

STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND)
)
 NATIONSTAR MORTGAGE, LLC)
 dl/b/a MR. COOPER,)
)
 RESPONDENT,)
)
 vs.)
)
 BARBARA A. GIBBS, MELVIN E.)
 GIBBS, and WESTBROOK PHASE IV)
 HOMEOWNERS' ASSOCIATION,)
)
 APPELLANTS.)

IN THE COURT OF APPEALS
 OF SOUTH CAROLINA

RECEIVED

SEP 30 2021

SC Court of Appeals

CASE No: 2019-000486

APPELLANTS' SECOND
 OPPOSITION TO
 RESPONDENT'S SUBSTITUTION
 OF COUNSELS and
 MOTION FOR CLARIFICATION

TAKE NOTICE: On or about the 10th day of November 2020, Appellants notified this Court: without leave of this Court, H. Guyton Murrell, Esq., disappeared from the record and Brian A. Calub, Esq., mysteriously appeared as attorney of record; AND, Respondent having filed a Proof of Claim (POC) in the bankruptcy court based on the contract between Barbara A. Gibbs and Bank of America (Nationstar) – voided the circuit court judgment: a party may not file the same claim in state and federal court!

COMES NOW, the above named Appellants – for the 3rd time and move this Court to DENY Respondent's 3rd Substitution of Counsel: Respondent's current attorney is not properly before this Court; and SANCTION RESPONDENT AND THEIR ATTORNEYS. The reasons for this opposition and Motion for Clarification are set forth below:

Part and partial to Respondent's criminal enterprise: Respondent's attorney, Brian A. Calub, Esq., without leave of this Court: substituted their representation for that of H. Guyton Murrell, Esq. Pursuant to the US Constitution and South Carolina Constitution: McGuire Woods must not be permitted to *seize* the authority of this court....

Appellants aver and incorporate by reference each and every paragraph of their 2nd Opposition to Appellee's Substitution of Counsel as if each paragraph was set forth verbatim.

I. PRELIMINARY STATEMENT

The signature of an attorney affixed to any and all pleadings – certify the veracity of said pleadings. McGuire Woods' client Nationstar Mortgage (Bank of America) business records prove: Bank of America (Hereinafter BOA) and their attorneys committed PERJURY, SUBORNATION OF PERJURY and FRAUD ON THE COURT – criminal conduct that continues in this court; and evidencing full and complete knowledge Appellants never missed a mortgage payment – FRAUDULENT FORECLOSURE! The fraudulent Assignment of Mortgage: NATIONSTAR MORTGAE DO NOT HAVE STANDING IN THIS CASE!!!

II. STATEMENT

McGuire Woods having full and complete knowledge of their clients' crimes committed in violation of the Racketeering Influence Corrupt Organization Act [RICO] have not corrected the crimes committed by disclosing said crimes and requesting the RECORD be corrected in this court.

McGuire Woods is content to pay BRIBES to politicians – disguised as campaign contributions – “forcing” politicians to exact [t]heir influence on this court and other courts.

III. STATEMENT OF FACTS

At all times relevant to BOA (Nationstar Mortgage) filed their illegal foreclosure BOA had empirical self-proving business records Appellant never missed a mortgage payment. Therefore,

BOA's only objective was to criminally destroy Gibbs to protect [t]heir \$3 [T]rillion FRAUD committed against Appellants, 10 million Homeowners SIMILARLY SITUATED, the Treasury Department, Fannie Mae and Freddie Mac.

Unless and until McGuire Woods admit their involvement in BOA's criminal enterprise and correct the record before this court – the motion must be denied.

III. STATEMENT OF THE CASE

BOA has manipulated this court as part and partial to [t]heir criminal enterprise for the sole purpose of destroying Gibbs – to prevent [t]heir \$3 [T]rillion FRAUD!

The SC Supreme Court, SC Attorney General by and through this court seek to conceal: but for [t]heir improper and/or illegal conduct William “Bill” Cosby would have been in prison and could not have RAPED – ANDREA CONSTAND; Gibbs would have obtained monetary judgments for the more than 100 women Bill Cosby raped, and recovered stolen art valued at more than \$ 50 [B]illion....

