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April 25, 2025

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Apr 25 2025
SC Court of Appeals

Via Email Only to ctappfilings@sccourts.org

The Honorable Catherine S. Harrison
Chief Deputy Clerk of the Court of Appeals of South
Carolina

RE: *U.S. Bank Trust National Association not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2020-GS1, Rushmore Loan Servicing, Goldman Sachs Mortgage Company, U.S. Bank, and U.S. Bank National Association, Respondent v. Jacob Fulks and Florene Fulks, Appellants*
Appellate Case # 2024-001719
Our file # 514332.471

Dear Ms. Harrison:

In response to the Court's letter to Robert Brooks Wright, Esquire, of April 25, 2025, concerning the overdue initial briefs and designation of matter of Goldman Sachs Mortgage Company and Rushmore Loan Servicing, please note that Mr. Wright was relieved as counsel of record in this appeal by Order entered on March 27, 2025.

While I do not represent either Goldman Sachs Mortgage Company or Rushmore Loan Servicing in this appeal, I would note that they are not proper parties to this case. Those two companies were improperly inserted into the case caption by *Pro Se* Appellants Jacob Fulks and Florene Fulks in their lower court pleadings. Appellants never moved the lower court for the joinder of those entities as additional parties, and the Master in Equity never entered an order of joinder of either entity. Although Appellants filed a "Certificate of Services" on February 8, 2024, in the lower court claiming to have served those entities by "Certified Registered Letter", they never filed any proof of service of their lower court pleadings on those entities. As such, the lower court never had personal jurisdiction over these entities, they never should have been part of the case caption, and I would not expect that either entity will be participating in this appeal.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Sean M. Foerster", with several overlapping strokes.

Sean M. Foerster

cc via email only:

Jacob Fulks and Florene Fulks

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