

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. 2007-CP-38-807

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.

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SC Court of Appeals

RETURN TO RESPONDENT’S MOTION TO DISMISS

The Appellant respectfully requests that the Respondent’s Motion to Dismiss is denied for
the following reasons:

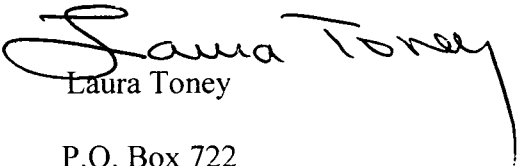
1. The Appellant has witness for years how Mr. Murrell manipulated facts. The
Respondent’s Designation of Matter does not conform to Rule 209 of the FRCP. The

Respondent's Designation of Matter consists of 36 items. The Respondent has requested items #39 and #40 which are not in the Respondent's Designation of Matter.

2. Mr. Murrell has conveniently disregarded the fact that he did not get permission from the court to add other items to his Designation of Matter nor did Mr. Murrell address this issue in his Motion to Dismiss.
3. The Appellant did not intentionally disregard the order from the Court to file an amended Record on Appeal within (10) days, but needs clarification whether to include the items requested by Mr. Murrell that are not in his Designation of Matter.
4. The Appellant is confused and needs clarification. The Appellant has witnessed years of Mr. Murrell's unethical activities. In this case, Mr. Murrell convinced the Court to order the Appellant to pay his law firm illegal interest on a mortgage loan. The Korn Law Firm is not a mortgage company. This is an illegal action on the part of Mr. Murrell. The only way to not face this illegal activity is to get the Appellant's case dismissed.
5. The Appellant needs to get some guidance from the Court whether to include #39 and #40 which are not in the Respondent's Designation of Matter, but requested by Mr. Murrell without permission from the Court.
6. The Appellant's intentions is to not disrespect the Court's order, but needs to know whether Mr. Murrell can request items that he knows are not in his Designation of Matter. Mr. Murrell refused to address this matter in his Motion to Dismiss. PLEASE PROVIDE SOME GUIDANCE IN THIS MATTER.

For the aforementioned reasons, the Appellant respectfully requests that the Respondent's Designation of Matter is declared null and void or the Court gives some guidance as to whether the Appellant should include these items in the Record on Appeal.

August 7, 2013

A handwritten signature in black ink that reads "Laura Toney". The signature is written in a cursive style with a large, looping initial "L".

Laura Toney

P.O. Box 722

Bishopville, SC 29010

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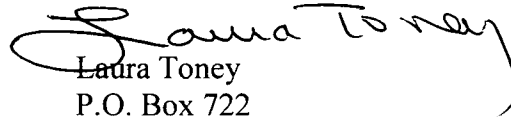
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Of Whom
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CERTIFICATE OF SERVICE

I, Laura Toney, certify that the Reply to the Respondent's Motion to Dismiss was mailed to the Korn Law Firm via United States Postal Service on August 7, 2013, addressed as follows:
P.O. Box 12369, Columbia, SC 29211.

CC: Korn Law Firm


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

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August 7, 2013

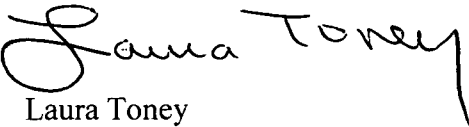
P.O. Box 722
Bishopville, SC 29010

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29010

Dear Sir or Madam:

Please file the enclosed Reply to Respondent's Motion to Dismiss. I have enclosed (1) original and (6) copies.

Sincerely,


Laura Toney

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