IV. ARGUMENT

Over the course of 12 years this court has allowed BOA and [t]heir attorneys – including but not limited to McGuire Woods to maintain a FORECLOSURE that BOA’s BUSINESS RECORDS prove as a fraud:

**NO ATTORNEY MUST BE ALLOWED TO WITHDRAW FROM OR BE
SUBSTITUTED: UNLESS AND UNTIL THE CRIMES ARE
EXTINGUISHED!!!**

[T]his case continues the 12 years of **HELL** to protect Bank of America’s \$\$\$ million in political contributions: paid to protect Bank of America’s \$\$\$3 [T]rillion FRAUD of 10 million Homeowners, the Treasury Department, Fannie Mae and Freddie Mac and the pedophiles and rapists involved in “the” theft of \$50 billion of

Black Art.

DO NOT DEFUND THE POLICE!!! ...DEFUND THE COURTS!!!

Bank of America's business records [t]hey submitted in this case proves BEYOND A REASONABLE DOUBT – Bank of America and their attorneys committed PERJURY, SUBORNATION OF PERJURY AND FRAUD ON THE COURTS: aided by Judge Hagenau.

Jail able crimes: Perjury, or Subornation of Perjury or Fraud on the Court: the Trifecta of things to avoid at any cost for attorneys. Yet, You and Judge Hagenau will destroy me to protect political campaign contribution: You have allowed McGuire Woods to turn this Court into an legally impotent WHOREHOUSE. And as I say this, I must reach out and extend an apology to every WHORE who seek to earn an honest living....

This court is complicit in or passively allows Bank of America to destroy Gibbs and every value Gibbs has held and/or acquired over eight (8) decades, to wit:

Gibbs' proudest moment was not passing the BAR EXAM; but rather scoring almost 140 of 150 on the ethics exam! Now, this court – on behalf of BOA have subrogated legal ethics to an oxymoron...

Gibbs' pleadings included BOA's self-proving documents of Perjury, Subornation of Perjury and Fraud on the courts, Gibbs' bank records negating every

issue ***“raised”*** in the illegal foreclosure – every relevant and material fact was in dispute. Yet, the trial judge Appointed BOA’s attorney as REFEREE to write Summary Judgment Order....

My brother was killed in Vietnam 55 years ago. Four months after his death; I obtained a pass to leave the Charleston Naval Hospital to drive my family back to North Carolina. While in uniform (US Air Force); the Klux Klux Klan attempted to kill me and my family, 30 miles north of Charleston, SC. **THIS COURT HAS KILLED WHAT THE KLAN COULD NOT!** To prophesize our former president: I regret serving this “Shit Hole” country.

During my career as a New York City Police Officer: 50 years ago my partner was killed – the bullet pierced his heart and HE was dead before his body fell to the ground. I sat by his wife’s hospital bed for days as she struggled to save their unborn child – the child died. **WE FOUGHT THE WRONG CRIMINALS; BOA AND THE COURTS SHOULD HAVE BEEN OUR TARGETS.**

It is evident politicians aided by courts, do not have concern for the **LAW** or Homeowners defrauded by Bank of America who lost their homes: including but not limited to: the Black women whose sons were murdered because they were forced back to lives they fled; the 90 year old man who engaged in a shootout with police because he refused to leave his home; the elderly couple who committed suicide or the more than 10,000 people who have committed suicide as a **DIRECT** result of this ***BANK INDUCED MORTGAGE CRISIS***.

3rd Degree Murder: The unintentional killing of another through an eminently dangerous act committed with a depraved mind and without regard for human life:

Bank of America: aided by politicians and courts!!! IN YOUR ATTEMPT TO CONCEAL BANK OF AMERICA'S \$\$\$ 3 [T]RILLION FRAUD IN RETURN FOR \$\$\$ TENS OF MILLION IN "POLITICAL" CONTRIBUTIONS a/k/a BRIBES!!!

