

No. 2024-001062

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

**Janet L. Nelums: Christopher Nelums Imperial Warehouse
Finance, Inc, and Best Distributing Company..... Appellants**

v.


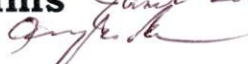
**Deutsche Bank National Trust Company as Trustee for Home
Equity Mortgage Loan Asset-Backed Trust, Series SPMD
2002-B, Home Equity Mortgage Loan Asset- Backed
Certificates, Series SPMD 2002-B under the Pooling and
Servicing Agreement dated September 1, 2002,... Respondent**

**On APPEAL FROM RICHLAND COUNTY Court of Common
Pleas Hon, BEN N. MILLER III as Special Referee Circuit
Court Judge, Case No. 2017CP4001687**

Submitted: June 13,2024 Decided: May 13, 2024

**APPELLANT'S MOTION REQUESTING PERMISSION TO FILE
AMENDED FINAL BRIEF**

* Under Rule 267(e), SCACR, the cover of the final briefs should be the following colors: brief of appellant - blue; brief of respondent - red; reply brief - gray; an amicus curiae or intervenor - green.

Janet Louise Nelums 
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Plaintiff-Appellant pro se litigants

Wednesday, April 9, 2025

COME NOW, Pursuant to Rule 240, SCACR, appellants Janet Nelums & Chris Nelums hereinafter "The"), Appellants, pro se moves the court in the above captioned proceedings; and respectfully requests the Court allow the filing of APPELLANT'S MOTION REQUESTING PERMISSION TO FILE AMENDED FINAL BRIEF, in lieu of the original brief. In support of his/her motion, Appellant's shows unto the Court:

1. Pursuant to Federal Rules of Civil Procedure 15(a) and 15(a)(1), the Appellants hereby submit this Motion to File their Amended Complaint. The Appellants doesn't seek leave to amend Their complaint because the consent of all adverse parties was Not available because the law firm Nelson Mullins Riley & Scarbrough, LLP Matthew A. Abee, SC Bar No. 101100) (Mary S. Williams, SC Bar No. 105883), Attorneys for Respondent Deutsche Bank National Trust Company, did not get permission from Deutsche Bank to File the Motion - because since 2009, DEUTSCHE BANK TERMINATED AS TRUST BENEFICIARIES THIRD- TIER 240 MORTGAGE SECURITIZATION TRUST CREATED BY INDYMAC, INDYMAC FEDERAL. [See: **RULE 8.4: MISCONDUCT** It is professional misconduct for a lawyer to: (a) violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another;(b) commit

a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects; (c) commit a criminal act involving moral turpitude;(d) engage in conduct involving dishonesty, fraud, deceit or misrepresentation. (e) engage in conduct that is prejudicial to the administration of justice: (f) state or imply an ability to influence improperly a government agency or official or to achieve results by means that violate the Rules of Professional Conduct or other law; or (g) knowingly assist a judge or judicial officer in conduct that is a violation of applicable rules of judicial conduct or other law. [See **RULE 7.1: COMMUNICATIONS CONCERNING A LAWYER'S SERVICES.** A lawyer shall not make false misleading or deceptive, Deutsche Bank, communications about the lawyer or the lawyer's services. Communication violates this rule if it: (a) contains a material misrepresentation of fact or law, or omits a fact necessary to make the statement considered as a whole not materially misleading. (b) is likely to create an unjustified expectation about results the lawyer can achieve, or states or implies that the Lawyers can achieve results by means that violate the Rules of Professional Conduct or other law; (c) compares the lawyer's services with other lawyers' services, unless the comparison can

be factually substantiated. (d) contains a testimonial about, or endorsement of, the lawyer (1) without identifying the fact that it is a testimonial or endorsement; (2) for which payment has been made, without disclosing that fact; (3) which is not made by an actual client, without identifying that fact; and (4) which does not clearly and conspicuously state that any result the endorsed lawyer or law firm may achieve on behalf of one client in one matter does not necessarily indicate similar results can be obtained for other clients. This motion is timely for having been filed by the Appellants on March 25, 2025, the Final Brief of Appellant, the Incoming (Amended Final Brief of Appellant) was Filed on March 31, 2025, the Correspondence - Outgoing (In Regards to Amended Final Brief of Appellant) on March 31, 2025, Dear Ms. Nelums and Mr. Nelums: The Court has received your amended final brief of appellant. If you wish to amend your final brief of appellant, you must file a motion pursuant to Rule 240, SCACR. Your filing is being returned to you without action. The Appellants), deadline for the joinder of parties. As required by Rule 15(a)(1), without seeking leave of court. the original of the proposed amended complaint is attached.

