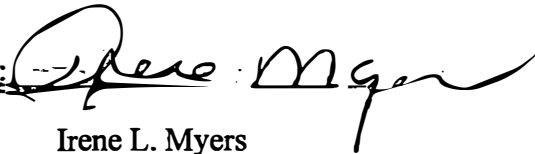
Irene L. Myers.....

Appellant.

PROOF OF SERVICE

I affirm, under the penalty of perjury, that I have served the Reply to the Motion to Dismiss on the Respondents via their counsel, Patrick M. Killen by depositing a copy of it in the United States Mail, postage prepaid, on July 21, 2021, addressed to Patrick M. Killen, 1 Law Range, Suite B, Sumter, South Carolina 29150.

Sworn to Before Me This 21<sup>st</sup> Day of  
July 2021

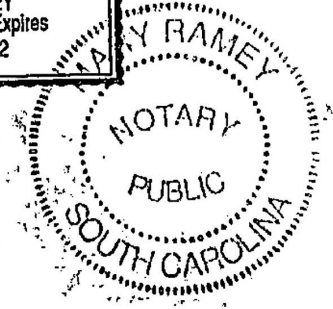
By: 

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Rembert, South Carolina 29128  
(803) 757-5155  
[rosesbyirene@hotmail.com](mailto:rosesbyirene@hotmail.com)



MARY RAMEY  
My Commission Expires  
July 17, 2022

Sumter, South Carolina  
Date: July 21, 2021



Orlene Myers  
3150 Spencer Road  
Rambert, SC 29128

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SC Court of Appeals

Clerk of Court  
South Carolina Court of Appeals  
1220 Senate St  
Columbia, SC