Even though Bank of America's business records: Bank of America filed in this case. – PROVES BEYOND A REASONABLE DOUBT (actually: 100%) we never missed a mortgage payment – McGuire Woods, disguised as campaign contributions may control this court and determine which attorneys may litigate on behalf of BOA and this court must remain silent.

The trappings of Mahogany and Marble cannot hide the fact this Court is no more than a continuing criminal enterprise: existing to ensure those who give \$\$\$ millions in political contributions – escape "paying" for [t]heir crimes.

This case represents the fact I will die before I will allow judges to hide their illegal and/or improper conduct in **CODE: THE DUMB IGNORANT "NIGGER" DON'T KNOW THE LAW!!!** ...McGuire Woods has the sole authority to determine when and how attorneys appear before this court....

Gibbs **will not** be memorialized in law – as in song and literature:

'Oh Susanna' by, Stephen Foster:

I jumped aboard the telegraph and traveled down the river,
Electric fluid magnified, and killed five hundred Nigger.
The bullgine bust, the horse ran off, I really thought I'd die;
I shut my eyes to hold my breath—Susanna, don't you cry.

"Jim Baker's Blue Jay Yarn," by Mark Twain:

Jim Baker elaborates on his high opinion of jays, offering the opinion that they are "just as much a human as you be," and concluding that "a jay will lie, a jay will steal, a jay will deceive, a jay will betray; and four times out of five, a jay will go back on his solemnest promise."


... "And with that, away he went. You never see a bird work so since you was born. He laid into his work like a **nigger**, and the way he hove acorns into that hole for about two hours and a half was one of the most exciting and astonishing spectacles I ever struck.

CONCLUSION

The corrupt politicians and judges of South Carolina part and partial to Bank of America's criminal enterprise that has resulted in CAPITAL MURDER.

WHEREFORE, must hold a hearing to determine the attorney of record; **SUMMARILY REVERSE** the lower court and dismiss Respondent's case **WITH PREJUDICE**, sanction Respondent and their attorneys, and grant such other and further relief, at law and equity, general or special, to which Appellants have shown themselves justly entitled.

Respectfully Submitted,



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(843) 610 0674
mgibbs70@aol.com