- 1.** The Appellant's Final Brief was filed on 03/25/2025

2. On 03/31/2025, Correspondence - Incoming (Amended Final Brief of The Appellant's,

3. On 03/31/2025, Correspondence - Outgoing (In Regard to Amended Final Brief of Appellant), Dear Ms. Nelums and Mr. Nelums: The Court has received your amended final brief of appellant. If you wish to amend your final brief of appellant, you must file a motion pursuant to Rule 240, SCACR. Your filing is being returned to you without action.

4. On 03/24/2025, Motion - Compel Conformity of the Record On Appeal,

5. On 03/05/2025, Record - Record on Appeal Filed the Appellant's

6. On 03/05/2025, Record - Proof of Service of Record on Appeal Filed the Appellant's

7. On 02/03/2025, Initial Brief Filed Respondent-No Reply Filed by the law firm Nelson Mullins Riley & Scarborough, LLP Matthew A. Abee, SC Bar No. 101100) (Mary S. Williams, SC Bar No. 105883), Attorneys for Respondent Deutsche Bank National Trust Company did not get permission from Deutsche Bank to File the Initial Brief Filed Respondent-No Reply, because since 2009, DEUTSCHE BANK TERMINATED AS TRUST BENEFICIARIES THIRD-TIER 240 MORTGAGE SECURITIZATION TRUST CREATED BY

INDYMAC, INDYMAC FEDERAL.

8. On 01/28/2025, Correspondence - Outgoing (One Bound Copy Letter) to Appellant's Ms. Nelums and Mr. Nelums: Our records reflect the time is approaching to file the record on appeal and final briefs. The Supreme Court issued an order reducing the number of copies required in appellate matters. See Re: Reduced Number of Copies Required in Appellate Matters (S.C. Sup. Ct. Order dated August 25, 2021). As permitted by the order, the Court of Appeals has determined a need exists for one additional bound copy of the record on appeal and all final briefs. The additional copies must comply with any binding or cover color requirements specified by Rule 267 of the South Carolina Appellate Court Rules (SCACR).

9. On 01/23/2025, Non-Dispositional Decision - Order – Denying Leave for Sanctions, Appellant's

10. On 01/21/2025, Motion - Reply - Leave for Sanctions Was filed by the Appellant's

11. On 01/17/2025, Designation of Matter - Designation of Matter Filed – Respondent, Filed by the law firm Nelson Mullins Riley & Scarborough, LLP Matthew A. Abee, SC Bar No. 101100) (Mary S. Williams, SC Bar No. 105883), Attorneys for Respondent

Deutsche Bank National Trust Company did not get permission from Deutsche Bank to File the Designation of Matter Designation of Matter, because Since 2009, DEUTSCHE BANK TERMINATED AS TRUST BENEFICIARIES THIRD-TIER 240 MORTGAGE SECURITIZATION TRUST CREATED BY INDYMAC, INDYMAC FEDERAL.

12. On 01/17/2025, Initial Brief – Respondent Filed by the Law firm Nelson Mullins Riley & Scarborough, LLP, Matthew A. Abee, SC Bar No. 101100) (Mary S. Williams, SC Bar No. 105883), Attorneys for Respondent Deutsche Bank National Trust Company did not get permission from Deutsche Bank to File the Initial Brief Filed Respondent- because since 2009, DEUTSCHE BANK TERMINATED AS TRUST BENEFICIARIES THIRD-TIER 240 MORTGAGE SECURITIZATION TRUST CREATED BY INDYMAC, INDYMAC FEDERAL.

13. On 01/13/2025, Correspondence, Incoming (Returned Mail), Ms. Nelums, Mr. Nelums, Upon review of this file, it Appears the Court granted the appellants' motion to file an amended initial brief. Therefore, we are proceeding with this matter pursuant to the appellant's initial brief filed September 23, 2024. The designation of matter received on December 2, 2024, is accepted as filed. Thus, our records reflect it is now time for the respondent's initial brief and designation of matter. If you

wish to request further relief from the Court; you must file a motion.

