

**EXHIBIT I**

**CERTIFICATE OF SERVICE FOR DECEMBER  
10, 2013 HEARING AND ORDER  
DISMISSING MOTION TO SET ASIDE SALE**

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
CASE NO. 2005-CP-10-1224

Green Tree Servicing, LLC, as service for  
Bankers Trust Company of California, NA

Plaintiff,

-vs-

Isaiah Ulmer, Deborah J. Ulmer, South  
Carolina Department of Motor Vehicles  
and Ford Consumer Finance, Inc. ,

Defendant(s)

CERTIFICATE OF  
SERVICE

BY



JULIE J. ARMSTRONG  
CLERK OF COURT

2012 OCT 26 PM 1:22

FILED

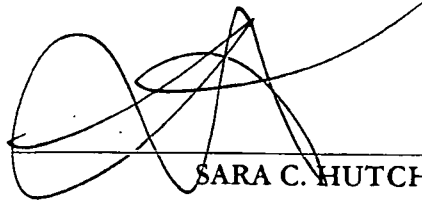
I, Sara C. Hutchins, an employee with Crawford & von Keller, LLC, do hereby certify that on this date, I served a copy of NOTICE OF HEARING FOR DECEMBER 10, 2012 HEARING on counsel listed below, by causing the same to be placed in a sealed envelope, first-class postage pre-paid, and deposited in the United States Mail on the said date, addressed as follows:

Frank L. Valenta, Jr., General Counsel  
Philip S. Porter, Deputy General Counsel  
Linda A. Grice, Assistant General Counsel  
SC Department of Motor Vehicles  
10311 Wilson Blvd.  
PO Box 1498  
Blythewood, SC 29016-0020

Beth Branham Davis  
Brian N. Davis  
DAVIS & DAVIS, LLC  
Post Office Box 31839  
Charleston, SC 29417

Ford Consumer Finance, Inc.  
CT Corporation Registered Agent  
2 Office Park Court, suite 103  
Columbia, SC 29223

October 22, 2012



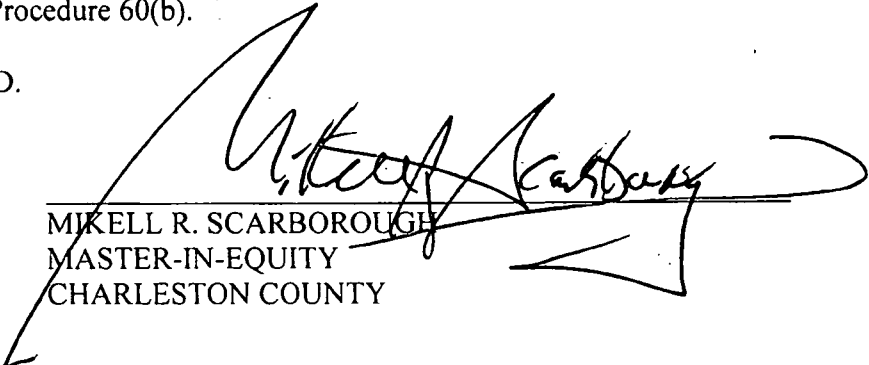
SARA C. HUTCHINS



communication from Defendants' counsel regarding their absence or inability to attend the hearing.

The Court, therefore, denies the Motion to Set Aside the Sale for failure to prosecute. The Court further takes notice that counsel for the Plaintiff represented to the Court that he was informed by his client that no payments have been made on the account since May of 2009. The Motion to Set Aside the Sale is, therefore, also denied as the Affidavits of Isiah Ulmer in Support of the Motion to Vacate Order of Sale fails to establish a meritorious defense, as is required under the Federal Rules of Civil Procedure 60(b).

AND IT IS SO ORDERED.



MIKELL R. SCARBOROUGH  
MASTER-IN-EQUITY  
CHARLESTON COUNTY

Charleston, South Carolina

January 28, 2013

## David J. Crowfoot

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**From:** DavisandDavislaw@aol.com  
**Sent:** Thursday, January 17, 2013 4:56 PM  
**To:** David J. Crowfoot  
**Cc:** ted@crawfordvk.com  
**Subject:** 2005-CP-10-1224-Greentree-v-Ulmer

Dear Judge Scarborough:

We did not receive notice of this hearing set for December 10, 2012, apparently held in the absence of Defendant's counsel, nor did our office receive any calls on December 10, 2012, from Plaintiff's counsel.

As this hearing was for the Defendant's motion, why was the Plaintiff consulted by the Court and allowed to provide the notice of hearing instead of the court scheduling the hearing with Defendant's counsel? Lack of notice of the sale was one of the grounds for filing the Motion in the first place, and we are in the same situation again.

Our office keeps a log of all calls received, and on December 10, 2012, we have no calls regarding this case. We do have a notation that someone called in and, when that person was told I was unavailable, the person hung up and would not leave a message or give a name. All of our messages are logged in carbon message books and no one identifying themselves as Mr. Von Keller, or in any way associated with his firm, the Court, or Court administration or even mentioning this case called our office on December 10 2012 and spoke to any staff nor left any message identifying themselves or referencing a case or hearing. Our legal assistant is prepared to attest to same, and she was at our office for the entirety of that day except for a lunch break when the voice mail would have been recording any message left. If same had occurred, someone from our office or I, myself would have called your office or Mr. VonKeller immediately to advise of our circumstances.

Had we been contacted regarding scheduling the hearing, we would have notified the Court that we were dealing with a serious medical issue that week, and would have requested that the hearing be scheduled for another time. I can provide medical information if necessary (we have the information because we provided medical information to another Court that week due to the problem and the need to reschedule a hearing), but the medical issue is a personal matter and we would prefer to share that privately with the Court if you wish to have the information.

The Defendant objects to this Order and requests that it not be executed by the Court. In the event that this Order prepared and presented by Plaintiff's counsel today, is to be signed despite this information being conveyed today, we are also stringently objecting to the order containing language that indicates that Plaintiff's counsel called our office and indicated a court hearing was transpiring in or absence or about to transpire.

The Defendant objects to the hearing being scheduled and noticed by the Plaintiff. The Defendant requests that the Order proposed by the Defendant not be issued. The Defendant requests that the hearing be re-scheduled and that we be consulted by the Court as to the rescheduling, or at least that we be notified by the Court of the rescheduled hearing date.

Brian N. Davis  
Davis & Davis, LLC  
PO Box 31839  
Charleston SC 29417  
(843)852-5585