September 26, 2021
Buford, GA

Part 8: Loan Payment History from First Date of Default

A. Date	D. Contractual payment amount	C. Funds received	Account Activity		F. Contractual due date	G. Pmt, Int & esc due balance	How Funds Were Applied/Amount Enclosed				L. Unapplied funds	M. Balance After Principal	N. Amount Accrued Interest	O. Escrow balance	P. Fees / Charges	Q. Unapplied funds balance	
			D. Amount Incurred	E. Description			H. Amount to principal	I. Amount to Interest	J. Amount to escrow	K. Amount to fees or charges							
12/1/2011	\$ 2,258.02			Monthly Mortgage Payment Due	12/1/2011	\$ 2,258.02											
12/1/2011		\$ -	\$ -	COUNTY TAX DEBURSED	12/1/2011	\$ 2,258.02			\$ (1,032.00)			\$ 3,022.01	\$ -	\$ 1,411.60	\$ -	\$ -	
12/5/2011		\$ 1,058.82	\$ -	MISC ADJ	12/1/2011	\$ 2,258.02						\$ 3,022.01	\$ -	\$ (81.00)	\$ -	\$ -	
12/5/2011		\$ (1,058.82)	\$ -	MISC ADJ	12/1/2011	\$ 2,258.02						\$ 3,022.01	\$ -	\$ (81.00)	\$ -	\$ 1,058.82	
1/1/2012	\$ 2,258.02		\$ 2,258.02	Monthly Mortgage Payment Due	1/1/2012	\$ 4,517.04						\$ 3,022.01	\$ -	\$ (81.00)	\$ -	\$ -	
1/1/2012		\$ 2,258.02	\$ -	REGULAR PAYMENT	1/1/2012	\$ 2,258.02	\$ 445.03	\$ 1,010.64	\$ 202.56	\$ -	\$ (0.00)	\$ 3,022.01	\$ -	\$ 121.56	\$ -	\$ -	\$ (0.00)
2/1/2012	\$ 2,258.02		\$ 2,258.02	Monthly Mortgage Payment Due	2/1/2012	\$ 4,517.04						\$ 3,022.01	\$ -	\$ 121.56	\$ -	\$ -	
2/1/2012		\$ 2,258.02	\$ -	REGULAR PAYMENT	2/1/2012	\$ 2,258.02	\$ 454.16	\$ 1,002.91	\$ 202.95	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 324.10	\$ -	\$ -	\$ (0.00)
3/1/2012	\$ 2,258.02		\$ 2,258.02	Monthly Mortgage Payment Due	3/1/2012	\$ 4,517.04						\$ 3,022.01	\$ -	\$ 324.10	\$ -	\$ -	
3/1/2012		\$ 2,258.02	\$ -	REGULAR PAYMENT	3/1/2012	\$ 2,258.02	\$ 458.57	\$ 1,000.70	\$ 202.53	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 628.05	\$ -	\$ -	\$ (0.00)
4/1/2012	\$ 2,258.02		\$ 2,258.02	Monthly Mortgage Payment Due	4/1/2012	\$ 4,517.04						\$ 3,022.01	\$ -	\$ 628.05	\$ -	\$ -	
4/1/2012		\$ 2,258.02	\$ -	REGULAR PAYMENT	4/1/2012	\$ 2,258.02	\$ 458.00	\$ 1,507.27	\$ 202.55	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 728.20	\$ -	\$ -	\$ (0.00)
5/1/2012	\$ 2,258.02		\$ 2,258.02	Monthly Mortgage Payment Due	5/1/2012	\$ 4,517.04						\$ 3,022.01	\$ -	\$ 728.20	\$ -	\$ -	
5/1/2012		\$ -	\$ -	REGULAR PAYMENT	5/1/2012	\$ 2,258.02	\$ 481.44	\$ 1,504.83	\$ 202.55	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 728.20	\$ -	\$ -	\$ (0.00)
6/1/2012	\$ 2,197.32		\$ -	OVERLAGE REFUND	5/1/2012	\$ 2,258.02			\$ (48.06)			\$ 3,022.01	\$ -	\$ 783.67	\$ -	\$ -	
6/1/2012		\$ 2,197.32	\$ -	Monthly Mortgage Payment Due	6/1/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 783.67	\$ -	\$ -	\$ (0.00)
6/1/2012		\$ 2,197.32	\$ -	REGULAR PAYMENT	6/1/2012	\$ 2,197.32	\$ 433.89	\$ 1,002.38	\$ 202.55	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 783.67	\$ -	\$ -	\$ (0.00)
7/1/2012	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	7/1/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 783.67	\$ -	\$ -	