14. On 01/09/2025, Motion - Return - Return to Motion for Leave to File Sanctions filed by the Appellant's

15. On 12/31/2024, Non-Dispositional Decision – Extension Granted - Return to Appellants' Motion for Leave to Seek Sanctions, filed by the Appellant's, the time for serving and filing the return to the appellants' motion for leave to seek sanctions are hereby extended until January 9, 2025.

16. On. 12/30/2024. Motion - Extension of Time (1st) – Return to Appellants' Motion for Leave to Seek Sanctions, the law firm Nelson Mullins Riley & Scarborough, LLP Matthew A. Abee, SC Bar No. 101100) (Mary S. Williams, SC Bar No. 105883), Attorneys for Respondent Deutsche Bank National Trust The company did not get permission from Deutsche Bank to File Motion - Extension of Time (1st) – Return to Appellants' Motion for Leave to Seek Sanctions, because since 2009, DEUTSCHE BANK TERMINATED AS TRUST BENEFICIARIES THIRD TIER 240 MORTGAGE SECURITIZATION TRUST CREATED BY INDYMAC, INDYMAC FEDERAL.

17. On 12/18/2024, Motion - Requesting Permission to

File Motion for Sanction, filed by the Appellant's

18. On 12/06/2024, Correspondence - Outgoing (Letter Setting Timeline) Ms. Nelums, Mr. Nelums and Counsel, upon review of this file, it appears the Court granted the appellants' motion to file an amended initial brief. Therefore, we are proceeding with this matter pursuant to the appellant's initial brief filed September 23, 2024. The designation of matter received on December 2, 2024, is accepted as filed. Thus, our records reflect it is now time for the respondent's initial brief and designation of matter. If you wish to request further relief from the Court, you must file a motion.

19. On 12/06/2024, Correspondence - Outgoing (Letter Setting Timeline) Dear Ms. Kitchings: We have received the December 3, 2024, letter returning Appellants' Record on Appeal and indicate that Respondent's initial brief is due December 18, 2024. Our records indicate that this matter was held in abeyance until earlier today, and therefore, we were under the impression that the deadlines in this case were stayed until Appellants confirmed their filings to South Carolina Appellate Court Rules, and corrected all deficiencies identified by the Court in the letters dated:

- 20.** On 12/05/2024, Motion - Extension of Time (1st) – Initial Brief of Respondent and Designation of Matter
- 21.** On 12/04/2024, Correspondence - Incoming (From Respondent Counsel)
- 22.** On 12/03/2024, Correspondence - Outgoing (Returning Record on Appeal)
- 23.** On 12/02/2024, Correspondence - Incoming (Record on appeal)
- 24.** On 12/02/2024, Designation of Matter - Designation of Matter Filed - Appellant
- 25.** On 11/19/2024, Deficiency - Deficiency Letter Sent – Designation of Matter
- 26.** On 11/18/2024, Designation of Matter - Designation of Matter Filed - Appellant
- 27.** On 11/06/2024, Correspondence - Outgoing (Letter in Regards to "Reply Brief for the Appellant's Oral Argument") Dear Ms. Nelums and Mr. Nelums: The Court received your filing that purports to be a brief reply and asks for oral argument. You must file your request in the form of a motion pursuant to Rule 240, SCACR. We will not take any further action regarding your filing.
- 28.** On 11/04/2024, Correspondence, Incoming Document

Titled "Reply Brief for the Appellant's Oral Argument Requested)

29. On 10/23/2024, Non-Dispositional Decision - Order
On September 12, 2024, Appellants filed their initial brief. On September 19, 2024, Respondent served and filed its motion to dismiss. On October 1, 2024, Appellants moved to amend their initial brief. No returns were filed. After careful consideration, we deny Respondent's motion to dismiss an alternative request to dispense with further briefing and affirm the order of the trial court. This court will consider the merits of this appeal after briefing is complete. Respondent's motion for sanctions is also denied. ¹ to the extent Respondent is requesting fees and costs, We deny the request. without prejudice as premature. See Rule 222(d), SCACR ("A party desiring costs to be taxed shall, within fifteen (15) days of the issuance of the remittitur, serve and file a motion requesting that costs be assessed under this [r]ule.").The Appellants motion to file an amended initial brief is granted. Appellants shall serve and file their designation of matter within Ten (10) days of this Order.

