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Jan 16 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
COURT OF APPEALS

Ali Adebisi
Appellant (s)

Case no. 001700

APPELLANTS REQUEST LEAVE
PURSUANT TO RULE 60

vs

LAKEVIEW LOAN SERVICING, LLC
Respondent (s)

I, Adebisi, Ali, Appellant respectfully move this court for leave pursuant to Rule 60(b) to the South Carolina Court of Appeals based on newly discovered evidence and request to compel the Respondent pursuant to 22 USC 611 & 612. I respectfully request that the court consider the following grounds for relief:

Newly Discovered Evidence:

1. 18 U.S.C. 951(e), states that any person engaged in a legal commercial transaction shall be considered a to be an agent of a foreign government.
2. During proceedings in the lower tribunal court, Appellant was unaware of the commercial transaction and selling of the security (Note) of the property known as 1308 Harmony St., Florence, SC 29501.
3. See attached Affidavit and attached documents.

Legal Basis for Rule 60:

1. newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59 (b);
2. Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership: United States Court 1988-The Supreme Court, in a unanimous decision, held that excusable neglect under Rule 60(b) should be determined based on equitable considerations, taking into account all relevant circumstances surrounding the party's omission. The Court emphasized that inadvertence, mistake, or neglect by an attorney may, in certain circumstances, constitute excusable neglect.

Compel Respondent Pursuant to 22 USC 611 & 612:

1. The relevance of 22 USC 612(a) No person shall act as an agent of a foreign principal unless he has filed with the Attorney General a true and complete registration statement and supplements thereto as required by subsections (a) and (b) of this section or unless he is exempt from registration under the provisions of this subchapter.
2. The relevance of 18 USC 651(e) Notwithstanding paragraph (d)(4), any person engaged in a legal commercial transaction shall be considered to be an agent of a foreign government for purposes of this section if
 - (1) such person agrees to operate within the United States subject to the direction or control of a foreign government or official
3. The compelling of the Registration Statement from the Respondent is mandatory for public disclosure and transparency for legal commercial transactions.

Request for Relief:

1. Appellant request for relief to file motion for new trial pursuant to Rule 60, within a reasonable time no more than a year after the entry of the judgment or order or the date of the proceeding.
2. Request for the court to compel the Respondent pursuant to 22 USC 611 and 612
3. Any additional relief deemed appropriate by the court.

Prayer for Relief:

1. Appellant requests the Court to grant relief for quiet title and any additional relief deemed appropriate by the court.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. For the reasons, Appellant respectfully requests that the Court grant Appellants leave for new trial with the circuit court.



Responsible Party Holder in Due Course

Affidavit of Fact

This affidavit is for case no. 001700 to support the newly discovered evidence for leave to grant a new trial in the lower court. Attached to this affidavit is the FOIA sent to the Respondent who has not responded. The Registration Statement Pursuant to the Foreign Agents Registration Act of 1938 (see attached form entry 79) as amended 22 U.S.C. § 611 for the purposes of registration under the Act for transparency and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act.

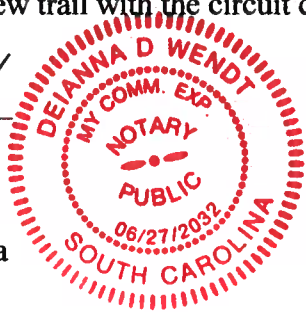
The FOIA request has been sent to the Respondent by certified restricted mail by the following mailing numbers:

- 1. 7022 3330 0000 7007 9364-Chad Wilson Burgess
- 2. 7022 3330 0000 7007 9395-William Haigh Porter
- 3. 7022 3330 0000 7007 9364-Clerk of Court

The Respondents are conducting "Legal Commercial Transactions" and must be registered with the United States Attorney General Office and Attorney General. I have conducted several searches in Florence County FOIA search where the trail took place and there is no record of the Respondents Registration Statement which is mandatory. My security has been sold in the public without consent or authorization from the pool and servicing agreement, nor consent from CHARLES RAY THOMAS II who is also an investor. The Respondent is not registered with the Department of Justice and United States Attorney General to conduct "Legal Commercial Transactions" as a Foreign Agent, then all entries into the court are void ad initio. Having no Registration, the Respondent does not have consent to bring this matter into the court.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. For the reasons, Appellant respectfully requests that the Court grant Appellants leave for new trail with the circuit court.

Deanna D Wendt
Appellant



State of South Carolina
County of Florence

The foregoing affidavit was acknowledged before me this 16 day of

January, 2024 by *[Signature]* Notary Public.

My commission Expires 06/27/2032.

Seal:

Adebisi Ali
In the Matter of CHARLES RAY THOMAS II
1901 W Evans St. Unit 5372
Florence, South Carolina near [29502-7884]

William Haigh Porter
dba Master in Equity
181 N. Irby St.
Florence, SC 29501

RE: Affidavit for Freedom of Information

Greetings,

This FOIA request is mandatory for public disclosure and transparency pursuant to 22 U.S.C. 611. Required for all public officials. I am requesting your Foreign Registration Statement which is supposed to be filed with the Department of Justice. At this request, I hereby give you (3) days to answer before a criminal investigation is commenced.

Ali Adebisi

Responsible Party Holder in Due Course

State of South Carolina
County of Florence

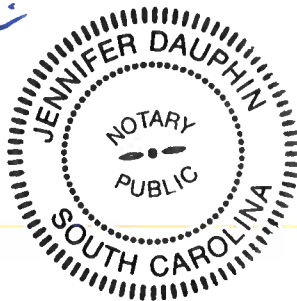
The foregoing affidavit was acknowledged before me this 10th day of

January, 2021 by Jennifer Dauphin Notary Public.

My commission Expires 10/08/2029

Jennifer Dauphin

Seal:



CC: Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

Adebisi Ali
In the Matter of CHARLES RAY THOMAS II
1901 W Evans St. Unit 5372
Florence, South Carolina near [29502-7884]

Chad Wilson Burgess (Duns #008328039)
930 Richland St.
Columbia, SC 29201-2329

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A. Adebisi

Responsible Party Holder in Due Course

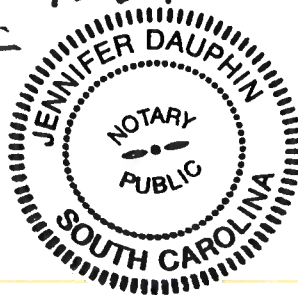
State of South Carolina
County of Florence

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Jennifer Dauphin
Seal:



CC: Department of Justice

950 Pennsylvania Avenue NW

Washington, DC 20530