

August 5, 2024

Received, Clerk, Supreme Court

AUG 12 2024

To the Office of the
Clerk of Court, Supreme Court
of Florida
The Hon. John A. Tomasino
500 South Duval Street
Tallahassee, Fl. 32399-1927

Edith Renfroe,
Petitioner

-v-

Nationstar Mortgage, LLC
Et al
Respondent(s)

SC2024-1064
Lower Tribunal No(s):
5D23-1634
16-2014-CA-005062

The Hon. John A. Tomasino:

Petitioner , Edith Renfroe, *pro se* submits the following clarification regarding the above captioned case(s) and states as follows:

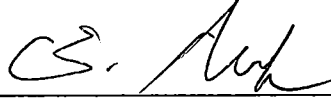
1. On July 18, 2024 Renfroe filed in the Fifth District Court of Appeal Notice to **Invoke Conflict Jurisdiction** (EXH.A); The Court docket erroneously reflected “Notice to Invoke Discretionary Jurisdiction;”
2. On July 18, 2024 Clerk of Court , Fifth District Court of Appeal submitted her Review to this Court, erroneously stating “Attached is a certified copy of the **notice Invoking Discretionary Jurisdiction...**” (EXH. B);

3. On July 22, 2024 this Court issued its Dismissal of Petitioner's Notice to **invoke Discretionary Jurisdiction** (EXH. C);
4. On July 23, 2024 Petitioner Renfroe furnished this Court her Request to Grant Conflict Jurisdiction -as properly filed on July 18, 2024, (EXH. D);
5. On July 29, 2024 Petitioner Renfroe addressed Madame Clerk in the 5th District Court of Appeal with her request to correct the Review, (EXH. E);
6. On August 2,2024 Clerk of Court of 5th District Court of Appeal forwarded a “ **Corrected Transmittal**”, (EXH. F);
7. This so-called Correction unconceivably though contained yet another error, namely the Request to Grant **Conflict Jurisdiction refers to case nr. 5D21-0201 Johnson v. Wal-Mart Stores East**, (EXH. G);
8. On August 5, 2024 Petitioner Renfroe telephonically contacted the Office of the Clerk of 5th District Court of Appeal with her repeated request to once and for all remedy and correct these erroneous transmissions. Petitioner was informed that the appropriate correction will be entered into the docket and the Florida Supreme Court will be properly notified. Hopefully !

WHEREFORE, Petitioner Renfroe herewith reiterates her Request to **Grant Conflict Jurisdiction**.

Dated: 08/11/2024

Respectfully submitted,



Edith Renfroe, *pro se*
8000 Quailwood Drive
Jacksonville, Fl. 32256
Tel.: (904) 629-6342
Erenfroe36@comcast.net

CERTIFICATE OF SERVICE

I HEREWITH CERTIFY that a true and correct copy has been furnished via U.S.Postal Service this 11th day of August 2024 to:

5DCA Clerk
Hon. Peter Dearing
Alec Peyton Hayes
Robertson Anschutz Schneid



EXHIBIT A

RECEIVED

JUL 18 2024

**IN THE DISTRICT COURT OF APPEAL
FOR THE FIFTH DISTRICT, STATE OF FLORIDA**

DISTRICT COURT OF APPEAL
FIFTH DISTRICT

EDITH RENFROE

Appellant

Case no: 2023-1634

-v-

NATIONSTAR MORTGAGE LLC
AND DEERWOOD IMPROVEMENT
ASSOCIATION, Inc.

Appellees

**APPELLANT'S NOTICE OF INTENT TO INVOKE
CONFLICT JURISDICTION OF THE SUPREME COURT OF
FLORIDA**

Appellant, Edith Renfroe, *pro se* pursuant to Fla. R. App. P. 9.120 and 9.030(a)(2)(iv), invokes the Conflict Jurisdiction of the Supreme Court of Florida to review the decision of this Court originally issued 05/14/2024 and rendered 07/10/2024. The basis for jurisdiction is that this Court's decision expressly and directly conflicts with prior appellate court decisions together with its own prior decisions on the same question of law.

Dated: 7/18/2024

Respectfully submitted,



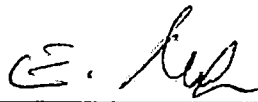
Edith Renfroe, *pro se*
8000 Quailwood Drive
Jacksonville, Fl. 32256
Tel.: (904) 629-6342
Erenfroe36@comcast.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a true and correct copy of the foregoing has been furnished via U.S.Postal service this 18th Day of July 2024 to:

Troutman Pepper Hamilton, Sanders
600 Peachtree Street, N.E. # 3000
Atlanta, ga. 30308-2216

Dated: 7/18/2024



Edith Renfroe, *pro se*

EXHIBIT B

JAMES A. EDWARDS
CHIEF JUDGE

SCOTT MAKAR
F. RAND WALLIS
BRIAN D. LAMBERT
HARVEY L. JAY
ERIC J. EISNAUGLE
JOHN M. HARRIS
ADRIAN G. SOUD
JOE BOATWRIGHT
PAIGE KILBANE
JOHN MACIVER
JORDAN E. PRATT

JUDGES



DISTRICT COURT OF APPEAL
FIFTH DISTRICT
300 SOUTH BEACH STREET
DAYTONA BEACH, FLORIDA 32114
(386) 947-1500 COURT

SANDRA B. WILLIAMS
CLERK

SHEILA N. STANBRO
CHIEF DEPUTY CLERK

AARON R. SOLTZ
MARSHAL

JUSTINE HORLER
CHIEF DEPUTY MARSHAL

SHARON SERRA
DIRECTOR OF CENTRAL STAFF

July 18, 2024

Hon. John A. Tomasino, Clerk
Supreme Court of Florida
500 South Duval Street
Tallahassee, Florida 32399-1927

Re: RENFROE
v.
NATIONSTAR MORTGAGE LLC
& DEERWOOD IMPROVEMENT

Appeal No. 5D23-1634
Trial Court No: 2014-CA-006052
Trial Court Judge: HON. PETER L. DEARING

Dear Hon. Tomasino:

Attached is a certified copy of the Notice Invoking the Discretionary Jurisdiction of the Supreme Court pursuant to Rule 9.120, Florida Rules of Appellate Procedure, along with a copy of this Court's opinion or decision relevant to this case.