30. On 10/01/2024, Motion - To Amend Initial Brief of Appellant

31. On 09/24/2024, Correspondence - Outgoing (In

Regards to Amended Initial Brief of Appellant) Dear Ms. Nelums and Mr. Nelums: The Court received your amended initial brief of appellant. If you wish to file an amended brief, you must first file a motion requesting permission to file an amended initial brief.

32. On 09/19/2024, Motion – Dismiss Respondent Filed by the Law firm Nelson Mullins Riley & Scarborough, LLP, Matthew A. Abee, SC Bar No. 101100) (Mary S. Williams, SC Bar No. 105883), Attorneys for Respondent Deutsche Bank National Trust Company did not get permission from Deutsche Bank to File the Motion – Dismiss Respondent filed- because since 2009, DEUTSCHE BANK TERMINATED AS TRUST BENEFICIARIES THIRD-TIER 240 MORTGAGE SECURITIZATION TRUST CREATED BY INDYMAC, INDYMAC FEDERAL.

33. On 09/13/2024, Deficiency - Deficiency Letter Sent Dear Mr. Nelums and Ms. Nelums: Upon reviewing your initial brief of appellant, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or this matter will be dismissed:

34. On 09/12/2024, Initial Brief - Appellant

35. On 08/14/2024, Correspondence - Incoming

(Returned Mail) filed by the Appellant's

- 36.** On 08/14/2024, Correspondence - Outgoing
(Letter Setting Date for Initial Brief of Appellant)
- 37.** On 08/13/2024, Deficiency - Correction - Filing
Fee filed by the Appellant's
- 38.** On 08/13/2024 Transcript Documents - No
Transcript to be Ordered filed by the Appellant's
- 39.** On 08/09/2024, Deficiency - Deficiency Letter Sent –
Amended filed by the Appellant's
- 40.** On 08/09/2024, Deficiency - Deficiency Letter Sent
Filing Fee filed by the Appellant's
- 41.** On 08/09/2024, Correspondence - Outgoing
(Clarification Request Letter)
- 42.** On 08/09/2024, Motion - Extension of Time (1st) –
Appellant's Initial Brief and Designation of Matter
- 43.** On 07/29/2024, Correspondence - Outgoing (Letter
Declining to Act on Motion and Setting Time for Transcript)
- 44.** On 07/26/2024, Correspondence - Incoming (Motion
for Extension to File Briefs)
- 45.** On 07/11/2024, Correspondence - Outgoing
(Transcript to be Ordered Letter)
- 46.** On 06/28/2024, Correspondence - Outgoing (Initial

Letter)

47. On 06/27/2024, Transfer - To Court of Appeals

48. 06/27/2024, Non-Dispositional Decision – Order

Transferring to Court of Appeals

49. On 06/25/2024, Notice of Appeal (Civil) - Initial filed by the Appellant's

50. The Rules provide that "leave to amend shall be freely given when justice so requires." FED.R.CIV. P. 15(a). And given that This motion is timely, and discovery is just beginning, there will be no prejudice to the current defendants. As such, the plaintiffs respectfully request that the Court grant this motion to amend, and direct clerk to file the attached Second Amended brief.

51. Appellants of their right to file an amended complaint under Rule 15. If in conflict, the Local Rule must yield to the federal rule, here Rule 15. [See *Colgrove v. Battin*, 413 U.S. 149, 161 n.18 (1973).

52. that Rule 15 confers a "right" to amend upon parties. See *Lacey v. Maricopa Cty.*, 693 F.3d 896, 927 (9th Cir. 2012), parties have twenty-one days "to amend as of right"); *Rick-Mik Enters., Inc. v. Equion Enters. LLC*, 532 F.3d 963, 977 (9th Cir.

2008), explaining in reamendment context that until a responsive pleading is filed or a final judgment of the case is entered, the Appellants had an absolute right to amend”); *Shaver v. Operating Eng’rs Local 428 Pension Trust Fund*, 332 F.3d 1198, 1201 (9th Cir. 2003) (before a responsive pleading was filed and before the case was dismissed, the Appellants “had an absolute right to amend their complaint”); *Sanford v. Motts*, 258 F.3d 1117, 1120 (9th Cir. 2001) ([Rule 15(a)] “gives an Appellants one opportunity to amend as of right.

