

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Case No. 2006-CP-10-2859
Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2005-R4CGM under the Pooling and Servicing
Agreement dated as of May 1, 2005, without
Recourse.....Respondent,

v.

Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards; Sylvia Anne Lawrence a/k/a
Sylviatte Anne Lawrence; Glenn M. Huggins;
Michael Huggins; Donnell Huggins; Samuel
Huggins; Ira Huggins a/k/a Ira S. Huggins;
Derwin Huggins; Andrean Huggins Cotton
a/k/a Adrienne Huggins Cotton; Sharon H. Smack;
Dewayne Dixon; Kimberly Nelms; Timothy Nelms;
Jennifer Nelms; Michael A. Brown;
Demetrius Huggins Nelms, a minor;
Darius Simmons, a minor; Dondre Simmons, a minor;
Reginald Huggins; Joseph Huggins; Heather Huggins;
Barbara Huggins; any other Heirs-at-Law or Devisees of
Ricky Henry Huggins, Deceased, their heirs,
Personal Representatives, Administrators, Successors and
Assigns, and all other persons entitled to claim through them;
any other Heirs-at-Law or Devisees of Henry Buster Huggins, Jr.,
Deceased, their heirs, Personal Representatives, Administrators,
Successors and Assigns, and all other persons entitled to claim
through them; any other Heirs-at-Law or Devisees of
Michelle Huggins, Deceased, their heirs, Personal Representatives,
Administrators, Successors and Assigns, and all other persons entitled
to claim through them; any other Heirs-at-Law or Devisees
of Buster Huggins, Sr., Deceased, their heirs, Personal
Representatives, Administrators, Successors and

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Assigns, and all other persons entitled to claim through them;
all unknown persons with any right, title or interest
in the real estate described herein; also any persons
who may be in the military service of the United States
of America, being a class designated as John Doe;
and any unknown minors or persons under a disability
being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor
Credit Company; General Motors Acceptance Corporation;
White Directory Holdings Carolina, Inc. d/b/a The Talking
Phone Book; Monogram Credit Card Bank of Georgia;
Michael Twitty; Deborah Twitty; the United States of America,
by and through its agency, the Internal Revenue Service;
and John C. Bigler..... Defendants,

Of whom Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards is theAppellant.

RESPONDENT'S MOTION FOR EXTENSION OF TIME

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Attorneys for Respondent Deutsche Bank
National Trust Company, as Trustee of
Ameriquest Mortgage Securities, Inc., Asset
Backed Pass Through Certificates, Series
2005-R4CGM under Pooling and Servicing
Agreement dated as of May 1, 2005, without
recourse

October 15, 2013

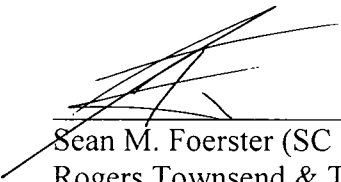
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Respondent Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under Pooling and Servicing Agreement dated as of May 1, 2005, without recourse (“Deutsche Bank”) hereby moves for an extension of time to file its Final Brief of the Respondent on the grounds that the current version of the Record on Appeal filed and served by Appellant Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards (“Vandora Huggins”) on September 24, 2013, improperly omits several documents from the Record on Appeal that were designated for inclusion by Deutsche Bank in its Designation of Matter, improperly includes matter not presented to the lower court, does not have consecutively numbered pages, is not arranged in the order required by Rule 210(c), SCACR, and does not contain the certification required by Rule 210(g), SCACR.

Contemporaneously herewith, Deutsche Bank has filed a Motion to Correct the Record on Appeal, or, in the alternative, to Dismiss the Appeal asking the Court to address these deficiencies. Until these issues are resolved and the Record on Appeal finalized, it would be premature to require Deutsche Bank to submit a Final Brief with citations to the Record on Appeal. Deutsche Bank respectfully requests that its time to submit a Final Brief be tolled until after the Court rules on its Motion to Correct the Record on Appeal, or, in the alternative, to Dismiss the Appeal.

[signature on following page]

Respondent's Motion for Extension of Time
Appellate Case No. 2012-212524



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Attorneys for Respondent Deutsche Bank
National Trust Company, as Trustee of
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Backed Pass Through Certificates, Series
2005-R4CGM under Pooling and Servicing
Agreement dated as of May 1, 2005, without
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Deutsche Bank National Trust Company, as
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v.

Vandora M. Huggins-Edwards a/k/a Vandora
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Sylviatte Anne Lawrence; Glenn M. Huggins;
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Dewayne Dixon; Kimberly Nelms; Timothy Nelms;
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Ricky Henry Huggins, Deceased, their heirs,
Personal Representatives, Administrators, Successors and
Assigns, and all other persons entitled to claim through them;
any other Heirs-at-Law or Devisees of Henry Buster Huggins, Jr.,
Deceased, their heirs, Personal Representatives, Administrators,
Successors and Assigns, and all other persons entitled to claim
through them; any other Heirs-at-Law or Devisees of
Michelle Huggins, Deceased, their heirs, Personal Representatives,
Administrators, Successors and Assigns, and all other persons entitled
to claim through them; any other Heirs-at-Law or Devisees
of Buster Huggins, Sr., Deceased, their heirs, Personal
Representatives, Administrators, Successors and

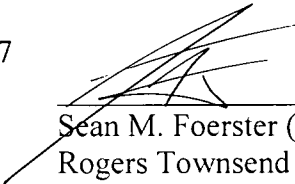
Assigns, and all other persons entitled to claim through them;
all unknown persons with any right, title or interest
in the real estate described herein; also any persons
who may be in the military service of the United States
of America, being a class designated as John Doe;
and any unknown minors or persons under a disability
being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor
Credit Company; General Motors Acceptance Corporation;
White Directory Holdings Carolina, Inc. d/b/a The Talking
Phone Book; Monogram Credit Card Bank of Georgia;
Michael Twitty; Deborah Twitty; the United States of America,
by and through its agency, the Internal Revenue Service;
and John C. Bigler..... Defendants,

Of whom Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards is theAppellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent's Motion for Extension
of Time on October 15, 2013, by depositing a copy of each in the United States Mail,
postage prepaid, addressed to the following party of record:

Vandora M. Huggins
1218 Gunn Avenue
Charleston, South Carolina 29407


Sean M. Foerster (#77466)
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Trust Company, as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass Through
Certificates, Series 2005-R4CGM under Pooling
and Servicing Agreement dated as of May 1, 2005,
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VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

RE: *Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under the Pooling and Servicing Agreement dated as of May 1, 2005, without recourse vs. Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards, et al.*

Appellate Case No. 2012-212524
Civil Action# 2006-CP-10-2859
Our File # 010378-00062

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Dear Ms. Kitchings:


Enclosed for filing are the originals and seven (7) copies of Respondent's Motion to Correct the Record on Appeal, or in the Alternative, to Dismiss the Appeal with Proof of Service, and Respondent's Motion for Extension of Time to File Final Brief with Proof of Service in the above matter, along with a check in the amount of \$50.00.

By copy of this letter, I am serving one copy of Respondent's Motion to Correct the Record on Appeal, or in the Alternative, to Dismiss the Appeal with Proof of Service, and Respondent's Motion for Extension of Time to File Final Brief with Proof of Service on Appellant Vandora M. Huggins-Edwards.

Please have your staff return a filed copy of each of these documents to me in the enclosed self-addressed, postage pre-paid envelope enclosed for your convenience.

Thank you for your assistance in this matter.

Very truly yours,



Sean M. Foerster

SMF/tds
Enclosures

cc:
Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, South Carolina 29407