- The filing fee prescribed by Section 25.241(3), Florida Statutes, was received by this court and will be forwarded.
- The filing fee prescribed by Section 25.241(3), Florida Statutes, was not received by this Court.
- Petitioner/Appellant has been previously determined insolvent by this Circuit Court or our court.

No filing fee is required because:

- Summary Appeal (Rule 9.141)
- Unemployment Appeals Commission
- Habeas Corpus
- Juvenile case
- Other- Petition

Sincerely,
SANDRA B. WILLIAMS, CLERK
By: /s/ Kathy Palmere
Deputy Clerk

Attachments

CC: Edith Renfro, Alec Peyton Hayes, John A. Tomasino

EXHIBIT C

Supreme Court of Florida

MONDAY, JULY 22, 2024

Edith Renfroe,

Petitioner(s)

v.

Nationstar Mortgage, LLC et
al,

Respondent(s)

SC2024-1064

Lower Tribunal No(s):

5D2023-1634;

162014CA006052XXXXMA

Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the 5th District Court of Appeal on May 14, 2024, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. *See Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

No motion for rehearing or reinstatement will be entertained by the Court.

A True Copy

Test:

SC2024-1064 7/22/2024

John A. Tomasino

Clerk, Supreme Court

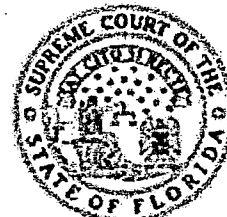


EXHIBIT D

July 23, 2024

Edith Renfroe

Petitioner

SC2024-1064

Lower Tribunal Nr. 5D23-1634

Trial Court No.: 16-2014-CA-006052

THE HON. PETER L. DEARING

Senior Judge

v.

Nationstar Mortgage , LLC et
et al

Respondent(s)

PETITIONER RENFROE'S REQUEST TO GRANT CONFLICT JURISDICTION

COMES NOW, Edith Renfroe, *pro se* respectfully asking the Hon. John A. Tomasino for GRANTING CONFLICT JURISDICTION and states as follows:

1. On July 18, 2024, Respondent filed her **Notice of Intent to Invoke Conflict Jurisdiction of the Supreme Court of Florida in the Fifth District Court of Appeal.** (EXH.A);

2. The basis for conflict jurisdiction is that the Court's decision expressly and directly conflicts with prior appellate courts decision together with its own prior decision on the same question of law,(EXH. B);

3. It was well settled that PCA's without opinion were not considered reviewable absent exceptional circumstances as they neither announce a point of law nor have sufficient precedential value to raise the constitutionally required direct conflict;

4. In 1965, however, the issue was reconsidered in *Foley v. Weaver Drugs, Inc.*, 168 So. 2d 749 (Fl. 1965). The *Foley* court held that " this court may review by conflict certiorari a per curiam judgment of affirmance without opinion where an examination of the record proper discloses that the legal effect of such per curiam affirmance is to create conflict with a decision of this court or another district court of appeal. The court defined record proper

without citing precedent as “ written record of the proceedings in the court under review except the report of the testimony.”

The court reversed its position and held that PCA’s without opinion have the same ability to raise **conflict** as decisions with full opinions and were thus constitutionally reviewable where an examination of the “ record proper” disclosed a conflict. Justice O’Connell: “Now, however, a majority of this Court in *Foley v. Weaver Drugs, Inc.* Fla. 1965, 168 So. 2d 749, have held that this Court does have jurisdiction to review such a per curiam decision without opinion under the conditions detailed therein. I am bound by this decision of a majority of this Court and compelled to follow it.”

5. Article V uses the word “ direct conflict” (as is applicable to the case at bar) to manifest a concern with decisions as precedents as opposed to adjudications of the rights of particular litigants.

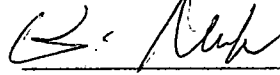
6. The issuance of a PCA is a departure from the essential elements of law and particularly when it conflicts with decisions from sister courts throughout Florida but is in conflict with its own previous decisions.. Since the instant PCA does not speak to any of the issues and conflicts raised in the lower court and on appeal,(on record proper) there is due process violation in addition to violation of the most recent U.S.Supreme Court ruling in *SEC v. Jarkesy*, 22-859. June 27, 2024.

7. Without the possibility of certiorari review of district court per curiam decisions without opinion would keep the court from fulfilling its

Duty, as the “ supervisory body in the judicial system” of this state. *Ansin v. Thurston*, Fla. 1958, 101 So. 2d 808, 810 to maintain uniformity and harmony in the decisions of our Appellate courts, and to resolve the conflict created by a decision which is, “ out of harmony with a prior decision of this Court or another Court of Appeal on the same point, thereby generating confusion and instability among the precedents.” *Kyle v. Kyle*, Fla. 1962, 139 So. 2d 885,887.

Petitioner is not seeking to enter motion for rehearing or reinstatement – on a “Discretionary Jurisdiction” which she did not seek, but rather is asking for consideration to grant review on her Notice of Intent to Invoke **Conflict Jurisdiction** as filed on July 18, 2024 in the Fifth District Court of Appeal.