53. pursuant to Federal Rule of Civil Procedure 15(a), to seek leave of court before filing his Second Amended Complaint. The panel held that Rule 15(a) does not impose any particular timing mechanism governing the order in which amendments must be made. Because plaintiff’s First Amended Complaint, filed with consent of the opposing party, complied with Rule 15(a)(2) as an “Other amendment,” Appellants was permitted to file a timely Second Amended Complaint “as a matter of course” under Rule 15(a)(1), without seeking leave of court. Accordingly, RAMIREZ V. CTY. OF SAN BERNARDINO.

54. The appellant's initial brief is presently due to be filed No Later Then September 23,2024

55. appellant Janet Nelums & Chris Nelums appeals- the order Judgment of the Special Referee for Richland County, Attorney Ben N. Miller, III SC Bar # :3977, as Special. Referee issued an Order dated May 13, 2024, which was received by appellant's, On May 9, 2024. Pursuant to Rules 53(b)of the South Carolina Rules Of Civil Procedure without the parties' consent to the master Order Reference exceeded his authority by violating The General Assembly in including the specific requirements of section See FED. R. Civ. P. 53(b), 28 U.S.C. §§ 636(c)(1) & (c)(3). See 28 U.S.C. § 636(b)(2) 28 U.S.C. § 636(c)(4); 28 U.S.C. §636(c)(5), that Must be satisfied before authority to Rule 28 U.S.C. §§ 636(c) as South Carolina Supreme Court has held, "The term 'shall' in a statute means that the action is mandatory, fundamental principles of law. First, all of our courts are bound to follow clear and unambiguous statutory law,

56. The ground for filing of this special APPELLANT'S MOTION REQUESTING PERMISSION TO FILE AMENDED FINAL BRIEF, IS That other impending professional matters and obligations Have created a need for this Court to grant the APPELLANT'S MOTION REQUESTING PERMISSION TO FILE AMENDED FINAL BRIEF, A Five-day delay will not prejudice the rights of any of the parties.

We have notified counsel for the parties below of our intent to File this motion. No party has objected. Counsel for the Counsel of Record: FOR NELSON MULLINS RILEY & SCARBOROUGH LLP, Matthew A. Abee, SC Bar No. 101100, Madison C. Guyton, SC Bar No.105205, 1320 Main Street/ 17th Floor) Columbia, SC 29201, SCOTT AND CORLEY, P.A. Attorneys and Counsellor's at Law Street Address: 2712 Middleburg Drive, Suite 200 Columbia, SC 29204, the opposing party with respect to the order from which appellant Janet Nelums & Chris Nelums has appealed, no additional time is requested to Prepare the Final amended Brief of Appellants.

57. appellant Janet Nelums & Chris Nelums Appeal Case No.2024-001062, was transfer by the Honorable Patricia A. Howard Clerk, Supreme Court of South Carolina Post Office Box 11330 Columbia, South Carolina 29211, to South Carolina Court of Appeals on June 28, 2024, in order to defend our cause, the appellants Janet Nelums & Chris Nelums anticipates that they will not be able to finish said appellants Brief within the period provided. Hence, that they are constrained to ask for an extension of twenty (20) days from today or-until _ August 2024 within which to file and submit appellants Brief.

58. Appellants submitted; APPELLANTS CORRECTED AMENDED OPENING BRIEF motion to this court in September

23, 2024,

59. In September 2024, Catherine S. Harrison, Chief Deputy Clerk of the South Carolina Court of Appeals as stated in her letter to appellants Janet Nelums & Chris Nelums; The Court Received your amended initial brief of Appellants, if you wish to File an amended brief, you must first a motion requesting Permi5.sion to file an amended initial brief.