7/1/2012		\$ 2,197.32	\$ 61.50	REGULAR PAYMENT	7/1/2012	\$ 2,197.32	\$ 466.35	\$ 1,502.92	\$ 141.05	\$ 61.50	\$ 0.00	\$ 3,022.01	\$ -	\$ 686.22	\$ -	\$ -	\$ (0.00)
8/1/2012	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	8/1/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 686.22	\$ -	\$ -	
8/1/2012		\$ 2,197.32	\$ 61.50	REGULAR PAYMENT	8/1/2012	\$ 2,197.32	\$ 468.83	\$ 1,507.44	\$ 141.05	\$ 61.50	\$ 0.00	\$ 3,022.01	\$ -	\$ 1,127.27	\$ -	\$ -	\$ (0.00)
9/1/2012	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	9/1/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 1,127.27	\$ -	\$ -	
9/1/2012		\$ 2,197.32	\$ -	REGULAR PAYMENT	9/1/2012	\$ 2,197.32	\$ 468.83	\$ 1,507.44	\$ 141.05	\$ 61.50	\$ 0.00	\$ 3,022.01	\$ -	\$ 1,268.32	\$ -	\$ -	\$ (0.00)
10/1/2012	\$ 2,197.32		\$ (0.50)	MISC ADJ	9/1/2012	\$ 2,197.32	\$ 471.32	\$ 1,584.05	\$ 141.05	\$ -	\$ 61.50	\$ 3,022.01	\$ -	\$ 1,409.37	\$ -	\$ -	\$ (0.50)
10/1/2012		\$ 2,197.32	\$ -	Monthly Mortgage Payment Due	10/1/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 1,409.37	\$ -	\$ -	
10/1/2012		\$ 2,197.32	\$ -	REGULAR PAYMENT	10/1/2012	\$ 2,197.32	\$ 473.83	\$ 1,507.41	\$ 141.05	\$ -	\$ 61.50	\$ 3,022.01	\$ -	\$ 1,550.42	\$ -	\$ -	\$ (0.00)
11/1/2012	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	11/1/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 1,550.42	\$ -	\$ -	
11/1/2012		\$ 2,197.32	\$ -	PAYMENT	11/1/2012	\$ 2,197.32	\$ 478.31	\$ 1,570.03	\$ 141.05	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 1,691.47	\$ -	\$ -	\$ (0.00)
12/4/2012	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	12/4/2012	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 1,691.47	\$ -	\$ -	
12/4/2012		\$ 2,197.32	\$ -	PAYMENT	12/4/2012	\$ 2,197.32	\$ 478.87	\$ 1,577.40	\$ 141.05	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 1,832.52	\$ -	\$ -	\$ (0.00)
1/3/2013	\$ 2,197.32		\$ 2,197.32	COUNTY TAX DEBURSED	12/1/2012	\$ 2,197.32			\$ (1,700.23)			\$ 3,022.01	\$ -	\$ 30.20	\$ -	\$ -	\$ (0.00)
1/3/2013		\$ 2,197.32	\$ -	Monthly Mortgage Payment Due	1/3/2013	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 30.20	\$ -	\$ -	
1/3/2013		\$ 2,197.32	\$ -	PAYMENT	1/3/2013	\$ 2,197.32	\$ 481.42	\$ 1,074.05	\$ 141.05	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 177.34	\$ -	\$ -	\$ (0.00)
2/1/2013	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	2/1/2013	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 177.34	\$ -	\$ -	
2/1/2013		\$ 2,197.32	\$ -	PAYMENT	2/1/2013	\$ 2,197.32	\$ 483.97	\$ 1,072.30	\$ 141.05	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 318.39	\$ -	\$ -	\$ (0.00)
3/1/2013	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	3/1/2013	\$ 4,394.64						\$ 3,022.01	\$ -	\$ 318.39	\$ -	\$ -	
3/1/2013		\$ 2,197.32	\$ -	PAYMENT	3/1/2013	\$ 2,197.32	\$ 486.55	\$ 1,509.72	\$ 141.05	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 458.44	\$ -	\$ -	\$ (0.00)
