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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
MASTER IN EQUITY

The Hon. Michael M. Jordon, Master In Equity

Case No. 2015-CP-43-1981

Appellate Case No. 2021-000230

Edward Mays and Corrine Mays.....
Respondents,

v.

Irene L. Myers.....
Appellant.

REPLY TO RETURN TO MOTION TO DISMISS

Respondents by and through their undersigned attorney, file this reply to Appellant's Return to Respondents' Motion to Dismiss.

Appellant represented herself in this Court of Common Pleas matter which was adjudicated by the Hon. Michael B. Jordon, Sumter County, Master-in-Equity. Appellant is *pro se* before this Honorable Court.

Appellant in her Return to Motion to Dismiss states, "It is Appellant's belief that when the Honorable H. Bruce Williams gave an Order granting an extension, it was done with the expectation that the Master In Equity would perform his required duty of providing the Court Reporter's contact information." Respondents would point out that it is not the responsibility nor

the duty of the Master-in-Equity to locate and identify the court reporter for a litigant. That responsibility lies solely with the litigant who is interested in obtaining that information. Appellant goes on to make a claim that “the Court web site refers the Appellant to the Master in Equity for Court Reporter contact information.” When viewing the web page for the Sumter County Master-in-Equity, the South Carolina Court of Appeals, the South Carolina Courts Frequently Asked Questions, and the South Carolina Court Administration, there is no mention of the Appellant’s claim.

Also, the Appellant has failed to comply with this Honorable Court’s July 21, 2021, Order granting Appellant an additional 20 days from the date of its Order to provide proof that she has made “satisfactory arrangements (including agreement regarding payment for the transcript), in writing with the court reporter for furnishing the transcript.” It is now August 27, 2021, and Appellant failed to submit evidence that she made satisfactory arrangements in writing with the court reporter for furnishing the transcript or ask for an extension of the 20 days.

Lastly, the Appellant’s assertion that her race and gender are of issue is offensive and should be stricken from the record of this matter. Appellant claims in her Return to Motion to Dismiss that,

It is the belief of Appellant that either there are no transcripts, or if there are, the transcripts will show that Master in Equity Jordan intentionally made ruling contrary to law and the facts of this Case in order to assist Respondent’s attorney, circumvent South Carolina Adverse Possession Laws as it applies to adjacent landowner, and violate the rights of a female African American pro se litigant.

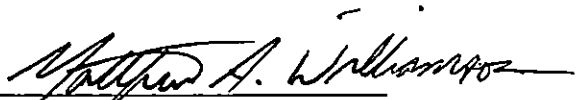
CONCLUSION

For the reasons stated above, the Court should dismiss the above-captioned appeal.

[Signature Page Follows]

Respectfully submitted,

SHULER-KILLEN, LLC

By: 

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Sumter, South Carolina

Date: August 27, 2021

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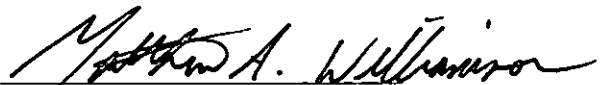
Irene L. Myers.....

Appellant.

PROOF OF SERVICE

I certify that I have served the Reply to Return to Respondent's Motion to Dismiss on Irene L. Myers by depositing a copy of it in the United States Mail, postage prepaid, on August 27, 2021, addressed to the Pro Se Appellant, Irene L. Myers, 3150 Spencer Road, Rembert, SC 29128.

SHULER-KILLEN, LLC

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Sumter, South Carolina
Date: August 27, 2021

REAL ESTATE & BUSINESS
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REBECCA L. WADE



LITIGATION
PATRICK M. KILLEN
MATTHEW A. WILLIAMSON

August 27, 2021

The South Carolina Court of Appeals
Attn: Jenny Abbott Kitchings – Clerk of Court
P.O. Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

Re: Edward Mays v. Irene L. Myers
Appellate Case No. 2021-000230

Dear Mrs. Kitchings:

Enclosed for your records please find the original Reply to Return to Motion to Dismiss with the attached Proof of Service. A copy of the same has been sent via electronic mail.

Sincerely,

Matthew A. Williamson
Attorney at Law

MAW/law
Enclosure

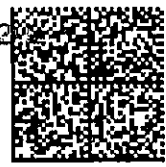



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