60. on information and belief, appellants don't need to leave to file APPELLANT'S MOTION REQUESTING PERMISSION TO FILE AMENDED FINAL BRIEF, in the South Carolina Court of Appeals [**See Exhibit A**]

61. Pursuant to Federal Rules of Civil Procedure 15(a) and 15(a)(1), and 15(a)(2). And given that this motion is timely, the Appellants hereby submit this Motion to File their Amended Complaint. The Appellants don't seek leave to amend Their complaint because the consent of all adverse parties was Pursuant to Rule 240, SCACR, and Pursuant to Federal Rules of Civil Procedure 15(a) and 15(a)(1), the Appellants hereby submit this Motion to File their Amended Complaint. The Appellants don't seek leave to amend Their complaint, as such, the Appellants respectfully request that the Court grant this motion

to amend, and direct clerk to file the attached Amended Final Brief of the Appellants,

•Rule 15(a) provides: (1) Amending as a Matter of Course. A party may amend its pleading once as a matter of course, within:
(A) 21 days after serving it,

Respectfully submitted on this 9 day of April 8, 2025

Janet Louise Nelums 
Chris Nelums 
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jnelums@gmail.com
chrisnelums@yahoo.com



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
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March 31, 2025

Janet Nelums
813 N. Highland Forest Dr.
Columbia SC 29203

Christopher Nelums
813 N. Highland Forest Dr.
Columbia SC 29203

Re: Deutsche Bank National Trust Company v. Janet L. Nelums
Appellate Case No. 2024-001062

Dear Ms. Nelums and Mr. Nelums:

The Court has received your amended final brief of appellant. If you wish to amend your final brief of appellant, you must file a motion pursuant to Rule 240, SCACR. Your filing is being returned to you without action.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Harrison, deputy".

CLERK

cc: Matthew A. Abee, Esquire
Madison Caroline Guyton, Esquire
Jordan Daniel Beumer, Esquire
Vance L. Brabham, III, Esquire
Jessica S. Corley, Esquire
Reginald Patrick Corley, Esquire
Henry Guyton Murrell, Esquire
William Price Stork, Esquire
Tasha B. Thompson, Esquire

cc: Matthew A. Abee, Esquire
Madison Caroline Guyton, Esquire
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Vance L. Brabham, III, Esquire
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Tasha B. Thompson, Esquire



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

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March 31, 2025

Janet Nelums
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Columbia SC 29203

Christopher Nelums
813 N. Highland Forest Dr.
Columbia SC 29203

Re: Deutsche Bank National Trust Company v. Janet L. Nelums
Appellate Case No. 2024-001062

Dear Ms. Nelums and Mr. Nelums:

The Court has received your amended final brief of appellant. If you wish to amend your final brief of appellant, you must file a motion pursuant to Rule 240, SCACR. Your filing is being returned to you without action.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Harrison, deputy".

CLERK

cc: Matthew A. Abee, Esquire
Madison Caroline Guyton, Esquire
Jordan Daniel Beumer, Esquire
Vance L. Brabham, III, Esquire
Jessica S. Corley, Esquire
Reginald Patrick Corley, Esquire
Henry Guyton Murrell, Esquire
William Price Stork, Esquire
Tasha B. Thompson, Esquire

Attached The Nelums Amended Final Brief

Janet Nelums
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April 8, 2025

Jenny Abbott Kitchings, Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

Catherine S. Harrison, Chief Deputy Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

APR 09 2025
SC Court of Appeals

Re: Janet Nelums & Chris Nelums v.
Deutsche Bank National Trust Company as Trustee for Home Equity Mortgage
Loan Asset-Backed Trust, Series SPMD 2002-B, Home Equity Mortgage Loan
Asset Backed Certificates, Series SPMD 2002-B,;

Appellants Case No. 2024-001062

Trial Case No: 2017CP4001687

Dear Mr./ Ms. Clerk:

Enclosed herewith please find the original and one copy of the
following:

1. APPELLANT'S MOTION REQUESTING PERMISSION TO FILE AMENDED FINAL BRIEF
2. **the attached Amended Final Brief of the Appellants,**
3. A clerk is not permitted to refuse filing a document for form as Required by rule 5. (d)(4) of the Federal Rules of Civil Procedures specifically, state.
4. 5.(d)(4) Acceptance by the clerk. A clerk must not refuse to file A paper solely because it is not in the form prescribed by these rules or by a local rule or practice

Kindly return a time stamped copy of all documents to us. A return envelope Has been provided for this purpose.

Very truly yours

Janet Nelums & Chris Nelums

JN/CN
Enclosed