Respectfully submitted,



Edith Renfroe, *pro se*
8000 Quailwood Drive
Jacksonville, Fl. 32256
Tel.: (904) 629-6342
Erenfroe36@comcast.net

Copy served to:

5DCA CLERK
DUVAL CLERK
HON. PETER L. DEARING
ALEC PEYTON HAYES
COLBY L KEEFE
KIM STVENS
ALBERT A. ZAKARIAN
ROBERTSON, ANSCHUTZ & SCHNEID

EXHIBIT A

**IN THE DISTRICT COURT OF APPEAL
FOR THE FIFTH DISTRICT, STATE OF FLORIDA**

EDITH RENFROE

Appellant

Case no: 2023-1634

-v-

NATIONSTAR MORTGAGE LLC
AND DEERWOOD IMPROVEMENT
ASSOCIATION, Inc.

Appellees

**APPELLANT'S NOTICE OF INTENT TO INVOKE
CONFLICT JURISDICTION OF THE SUPREME COURT OF
FLORIDA**

Appellant, Edith Renfro, *pro se* pursuant to Fla. R. App. P. 9.120 and 9.030(a)(2)(iv), invokes the Conflict Jurisdiction of the Supreme Court of Florida to review the decision of this Court originally issued 05/14/2024 and rendered 07/10/2024. The basis for jurisdiction is that this Court's decision expressly and directly conflicts with prior appellate court decisions together with its own prior decisions on the same question of law.

Dated: 7/18/24

Respectfully submitted,



Edith Renfroe, *pro se*
8000 Quailwood Drive
Jacksonville, Fl. 32256
Tel.: (904) 629-6342
Erenfroe36@comcast.net

CERTIFICATE OF SERVICE

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Troutman Pepper Hamilton, Sanders
600 Peachtree Street, N.E. # 3000
Atlanta, ga. 30308-2216

Dated: 7/18/24



Edith Renfroe, *pro se*

EXHIBIT B

**IN THE FIFTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA**

Case Nr.: 5D23-1634

Lt. Case Nr. 16-2014-CA-006052

EDITH RENFROE

Appellant

-v-

**NATIONSTAR MORTGAGE LLC
d/b/a MR.COOPER**

Appellee

**APPELLANT's REPLY AND RESPONSE TO
APPELLEE's OPPOSITION TO APPELLANT's MOTION FOR
WRITTEN OPINION, REHEARING , AND RHEARING EN BANC**

Edith Renfroe, *pro se*
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Jacksonville, Fl. 32256
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Erenfroe36@comcast.net

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REFUTING MR. HAYES' INTRODUCTION

Appellant, Edith Renfroe, respectfully disagrees with Nationstar's legal representative, Alec Hayes' description of the case. It may be true that Mr. Hayes, is a legal expert of great experience (per self description), however, he is a late comer to this 10 year long tortured litigation and has only scant to no knowledge of the facts surrounding Nationstar's illegal and relentless barrage and attacks Renfroe endured throughout these many years. Mr. Hayes working for the law firm of TROUTMAN PEPPER HAMILTON SANDERS, Atlanta, Ga. is

attorney Nr. 18 in the long line of legal counsels appearing for Nationstar presenting prevarication and spin failing to comply with the requirements for an accurate and supported recitation.

Renfroe strictly rejects his unwarranted comment that Renfroe “abuses the judicial system,” suggesting that Appellant has no right to defend herself against Nationstar’s unwarranted and illegal allegations.

Mr. Hayes has failed to explain:

- (a) that his client in its ambush complaint filed by the law firm of ROBERTSON ANSCHUTZ SCHNEID & CRANE, Boca Raton, Fl never referred to Fl.St. 673.3011 under Fl.R.C.P. 702.015(2)(b) “**allege with specificity the actual basis by which the plaintiff is a person entitled to enforce the note under 673.3011 and thus has no standing;**
- (b) that his client produced a note copy that neither showed Appellant’s proper signature nor showed initials that had been affixed on every page;
- (c) that his client failed to comply with condition precedent under par. 22 which is a condition precedent to filing suit *see Michael J. Parkin Jr. v. Eagle Home Mortgage, LLC*, 5D20-160 (March 5, 2021),
- (d) that his client never suffered any concrete injury or harm and never had a legitimate claim; *see TransUnion v. Ramirez*, 594US_(2021) Justice Cavanaugh “.. does not relieve courts of their responsibility to independently decide whether a plaintiff has suffered a concrete harm under Article III.” And “.. an injury in law

is not an injury in fact,...no concrete harm , no standing.” The Supreme Court’s decision punctuates that a concrete harm is *essential* to establishing an injury in fact for Article III standing. I invite Mr. Hayes to contradict the Supreme Court decision,
(e) that his client is holding a void judgment :

- i) judgment was procured by fraud upon the court,
- ii) trial court lost subject matter jurisdiction acting in a manner inconsistent with the law , 15 U.S.C. 1692-1692p FDCPA;
- iii) trial court lost subject matter inconsistent with due process in violation of the Fourteenth Amendment and Property Owner Bill of Rights, Fed. R.C.P., Rule 60(b)(4); 28 U.S.C.A. Const Amendment 5, *Klugh v. U.S.* 620 F. Supp. 892 (D.S.C. 1985) and Fla. St. 70.001 denying Renfroe a fair trial. Such judgment may be set aside at any time. *Palmer v. Palmer*, 479 So. 2d 22 (Fla. 5DCA 1985);
see Won Yang Sung v. McGrath , 339 U.S.33, 1950 , the Court held that when the U.S. Constitution requires a hearing it must be fair and held before a tribunal that meets current standards of impartiality “....a hearing in front of a tribunal that does not meet the impartiality standards of the APA might violate due process..”;
Duncan v. Louisiana, 391 US 145, 1968, Justice John Harlan described “ due process as fundamental fairness.”
- (iv) trial court acted as witness for Nationstar but was not witness listed;

The laws covering judges and other public officials are to be found at 5 U.S.C. 3331,28, U.S.C. 543 and 42 U.S.C. 1983 and if the judge has not complied with all of those provisions he is not a judge but a trespasser upon the court and none of his judgments are Valid. **They all are void;**

It is Appellant's constitutional right to defend herself from continuous persecution carried out by a party that never suffered any concrete harm or injury who never extended credit to Appellant, and who never filed any authority in any jurisdiction documenting that it is authorized to litigate for a third party.