3/18/2013	\$ 2,205.98		\$ -	HAZARD SFR DISBURSED	3/1/2013	\$ 2,197.32			\$ (1,805.33)			\$ 3,022.01	\$ -	\$ 1,445.09	\$ -	\$ -	\$ (0.00)
4/1/2013	\$ 2,197.32		\$ 2,197.32	Monthly Mortgage Payment Due	4/1/2013	\$ 4,403.28						\$ 3,022.01	\$ -	\$ 1,445.09	\$ -	\$ -	
4/1/2013		\$ 2,197.32	\$ -	PAYMENT	4/1/2013	\$ 2,205.98	\$ 488.13	\$ 1,007.14	\$ 141.05	\$ -	\$ (0.00)	\$ 3,022.01	\$ -	\$ 1,304.64	\$ -	\$ -	\$ (0.00)
5/1/2013	\$ 2,205.98		\$ (0.04)	HAZARD SFR DISBURSED	4/1/2013	\$ 2,205.98			\$ (460.00)			\$ 3,022.01	\$ -	\$ 1,770.93	\$ -	\$ -	\$ (0.04)
5/1/2013		\$ (0.04)	\$ -	FORFEITANCE ADJ	4/1/2013	\$ 4,411.82						\$ 3,022.01	\$ -	\$ 1,770.93	\$ -	\$ -	\$ (0.04)
5/1/2013		\$ 2,205.98	\$ -	PAYMENT	5/1/2013	\$ 2,205.98	\$ 491.73	\$ 1,064.54	\$ 149.69	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 1,621.24	\$ -	\$ -	\$ (0.00)
6/1/2013	\$ 2,990.58		\$ 2,990.58	HAZARD SFR DISBURSED	5/1/2013	\$ 2,205.98			\$ (406.00)			\$ 3,022.01	\$ -	\$ 1,621.24	\$ -	\$ -	\$ (0.00)
6/1/2013		\$ (0.04)	\$ -	FORFEITANCE ADJ	5/1/2013	\$ 5,196.55						\$ 3,022.01	\$ -	\$ 2,087.33	\$ -	\$ -	\$ (0.04)
6/1/2013		\$ 2,990.58	\$ -	PAYMENT	6/1/2013	\$ 2,990.58	\$ 494.34	\$ 1,561.90	\$ 149.69	\$ -	\$ 0.00	\$ 3,022.01	\$ -	\$ 2,087.33	\$ -	\$ -	\$ (0.00)
7/1/2013	\$ 2,020.50		\$ 2,020.50	HAZARD SFR DISBURSED	6/1/2013	\$ 5,801.16			\$ (2,736.49)			\$ 3,022.01	\$ -	\$ 4,734.13	\$ -	\$ -	\$ (0.00)
7/1/2013		\$ 2,020.50	\$ -	Monthly Mortgage Payment Due	7/1/2013	\$ 5,801.16						\$ 3,022.01	\$ -	\$ 4,734.13	\$ -	\$ -	
7/2/2013		\$ 2,020.50	\$ -	PMT-FORBEAR SUCP	6/1/2013	\$ 5,801.16						\$ 3,022.01	\$ -	\$ 4,734.13	\$ -	\$ -	
8/1/2013	\$ 2,038.27		\$ -	Delinquent PM Payment Due	6/1/2013	\$ 8,037.43						\$ 3,022.01	\$ -	\$ 4,734.13	\$ -	\$ -	\$ (0.00)
8/2/2013		\$ (793.27)	\$ -	FORFEITANCE ADJ	6/1/2013	\$ 8,037.43						\$ 3,022.01	\$ -	\$ 4,734.13	\$ -	\$ -	\$ (793.27)
8/2/2013		\$ 2,990.50	\$ -	PAYMENT	7/1/2013	\$ 6,040.86	\$ 496.97	\$ 1,500.30	\$ 834.32	\$ -	\$ (0.00)	\$ 3,022.01	\$ -	\$ 3,709.81	\$ -	\$ -	\$ (0.00)
9/1/2013	\$ 2,038.27		\$ -	Delinquent PM Payment Due	7/1/2013	\$ 7,103.13						\$ 3,022.01	\$ -	\$ 3,709.81	\$ -	\$ -	\$ (0.00)

9

STATE OF SOUTH CAROLINA)
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COUNTY OF RICHLAND)
)
NATIONSTAR MORTGAGE, LLC)
d/b/a MR. COOPER,)
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Respondent,)
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vs.)
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BARBARA A. GIBBS, MELVIN E.)
GIBBS,)
Appellants.)
_____)

IN THE COURT OF APPEALS
OF SOUTH CAROLINA

RECEIVED

CASE No: 2019-000486

SEP 30 2021


SC Court of Appeals

CERTIFICATE OF SERVICE



I, Melvin E. Gibbs, hereby certify that a copy of Gibbs' Response to Respondent's Substitution of Counsel and Motion for Clarification: was placed with USPS, postage prepaid, the 26th day of August 2021, addressed to:

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