

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable Marvin H. Dukes, III, Master in Equity

Case No. 2009-CP-07-04301

Daniel L. Junk and Christine H.
Junk,

v.

Mortgage Electronic Registration
Systems, Inc., and John Does 1-
5,000,

Appellants,

Respondents.

Case No. 2009-CP-07-05088

CitiMortgage, Inc.,

v.

Daniel Junk a/k/a Daniel L. Junk and
Christine H. Junk and Oldfield Community
Association,

Respondent,

Defendants,

Of Whom Daniel L. Junk and Christine H.
Junk are,

Appellants,

-and-

Daniel L. Junk and Christine H. Junk,

v.

CitiMortgage, Inc.

Counterclaim Appellants,

Counterclaim Respondent.

-and-

Daniel L. Junk and Christine H. Junk,

Third-party Appellants,

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v.

Riley Pope & Laney, LLC , Heidi Carey, Esq.,
Roy Laney, Esq., T. Lowndes Pope, Esq.,
Bayview Loan Servicing, LLC, MERSCORP, Inc.,
Mortgage Electronic Registration Systems, Inc.,
Citi Master Servicing, Citigroup Global Markets
Realty Corp., Citigroup Mortgage Loan Trust, Inc.,
John Does 1-5,000, Jennifer Oakes, Robert G.
Hall, Security Connections, Inc., Krystal Hall,
Danielle Sterling, ABC Appraisal Group, Inc.,
Mark A. Ruplinger, Linda Heller, Harry Jones,
Colonial Coast Title Agency, Inc., Lawyers Title
Insurance Corporation, Corelogic, Inc. and American
Home Mortgage Holdings, Inc.

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Third-party Respondents.

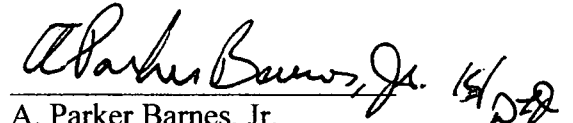
**NOTIFICATION OF FILING UNDER BANKRUPTCY CODE
AND SUGGESTION OF STAY**

Appellants, Counterclaim Appellants and Third-party Appellants, Daniel L. and Christine H. Junk, by and through their counsel, hereby notifies this Court that there is pending in the United States Bankruptcy Court for the Southern District of Ohio, Eastern Division, a proceeding under Chapter 11 of the United States Bankruptcy Code. Said proceeding was filed on June 27, 2013 and was assigned Case No. 13-55139. A copy of the Notice of Bankruptcy Case Filing is attached. The filing of a petition under Chapter 11 of the United States Bankruptcy Code invokes Section 362 of said Code which stays the commencement or continuation of all judicial proceedings against the Debtor that were or could have been commenced to recover a claim that arose prior to the filing of the Chapter 11 bankruptcy proceeding.

{Signature page to follow}

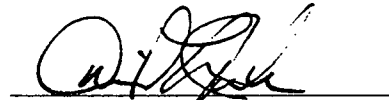
Respectfully submitted,

A.PARKER BARNES, JR., P.A.



A. Parker Barnes, Jr.
Post Office Drawer 1729
500 Carteret Street
Beaufort, South Carolina 29901
(843) 522-2600
Counsel for Appellant Christine Junk

DANIEL L. JUNK, PRO SE



Daniel L. Junk, J.D.
Pro Se Appellant
35 North Fourth Street
Columbus, OH 43221
(614) 648-5062

Signed on behalf of A. Parker Barnes, Jr.
with permission.

Columbus, Ohio
July 2, 2013

United States Bankruptcy Court
Southern District of Ohio

Notice of Bankruptcy Case Filing

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 06/27/2013 at 11:34 AM and filed on 06/27/2013.