Nationstar a licensenced debt collector agency (License nr. 2066076 and 1401585) never owned the mortgage. It is well settled before foreclosing on a home, Plaintiff must **prove it actually owns the mortgage.**

Counsel's " Introduction" is absurd logically and constitutionally and should be disregarded in its entirety.

APPELLAN'S REPLY ARGUMENT

The plain language of Appellant Renfroe's Motion in Statement of Case and Facts as shown below

I. A WRITTEN OPINION IS REQUIRED;

II. REQUEST FOR REHEARING/REHEARING EN BANC

is supported by Rule 9.331, section 701(1), Subsection (c)(1) and under the Constitution of the State of Florida, Section 3(4) and (5).

1. **A WRITTEN OPINION IS REQUIRED** when

“ a party believes that a written opinion would provide a legitimate basis for Supreme Court review. The motion for Written Opinion is appropriate when a PCA conflicts with an Opinion from the Supreme Court or another district court because the **Supreme Court could exercise its non-conflict jurisdiction** under Fla. Constitution Art. V, section 3(b)(3).

Article V, section 3(b)(3) of the Florida Constitution grants the Supreme court jurisdiction to review any decision of a district court of appeal that is in direct conflict with a decision of any other district court of appeal or of the supreme court on the same question of law.

The Supreme Court may review any decision of a district court of appeal that passes upon a question to be great public importance, or that is certified by it to be in direct conflict with a decision of another district court of appeal. It may review any order or a

another district court of appeal. It may review any order or a judgment of a trial court certified by the district court of appeal in which an appeal is pending to be of great public importance, or to have a great effect on the **proper administration of justice** throughout the state, and certified to require immediate resolution by the supreme court. (Constitution of the State of Florida, Section Three (5).

It is proven and irrefutable fact that Nationstar at no time provided the required Notice under par. 22 of the Mortgage. **A Notice of Default is a Public record registered with the local property records office**, which has to be sent 30 days prior to instituting any lawsuit and is a condition precedent to file such suit. In the instant case, Nationstar **at no time furnished such document or registered the Notice in any jurisdiction, did not append it to its ambush lawsuit, did not enter it as trial exhibit - simply because it never existed.**

“ If the trial court and this Court of Appeal thoroughly examined the facts...” as Mr. Hayes claims, why is it that said Notice was never discovered or presented to court. It remains elusive to this day because **it never existed. Supreme Court review is of great public importance due to conflicts with the following rulings of sister courts in cases of non-compliance with condition precedent under par. 22** such as:

a) **FIRST DISTRICT COURT OF APPEAL**

Harper v. HSBC Bank, USA, National Association,
148 So. 3d 1285, 2014;

The Race Inc., v. Lake & River Recreational Properties,
573 So. 409, 1991;

Thomas v. Ocwen Loan Servicing LLC,
84 So. 3d 1246, 2012

b) **SECOND DISTRICT COURT OF APPEAL**

U.S. Bank National Association v. Busquets,
135 So. 3d 488, 491, 2014;

Laurencio v. Deutsche Bank National Trust Co.,
65 So. Ed 1190, 1195, 2011;

Edmonds v. U.S. Bank National Ass'n,
215 So. 3d 628 , 629-639, 2017;

DiSalvo v. Sun Trust Mortg. Inc.
115 So. 3d 438, 439-41, 2013;

Young v. Nationstar Mortgage LLC,
2DCA 15-1023, 2016;

Amstone v. Bank of N.Y. Mellon,
182 So. 3d 804, 806, 2015;

Cerron v. GMAV Mortgage LLC,
93 So. 3d 456, 2012;

Bryson v. Branch Banking and Trust Co.,
75 So. 3d 783, 2011;

Taylor V. Bayview Loan servicing, LLC,
74 So. 3d 1115, 2011;

Zervas v. Wells Fargo Bank, N.A.,
93 So. 3d 453, 2012;

Olivers v. Bank of America, N.A.,
2D13-629, July 2014;

Perez v. Deutsche Bank National Trust Company , as Trustee for JP
Morgan Mortgage Acquisition Trust 2006-CH\$,
2D17-1043;

Allen v. Wilmington Trust, N.A.
216 So. 3d 685-88 (Fla. 2DCA 2017);

Kamin v. Federal National Mortgage Association
2D16-2457, October 20, 2017;

Boye v. Citimortgage n/k/a Nationstar Mortgage LLC,
2D11-2604, Nay 23, 2012;

Spencer v. Ditech Financial
2D16-4817, April 4, 2018;

Judy v. MSM Venture LLC
2D11-1896, November 28, 2012;

Konsulian v. Busey Bank
2D10-2163, June 1, 2011;

Bryson v. Branch Banking & trust Company
2D10-3360, November 2011;

c) THIRD DISTRICT COURT OF APPEAL

Kelsey v. Sun Trust Mortgage, Inc.,
131 So. 3d 825, 826, 2014;

d) FOURTH DISTRICT COURT OF APPEAL

Bifulco v. State Farm Mutual Auto Ins. Co.,
693 So. 2d 797, 709, 1997;

Dominko v. Wells Fargo Bank, N.A.
102 So. 3d 698, 2012;

Brooks v. Bank of America, N.A.
4D14-3337, May 25, 2016;

Frost v. Regions Bank
15 So. 3d 905, 906-06 (Fla. 4DCA 2009);

Lazuran v. Citimortgag, Inc.,
35 So. 3d 189, 2010;

Finnegan v. Deutsche Bank Nat. Trust Co.
4D11-939, 2012;

Kurian v. Wells Fargo Bank, Nat'l. Ass'n.
38 Fla. L. weekly D 804, 2013;

Serrano v. HSBC Bank USA, Nat. Ass'n
107 So. 3d 527, 2013;

Foerster v. Regent Bank,
110 So. 3d 526, 2013;

