

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

**RECEIVED**  
JUL 17 2013  
**SC Court of Appeals**

O. Davie Burgdorf, Master-in-Equity

Case No. 2007-CP-38-807

Return to Appellant's Motion to Accept Record on Appeal

Deutsche Bank National Trust Company as Trustee  
for the Holders of New Century Home Equity Loan  
Trust, Series 2005-A, Asset Backed Pass-Through  
Certificates, ..... Respondent,

v.

Laura Toney, LaSalle Bank National Association, as  
Trustee for the registered holders of Structured Asset  
Securities Corporation, Structured Asset  
Investment Loan Trust, Mortgage Pass-  
Through Certificates, Series 2004-11 and LaSalle Bank  
National Association, Trustee for Lehman Brothers  
Structured Asset Investment Loan Trust Sail 2005-2  
of whom  
Laura Toney is ..... Appellant.

Laura Toney  
P.O. Box 722  
Bishopville, SC 29010  
(803) 459-6006  
pro se Appellant

H. Guyton Murrell  
P.O. Box 11264  
Columbia, SC 29211  
(803) 231-2042  
Attorney for Respondent  
Deutsche Bank

Betsy Polk  
P.O. Box 2065  
Columbia, SC 29202  
(803) 252-3340  
Attorney for Respondent  
LaSalle Bank

The Respondent would respectfully return to the Appellant's Motion to Accept Record on Appeal as follows:

1. Appellant is a self represented litigant with a well established history of bad faith litigation in state court and United States Bankruptcy Court actions in this case and other actions.

2. The order being appealed in this case denied a motion to reconsider the denial of an order denying a previous motion for reconsideration pursuant to Rule 60 SCRCF.

3. The order being appealed also sanctioned the Appellant for engaging in frivolous and bad faith litigation.

4. Pursuant to Rule 210(a), an Appellant is required to prepare and serve the Record on Appeal within thirty (30) days after service of the last brief upon all parties who have served a brief. The Record on Appeal did not conform to the appellate rules and Respondent filed a Motion to Dismiss the appeal. Pursuant to an Order filed October 23, 2012, the Motion to Dismiss was denied and Appellant was required to file and serve a corrected Record on Appeal within twenty (20) days. The second Record submitted by Appellant did not conform to the appellate rules and Respondent filed a Motion to Dismiss. After the Respondent's Motion to Dismiss was filed, Appellant filed a Supplemental Record. Pursuant to an order filed July 5, 2013, the Motion to Dismiss was denied and Appellant was again required to file and serve a single unified corrected Record on Appeal within ten (10) days.

5. Pursuant to Rule 210(c), the Record on Appeal shall include all matter designated to be included by any party under Rule 209 and shall comply with the requirements of Rule 267.

6. The multiple Records on Appeal submitted by Appellant are mis-numbered in the respective indexes and the documents contained therein are scattered between the various Records in an unorganized and disjointed fashion.

7. Respondent objects to the Appellant's Motion to Accept Record on Appeal as the numerous Records on Appeal submitted by Appellant are so disorganized and jumbled that they have little use unless such documents are organized into a unified and coherent single Record on Appeal as envisioned and required by the South Carolina Appellate Court Rules and the prior orders of this Court.

8. Appellant does not state a good faith basis in the motion as to why she should not be required to comply with the South Carolina Appellate Court Rules and the specific requirements set forth in the July 5, 2013 Order.

9. Respondent would argue that the Appellant's Motion to Accept Record on Appeal is wholly frivolous and part of the well-established pattern and practice of bad faith and vexatious litigation by Appellant.

For the reasons stated, respondent would argue that the motion is not made in good faith and request that the Court deny the Appellant's Motion to Accept Record on Appeal.

Respectfully submitted,



H. Guyton Murrell  
P.O. Box 11264  
Columbia, SC 29211  
(803) 252-5817  
Attorney for Respondent  
Deutsche Bank

July 17, 2013

**KORN LAW FIRM, P. A.  
POST OFFICE BOX 11264,  
1300 PICKENS STREET  
COLUMBIA, SOUTH CAROLINA 29211  
(803) 252-5817**

July 17, 2013

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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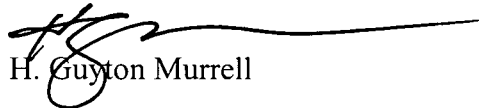
Re: Deutsche Bank v. Laura Toney, et al  
Case No. 2007-CP-38-807  
File No. F27-02370

Dear Sir or Madam:

Enclosed please find the original and six (6) copies of Respondent's Return to Appellant's Motion to Accept Record on Appeal with Proof of Service in the above noted matter. By copy of this correspondence, I am also serving the Appellant with the return.

Your attention in this matter is very much appreciated.

Very truly yours,

  
H. Guyton Murrell

cc:  
Laura Toney  
P.O. Box 722  
Bishopville, SC 29010

IN THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

O. Davie Burgdorf, Master-in-Equity

Case No. 2005-CP-31-169

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**SC Court of Appeals**

Deutsche Bank National Trust Company as Trustee  
for the Holders of New Century Home Equity Loan  
Trust, Series 2005-A, Asset Backed Pass-Through  
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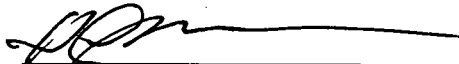
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Through Certificates, Series 2004-11 and LaSalle Bank  
National Association, Trustee for Lehman Brothers  
Structured Asset Investment Loan Trust Sail 2005-2  
of whom  
Laura Toney is ..... Appellant.

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PROOF OF SERVICE

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I certify that I have served the Return to Appellant's Motion to Compel and Affidavit of Dustin Brasington by depositing a copy of it in the United States Mail, postage prepaid, on July 17, 2013, addressed to the pro se Appellant, Laura Toney, P.O. Box 722, Bishopville, SC 29010 and to Betsy Polk, Esquire, P.O. Box 2065, Columbia, SC 29202.



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Attorney for Respondent  
Deutsche Bank