Daniel L. Junk
2827 Chateau Circle S
Columbus, OH 43221
SSN / ITIN: xxx-xx-5153

Christine H. Junk
2827 Chateau Circle S
Columbus, OH 43221
SSN / ITIN: xxx-xx-3208



The case was filed by the debtor's attorney:

Susan L. Rhiel
394 E. Town Street
Columbus, OH 43215
(614) 221-4670

The case was assigned case number 2:13-bk-55139 to Judge Charles M Caldwell.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our *Internet* home page <http://ecf.ohsb.uscourts.gov/> or at the Clerk's Office, 170 North High Street, Columbus, OH 43215-2414.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

Kenneth Jordan
Clerk, U.S. Bankruptcy
Court

<https://ecf.ohsb.uscourts.gov/cgi-bin/NoticeOfFiling.pl?675653>

7/2/2013

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Honorable Marvin H. Dukes, III, Master in Equity

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Junk,

Appellants,

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Respondents.

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Respondent,

v.

Daniel Junk a/k/a Daniel L. Junk and
Christine H. Junk and Oldfield Community
Association,

Defendants,

Of Whom Daniel L. Junk and Christine H.
Junk are,

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Counterclaim Appellants,

v.

CitiMortgage, Inc.

Counterclaim Respondent.

Daniel L. Junk and Christine H. Junk,

Third-party Appellants,

v.

Riley Pope & Laney, LLC , Heidi Carey, Esq.,
Roy Laney, Esq., T. Lowndes Pope, Esq.,

Bayview Loan Servicing, LLC, MERSCORP, Inc.,
Mortgage Electronic Registration Systems, Inc.,
Citi Master Servicing, Citigroup Global Markets
Realty Corp., Citigroup Mortgage Loan Trust, Inc.,
John Does 1-5,000, Jennifer Oakes, Robert G.
Hall, Security Connections, Inc., Krystal Hall,
Danielle Sterling, ABC Appraisal Group, Inc.,
Mark A. Ruplinger, Linda Heller, Harry Jones,
Colonial Coast Title Agency, Inc., Lawyers Title
Insurance Corporation, Corelogic, Inc. and American
Home Mortgage Holdings, Inc.

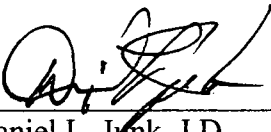
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Third-party Respondents.

PROOF OF SERVICE

I certify that I have served the Appellants', Counterclaim Appellants' and Third-party Appellants' **NOTIFICATION OF FILING UNDER BANKRUPTCY CODE AND SUGGESTION OF STAY** dated July 2, 2013, on counsel listed below by depositing a copy of it in the United States Mail, postage prepaid, on July 2, 2013.

July 2, 2013



Daniel L. Junk, J.D.
Pro Se Appellant, Counterclaim
Appellant and Third-party Appellant
35 North Fourth Street
Suite 200
Columbus, OH 43215
(614) 648-5062

{Service list on following page}

PROOF OF SERVICE

Document(s) Served: NOTIFICATION OF FILING UNDER BANKRUPTCY CODE AND SUGGESTION OF STAY

Persons Served:

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Columbia, SC 29202

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Bolchoz Law Firm, PA
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Bluffton, SC 29910

John Thomas Lay, Esquire
Childs Cantey Thrasher, Esquire
Gallivan White & Boyd P A
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McNair Law Firm, P.A.
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HAYNSWORTH SINKLER BOYD, P.A.
1201 Main Street, 22nd Floor
Columbia, SC 29201-3226

DANIEL L. JUNK, J.D.

Pro Se Appellant

July 2, 2013

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street Street
Columbia, South Carolina 29201

Re: Junk v. MERS et al., Case Tracking No. 2012-210910

Dear Ms. Kitchings,

Enclosed please find an original and seven (7) copies of Appellants, Counterclaim Appellants and Third-party Appellants Daniel L. Junk and Christine H. Junk's **NOTIFICATION OF FILING UNDER BANKRUPTCY CODE AND SUGGESTION OF STAY** dated July 2, 2013; and, an original and one (1) copy of Proof of Service.

Kindly file the originals of each document and file stamp one copy of each and return to me via the postage pre-paid envelope contained with the filing. Should you need anything further please contact me at the number below. Thank you in advance.

Sincerely,



Daniel L. Junk,
Pro se Appellant

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