Renaldo v. Deutsche Bank National Trust
4D17-2727, October 31, 2018;

Blum v. Deutsche Bank Trust Company, Americas as Trustee et al
4D14-4271, March 4, 2015;

Seale v. Regions Bank
4D12-3869, September 11, 2013;

Russell v. The Bank of New York Mellon
4D17-3944, February 6, 2019;

Southwart v. Bank of New York
4D14-3462, November 16, 2016;

Ensler v. Aurora Loan Services, LLC
4D14-351, October 28, 2015;

Miller v. Bank of New York Mellon, CWMBMS CHL 2006 FSB II
4D15-36, March 02, 2016;

Schindler v. Bank of New York Mellon Trust Company Natl. Ass'n
4D13-4825, April 8, 2015;

Torres v. Deutsche Bank National Trust Co
256 So. 3d 903, 905 (Fla. 4DCA 2018);

Holt v. Calchas, LLC
155 So. 3d 499 (Fla. 4DCA 2015);

Alessi v. Ocwen Loan servicing, LLC
4D18-793, May 1, 2019;

Gomez v. American Sav. And Loan Ass'n
515 So. 2d 301 (Fla. 3DCA October 28, 1987);

Torres v. Deutsche Bank National Trust Co
256 So. 3d 903, 905 (Fl. 4DCA 2018);

e) **FIFTH DISTRICT COURT OF APPEAL'S OWN CONFLICTING
RULINGS**

Colon v. JP Morgan Chase Bank
So. 3d 195, 2015;

Samaro v. Wells Fargo Bank
137 So. 3d 1127, 2014;

Wroblewski v. American home Mortgage Servicing, Inc.,
68So. 3d 431, 2011;

Morrison v. U.S.Bank N.A.
66 So. 3d 387, 388, 2011

Vitaliy v. Wells Fargo Bank, N.A.
5D17-1904, September 28, 2018;

Madl v. Wells Fargo Bank
244 So. 3d 1134, 5D 16-53, May 18, 2018;

Haberl v. 21st Mortgage Corporation
5D12-4839, 5DCA May 23, 2014;

Colon v. JP Morgan Chase Bank, N.A. et al
5D14-1191, February 6, 2015;

Galloway v. Suntrust Bank
5D14-2878, February 24, 2017;

Palma v. JP Morgan Chase
5D15-3358, December 2, 2016;

Turan v. Nationstar LLC
5D17-215, April 27, 2018;

Michael J. Parkin Jr v. Eagle Home Mortgage LLC
5D20-160, 312 So. 3d 1034 (March 5, 2021).

Turan v. Nationstar LLC
5D17-215, April 27, 2018;

Michael J. Parkin Jr. v. Eagle Home Mortgage, LLC
5D20-160, 312 So. 3d 1034 (March 5, 2021);

2. **EN BANC HEARING IS NECESSARY TO MAINTAIN
UNIFORMITY IN THE COURT'S DECISION**

Pursuant to Rule 9.331 , 701(1) Appellant in her Motion for Written Opinion, Hearing / Hearing en banc has shown that proper grounds for Rehearing en banc are met.

Pursuant to Rule 9.331, Subsection (c)(1) Appellant has applied for Hearing en banc on the ground that an intradistrict conflict of decisions exists.

The United States government was devised to protect the natural rights of all, including rights of *pro se* litigants. Justice is the end of government. It is the end of civil society. It ever had been and ever will be pursued until it be obtained, *or until liberty be lost in the pursuit* (James Madison). Judges are limited by prior case law and by congressional statutes (par. 22). Appellant has been through a 10 year long systematic harassment and abuse by Nationstar, a total stranger to the mortgage who is using the court system to harvest its undue enrichment priding itself that it enjoys "**extraordinary bench strenght...**". Litigation is a battlefield which often hosts parties in unequal position where courts for the most part ignore the rules of evidence to benefit the wealthy favoring the courtesan legal cabals as presented by Nationstar who blatantly makes fraudulent assertions and using forged documents, in its quest to take people's homes without paying one dime for it. Servicer Nationstar has a long and checkered history of unfair and deceptive acts violating servicer laws and consumer protection laws and was a Defendant in a monumental lawsuit brought against it by 50 Attorney Generals and the CFPB in the United States District Court for the District of Columbia, case nr. 1:20-cv-3551, 12/07/2020
After paying \$ 86,346,353.00 for the Consent Judgment Nationstar

continued where it left off. Attorney Toni Townsend from the law firm of McCALLA RAYMER LEIBERT PIERCE, Roswell, Ga, on December 21, 2020 filed fraudulent POC in Appellant's bankruptcy case which was promptly discharged under 11.U.S.C. 727 by the presiding federal bankruptcy judge.

CONCLUSION

For the reasons stated herein, Appellant respectfully requests this Court grant Appellant's request for issuance of Written Opinion, Hearing and Hearing en banc and deny Appellee's Opposition to Appellant's Motion.

Dated 06/27/2024

Respectfully submitted,



Edith Renfroe, *pro se*
8000 Quailwood Drive
Jacksonville, FL 32256
Tel.:(904) 629-6342
Erenfroe36@comcast.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a true and correct copy of the foregoing has been furnished via U.S.Postal Service this ____ day of June 2024 to:

Alec Hayes, Atty for Nationstar
Troutman Pepper Hamilton Sanders
600 Peachtree Street N.E., # 3000
Atlanta, Ga. 30308-2216

CERTIFICATE OF FONT COMPLIANCE

I HEREBY CERTIFY, that this document complies with the requirements of Fl.R. App. P. 9.210 and 9.045(b) and is created using Bookman Old Style 14-point font.

Dated: 06/17/2009

A handwritten signature in cursive script, appearing to read "E. Renfroe", is written over a horizontal line.

