

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY

MASTER IN EQUITY COURT

HONORABLE JUDGE MIKELL R. SCARBOROUGH

Case No. 2006-CP-10-2859

Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as Trustee of
Ameriquest Mortgages Securities, Inc. Asset Backed Passed
Through Certificates, Series 2005-R4CGM under the Pooling
And Servicing Agreement dated as May 01, 2005, without recourse,

Respondent,

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SC Court of Appeals

v.

Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards; Sylvia Anne Lawrence a/k/a Sylviatte Anne Lawrence; Glenn Huggins; Micheal Huggins; Donnell Huggins; Samuel Huggins; 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 Devises of Rickey 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 Devises 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 Devises 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 Devises of Buster Huggins Sr., Deceased, their heirs, Personal Representative, 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; 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 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 Holding 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 _____ Appellant.

Motion To Deny Respondent
Attorney Request For
Dismissal

Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, S. C. 29407
(843) 801-7392
Appellant-Pro Se

Rogers Townsend & Thomas, PC
Post Office Box 100200 (29202)
220 Executive Center Drive
Columbia, SC 29210
(803) 771-7900
Attorneys for Respondent

Sean M. Forester (#77466)

October 23, 2013

The Appellant Vandora M. Huggins-Edwards has initially informed the Court of Appeal to the underlying fact that I am not an Attorney with little understanding of the State and Federal Laws. Please take into consideration I do understand that I have the right to defend myself in the Court of the Law to the best of my ability against Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certifications, Series 2005-R4CGM under Pooling and Servicing Agreement dated as of May 1, 2005, without recourse .

To the Appellant understanding in accordance to Rule 208 Initial Briefs (C) goes along with my Designation of Matter and on the Record of Appeal the concise history of the proceedings that lead up trail hearing on February 28, 2012 insofar that All documents are necessary to the understanding in this appeal.

The Appellant under Rule 210 (c) submitted prior orders, judgments, decisions and proceedings of the lower court to show cause of action that Foreclosure action 06/2859 was once a joint action of Civil Action 2007-CP-10-2596 the Respondent Attorney want the Court to dismiss the fact that Deutsche Bank already received a Partial Summary Judgment as describe in the order dated April 09, 2009 in the Lower Court.

The fact is the Appellant did submitted some document that was requested by Deutsche Bank some of those documents contained the same documents and I Choose not to overwhelm the Courts with repeating documents.

The fact is the appellant did submitted documents that support the Appellant claim of Poor defense by the attorney Arthur McFarland those are documents that my Attorney should have filed into evidence at the trail hearing on my behalf.

The Appellant did not received any notice from South Carolina Court of Appeal Stating that the Record on Appeal was not filed in a timely matter.

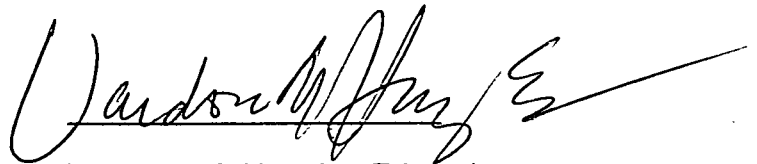
The fact is the Appellant did served sixteen copies of the Record on Appeal To the Court . The fact is the Appellant is Disable Veteran living on a fix income Which made it impossible for me to turn around and file and 16 copies of my Final brief.

The fact is the Respondent Attorney is seriously avoiding the true Issue that the Appellant is victim of Predatory Lending in the matter of foreclosure Action 06/2859 The appellant is also a victim of John C. Bigler fraudulent Delinquent tax sale that do Involve the Law Firm of Rogers & Townsend.

The fact is the Respondent Attorney is telling this court that the cannot defend their Client properly due to clerical deficiencies that was submitted by the Appellant.

The Appellant is respectfully requesting that this Court make the decision as they View in the eyes of the Law and lets more forward to make a final decision not to dismiss this appeal.

Respectfully submitted,



Vandora M. Huggins-Edwards
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Charleston, South Carolina 29407
(843) 801-7392
Appellant

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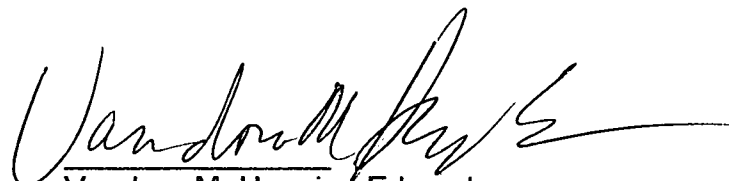
America, being a class designated as John Doe; and any unknown minors or persons disability being a class designated as Richard Roe; South Carolina Department of Revenue; Safeway Finance; Ford Motor Credit Company; General Motors Acceptance Corporation; White Directory Holding Carolina, Inc. d/b/a The 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 _____ Appellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Appellant Motion to Deny Dismissal of Appeal on October 23, 2013, by depositing a copy of each in the United States Mail addressed to the following party of record.

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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 May 1, 2005,
Without recourse



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The Appellant-PRO SE