Edith Renfroe, *pro se*

EXHIBIT E

MEMORANDUM

**TO: MADAME CLERK OF THE FIFTH DISTRICT COURT OF
APPEAL**

FROM: EDITH RENFROE, PRO SE

RE: CASE NR. 2023-1634
RENFROE v. NATIONSTAR MORTGAGE LLC, d/b/a
MR. COOPER

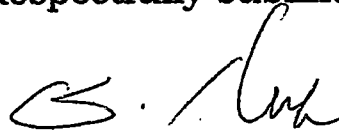
Please re-open and enter the following correction to the record of case 2023-1634

- 1. RENFROE'S REQUEST TO GRANT CONFLICT JURISDICTION
IN THE FLORIDA SUPREME COURT;**
- 2. IN YOUR LETTER OF REVIEW TO THE FLORIDA SUPREME
COURT ON THE ATTACHED COPY OF NOTICE IT IS STATED
"INVOKING THE DISCRETIONARY JURISDICTION.."
PLEASE CORRECT AS I DID NOT INVOKE DISCRETIONARY
JURISDICTION; SEE: COPY ATTACHED;**
- 3. I HAVE FORWARDED TO THE HON. JOHN TOMASINO A
COPY OF MY NOTICE TO INVOKE CONFLICT
JURISDICTION AS FILED IN THE FIFTH DISTRICT COURT
OF APPEAL ON JULY 18, 2024 SEE: COPY ATTACHED.**

Thank you very much.

Date: 7/29/2024

Respectfully submitted



Edith Renfroe, pro se
8000 Quailwood Drive
Jacksonville, Fl. 32256
Tel.: (904) 629-6342
Erenfroe36@comcast.net

EXHIBIT F

JAMES A. EDWARDS
CHIEF JUDGE

SCOTT MAKAR
F. RAND WALLIS
BRIAN D. LAMBERT
HARVEY L. JAY
ERIC J. EISNAUGLE
JOHN M. HARRIS
ADRIAN G. SOUD
JOE BOATWRIGHT
PAIGE KILBANE
JOHN MACIVER
JORDAN E. PRATT

JUDGES



DISTRICT COURT OF APPEAL
FIFTH DISTRICT
300 SOUTH BEACH STREET
DAYTONA BEACH, FLORIDA 32114
(386) 947-1500 COURT

SANDRA B. WILLIAMS
CLERK

SHEILA N. STANBRO
CHIEF DEPUTY CLERK

AARON R. SOLTZ
MARSHAL

JUSTINE HORLER
CHIEF DEPUTY MARSHAL

SHARON SERRA
DIRECTOR OF CENTRAL STAFF

August 2, 2024

CORRECTED TRANSMITTAL

Hon. John A. Tomasino, Clerk
Supreme Court of Florida
500 South Duval Street
Tallahassee, Florida 32399-1927

Re: JOHNSON
v.
WAL-MART STORES EAST

Appeal No. 5D23-0201
Trial Court No: 2019-CA-0446
Trial Court Judge: HON. ERIC C. ROBERSON

Dear Hon. Tomasino:

Attached is a certified copy of the **Request to Grant Conflict Jurisdiction in the Florida Supreme Court** pursuant to Rule 9.120, Florida Rules of Appellate Procedure, along with a copy of this Court's opinion or decision relevant to this case.

- The filing fee prescribed by Section 25.241(3), Florida Statutes, was received by this court and will be forwarded.
- The filing fee prescribed by Section 25.241(3), Florida Statutes, was not received by this Court.
- Petitioner/Appellant has been previously determined insolvent by this Circuit Court or our court.

No filing fee is required because:

- Summary Appeal (Rule 9.141)
- Unemployment Appeals Commission
- Habeas Corpus
- Juvenile case
- Other- Petition

Sincerely,
SANDRA B. WILLIAMS, CLERK
By: /s/ Kathy Palmere
Deputy Clerk

Attachments
CC: Edith Renfro, Alec Peyton Hayes, John A. Tomasino

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Edith Renfroe a/k/a Edith Steurer
Renfroe,

Case No.: 5D2023-1634
L.T. No.: 2014-CA-006052

Appellant(s)

v.

Nationstar Mortgage, LLC and
Deerwood Improvement Association,
Inc.,

Appellee(s).

Date: June 11, 2024

BY ORDER OF THE COURT:

ORDERED that Appellant's Motion for Issuance of a Written Opinion,
Rehearing and for Rehearing En Banc, filed May 23, 2024, is denied.

*I hereby certify that the foregoing is
(a true copy of) the original Court order.*

5D2023-1634 6/11/2024

SANDRA B. WILLIAMS, CLERK



Panel: Judges Makar, Eisnaugle and Pratt

cc:

Alec Peyton Hayes
Colby Keefe
Edith Renfroe
Robertson, Anschutz & Schneid
Kim Stevens
Albert A. Zakarian

**FIFTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA**

**Case No. 5D2023-1634
LT Case No. 2014-CA-006052**

**EDITH RENFROE a/k/a Edith
Steurer Renfroe,**

Appellant,

v.

**NATIONSTAR MORTGAGE, LLC
and DEERWOOD IMPROVEMENT
ASSOCIATION, INC.,**

Appellees.

**Nonfinal appeal from the Circuit Court for Duval County.
Peter L. Dearing, Judge.**

Edith Renfroe, Jacksonville, pro se.

**Albert A. Zakarian, of Troutman Pepper Hamilton Sanders LLP,
Atlanta, GA, for Appellee, Nationstar Mortgage, LLC.**

No Appearance for Remaining Appellee.

May 14, 2014

PER CURIAM:

FIFTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA

Case No. 5D2023-1634
LT Case No. 2014-CA-006052

EDITH RENFROE a/k/a Edith
Steurer Renfroe,

Appellant,

v.

NATIONSTAR MORTGAGE, LLC
and DEERWOOD IMPROVEMENT
ASSOCIATION, INC.,

Appellees.

Nonfinal appeal from the Circuit Court for Duval County.
Peter L. Dearing, Judge.

Edith Renfroe, Jacksonville, pro se.

Albert A. Zakarian, of Troutman Pepper Hamilton Sanders LLP,
Atlanta, GA, for Appellee, Nationstar Mortgage, LLC.

No Appearance for Remaining Appellee.

May 14, 2014

PER CURIAM.

AFFIRMED.

MAKAR, EISNAUGLE, and PRATT, JJ., concur.

*Not final until disposition of any timely and
authorized motion under Fla. R. App. P. 9.330 or
9.331.*

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Edith Renfroe a/k/a Edith Steurer
Renfroe,

Case No.: 5D2023-1634
L.T. No.: 2014-CA-006052

Appellant(s)

v.

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Appellee(s).

Date: June 11, 2024

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*I hereby certify that the foregoing is
(a true copy of) the original Court order.*

5D2023-1634 6/11/2024

Sandra B. Williams
SANDRA B. WILLIAMS, CLERK



Panel: Judges Makar, Eisnaugle and Pratt

cc:

Alec Peyton Hayes
Colby Keefe
Edith Renfroe
Robertson, Anschutz & Schneid
Kim Stevens
Albert A. Zakarian

M A N D A T E

FROM

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA

FIFTH DISTRICT

THIS CAUSE HAVING BEEN BROUGHT TO THIS COURT BY APPEAL OR BY PETITION, AND AFTER DUE CONSIDERATION THE COURT HAVING ISSUED ITS OPINION OR DECISION;

YOU ARE HEREBY COMMANDED THAT FURTHER PROCEEDINGS AS MAY BE REQUIRED BE HAD IN SAID CAUSE IN ACCORDANCE WITH THE RULING OF THIS COURT AND WITH THE RULES OF PROCEDURE AND LAWS OF THE STATE OF FLORIDA.

WITNESS THE HONORABLE JAMES A. EDWARDS, CHIEF JUDGE OF THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FIFTH DISTRICT, AND THE SEAL OF THE SAID COURT AT DAYTONA BEACH, FLORIDA ON THIS DAY.

DATE: July 10, 2024

FIFTH DCA CASE NO.: 5D2023-1634

CASE STYLE: Edith Renfroe a/k/a Edith Steurer Renfroe v. Nationstar Mortgage, LLC and Deerwood Improvement Association, Inc.

COUNTY OF ORIGIN: Duval County

TRIAL COURT CASE NO.: 2014-CA-006052

**I hereby certify that the foregoing is
(a true copy of) the original Court mandate.**

5D2023-1634-7110-02A
SANDRA B. WILLIAMS, CLERK



cc:

**Circuit Court Duval
Alec Peyton Hayes
Colby Keefe
Edith Renfroe**

**Robertson, Anschutz & Schneid
Kim Stevens
Albert A. Zakarian**

AFFIRMED.

MAKAR, EISNAUGLE, and PRATT, JJ., concur.

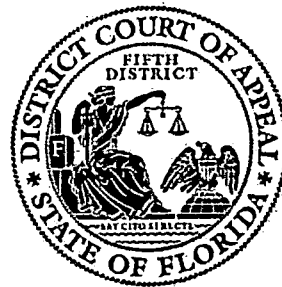
***Not final until disposition of any timely and
authorized motion under Fla. R. App. P. 9.330 or
9.331.***

5DCA CERTIFICATION

I hereby certify that the foregoing is a true and correct copy of the instrument(s) filed in this office.

Witness my hand and official seal this July 18, 2024 .

Sandra B. Williams, Clerk of the Fifth District Court of Appeal.



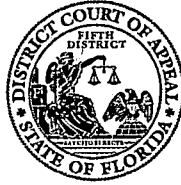
By: /s/ Kathy Palmere

EXHIBIT G

JAMES A. EDWARDS
CHIEF JUDGE

SCOTT MAKAR
F. RAND WALLIS
BRIAN D. LAMBERT
HARVEY L. JAY
ERIC J. EISNAUGLE
JOHN M. HARRIS
ADRIAN G. SOUD
JOE BOATWRIGHT
PAIGE KILBANE
JOHN MACIVER
JORDAN E. PRATT

JUDGES



DISTRICT COURT OF APPEAL
FIFTH DISTRICT
300 SOUTH BEACH STREET
DAYTONA BEACH, FLORIDA 32114
(386) 947-1500 COURT

SANDRA B. WILLIAMS
CLERK

SHEILA N. STANBRO
CHIEF DEPUTY CLERK

AARON R. SOLTZ
MARSHAL

JUSTINE HORLER
CHIEF DEPUTY MARSHAL

SHARON SERRA
DIRECTOR OF CENTRAL STAFF

August 2, 2024

CORRECTED TRANSMITTAL

Hon. John A. Tomasino, Clerk
Supreme Court of Florida
500 South Duval Street
Tallahassee, Florida 32399-1927

Re: JOHNSON
v.
WAL-MART STORES EAST

Appeal No. 5D23-0201
Trial Court No: 2019-CA-0446
Trial Court Judge: HON. ERIC C. ROBERSON

Dear Hon. Tomasino:

Attached is a certified copy of the Request to Grant Conflict Jurisdiction in the Florida Supreme Court pursuant to Rule 9.120, Florida Rules of Appellate Procedure, along with a copy of this Court's opinion or decision relevant to this case.

- The filing fee prescribed by Section 25.241(3), Florida Statutes, was received by this court and will be forwarded.
- The filing fee prescribed by Section 25.241(3), Florida Statutes, was not received by this Court.
- Petitioner/Appellant has been previously determined insolvent by this Circuit Court or our court.

No filing fee is required because:

- Summary Appeal (Rule 9.141)
- Unemployment Appeals Commission
- Habeas Corpus
- Juvenile case
- Other- Petition

Sincerely,
SANDRA B. WILLIAMS, CLERK
By: /s/ Kathy Palmere
Deputy Clerk

Attachments
CC: Edith Renfro, Alec Peyton Hayes, John A. Tomasino

RECEIVED

JUL 18 2024

**IN THE DISTRICT COURT OF APPEAL
FOR THE FIFTH DISTRICT, STATE OF FLORIDA**

DISTRICT COURT OF APPEAL
FIFTH DISTRICT

EDITH RENFROE

Appellant

Case no: 2023-1634

-v-

NATIONSTAR MORTGAGE LLC
AND DEERWOOD IMPROVEMENT
ASSOCIATION, Inc.

Appellees

**APPELLANT'S NOTICE OF INTENT TO INVOKE
CONFLICT JURISDICTION OF THE SUPREME COURT OF
FLORIDA**

Appellant, Edith Renfroe, *pro se* pursuant to Fla. R. App. P. 9.120 and 9.030(a)(2)(iv), invokes the Conflict Jurisdiction of the Supreme Court of Florida to review the decision of this Court originally issued 05/14/2024 and rendered 07/10/2024. The basis for jurisdiction is that this Court's decision expressly and directly conflicts with prior appellate court decisions together with its own prior decisions on the same question of law.

Dated: 7/18/2024

Respectfully submitted,

E. Renfro

Edith Renfro, *pro se*
8000 Quailwood Drive
Jacksonville, Fl. 32256
Tel.: (904) 629-6342
Erenfro36@comcast.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a true and correct copy of the foregoing has been furnished via U.S. Postal service this 18TH Day of July 2024 to:

Troutman Pepper Hamilton, Sanders
600 Peachtree Street, N.E. # 3000
Atlanta, ga. 30308-2216

Dated: 7/18/2024

E. Renfro

Edith Renfro, *pro se*

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Edith Renfroe a/k/a Edith Steurer
Renfroe,

Case No.: 5D2023-1634
L.T. No.: 2014-CA-006052

Appellant(s)

v.

Nationstar Mortgage, LLC and
Deerwood Improvement Association,
Inc.,

Appellee(s).

Date: June 11, 2024

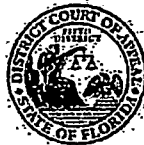
BY ORDER OF THE COURT:

ORDERED that Appellant's Motion for Issuance of a Written Opinion,
Rehearing and for Rehearing En Banc, filed May 23, 2024, is denied.

*I hereby certify that the foregoing is
(a true copy of) the original Court order.*

5D2023-1634 6/11/2024

SANDRA B. WILLIAMS, CLERK



Panel: Judges Makar, Eisnaugle and Pratt

cc:

Alec Peyton Hayes
Colby Keefe
Edith Renfroe
Robertson, Anschutz & Schneid
Kim Stevens
Albert A. Zakarian

**FIFTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA**

**Case No. 5D2023-1634
LT Case No. 2014-CA-006052**

**EDITH RENFROE a/k/a Edith
Steurer Renfro,**

Appellant,

v.

**NATIONSTAR MORTGAGE, LLC
and DEERWOOD IMPROVEMENT
ASSOCIATION, INC.,**

Appellees.

**Nonfinal appeal from the Circuit Court for Duval County.
Peter L. Dearing, Judge.**

Edith Renfro, Jacksonville, pro se.

**Albert A. Zakarian, of Troutman Pepper Hamilton Sanders LLP,
Atlanta, GA, for Appellee, Nationstar Mortgage, LLC.**

No Appearance for Remaining Appellee.

May 14, 2014

PER CURIAM:

AFFIRMED.

MAKAR, EISNAUGLE, and PRATT, JJ., concur.

***Not final until disposition of any timely and
authorized motion under Fla. R. App. P. 9.330 or
9.331.***

M A N D A T E

FROM

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA

FIFTH DISTRICT

THIS CAUSE HAVING BEEN BROUGHT TO THIS COURT BY APPEAL OR BY PETITION, AND AFTER DUE CONSIDERATION THE COURT HAVING ISSUED ITS OPINION OR DECISION;

YOU ARE HEREBY COMMANDED THAT FURTHER PROCEEDINGS AS MAY BE REQUIRED BE HAD IN SAID CAUSE IN ACCORDANCE WITH THE RULING OF THIS COURT AND WITH THE RULES OF PROCEDURE AND LAWS OF THE STATE OF FLORIDA.

WITNESS THE HONORABLE JAMES A. EDWARDS, CHIEF JUDGE OF THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FIFTH DISTRICT, AND THE SEAL OF THE SAID COURT AT DAYTONA BEACH, FLORIDA ON THIS DAY.

DATE: July 10, 2024

FIFTH DCA CASE NO.: 5D2023-1634

CASE STYLE: Edith Renfroe a/k/a Edith Steurer Renfroe v. Nationstar Mortgage, LLC and Deerwood Improvement Association, Inc.

COUNTY OF ORIGIN: Duval County

TRIAL COURT CASE NO.: 2014-CA-006052

**I hereby certify that the foregoing is
(a true copy of) the original Court mandate.**

5D2023-1634-7/10/24
Sandra E. Williams
SANDRA E. WILLIAMS, CLERK



cc:

**Circuit Court Duval
Alec Peyton Hayes
Colby Keefe
Edith Renfroe**

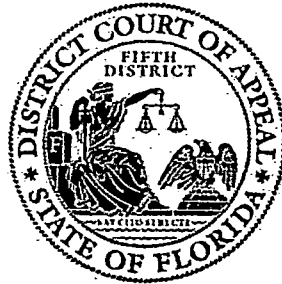
**Robertson, Anschutz & Schneid
Kim Stevens
Albert A. Zakarian**

5DCA CERTIFICATION

I hereby certify that the foregoing is a true and correct copy of the instrument(s) filed in this office.

Witness my hand and official seal this July 18, 2024 .

Sandra B. Williams, Clerk of the Fifth District Court of Appeal.



By: /s/ Kathy Palmere