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OCT 27 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

ON APPEAL FROM RICHLAND COUNTY Court of Common Pleas
BEN N. MILLER III as Special Referee, Court of Common Pleas Judge

(Lower Court Case No. 2017CP4001687)

Appellants Case No. 2024-001062

Janet L. Nelums a/k/a Janet Nelims, Christopher Nelums,
Imperial Warehouse Finance, Inc., and Best Distributing
Company..... Appellants.,

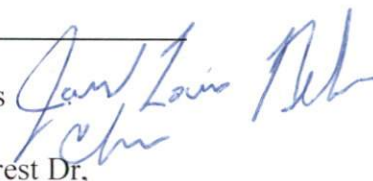
v.

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 Sept. 1, 2002 Respondent,

THIRD REQUESTED MOTION OF APPEIANTS TO EXTEND

DEADLINE TO SERVE, PROCEDURAL DUE PROCESS DEFECT

Janet Louise Nelums
Chris Nelums
813 N. Highland Forest Dr,
Columbia, SC 29203-1929
(803) 730-6003
jnelums@gmail.com
chrisnelums@yahoo.com
Appellant pro se litigants



Appellants Janet Nelums and Christopher Nelums hereby move Pursuant to Rule 263(b), SCACR, for a second 30-day extension of Time to November 20, 2025, in which to serve and file what the Court is Requesting from the appellants, The matter is currently Due on October 20, 2025, The grounds for this motion that a good Cause to grant the request is as follows

Article III, Section 2, Clause 1:

The judicial Power shall extend to all Cases, in Law and Equity, arising under this Constitution, the Laws of the United States, and Treaties made, or which shall be made, under their Authority; —to all Cases affecting Ambassadors, other public Ministers and Consuls; to all Cases of admiralty and maritime Jurisdiction; to Controversies to which the United States shall be a Party; —to Controversies between two or more States; between a State and Citizens of another State, between Citizens of different States, between Citizens of the same State claiming Lands under Grants of different States, and between a State, or the Citizens thereof, and foreign States, Citizens or Subjects.

Appellants never received written notice of this Order on the date, A copy of the Order is attached to this Notice of Appeal. Where service

of process was not made pursuant to statute and Supreme Court Rules, **Janove v. Bacon**, 6 Ill. 2d 245, 249, 218 N.E.2d 706, 708 (1955). RECEIVED OCTOBER 14, 2025, RETURN TO SENDER [**See:**

Exhibit-A

1. Good Cause Exists for the extension, Nelums “case [] Raise[d] in the request of the extension Fifth and Fourteenth Amendments of the U.S. Constitution. Due process defect issues on July 8, 2025,” Applicants argued That the appellate court should make an independent Examination of the whole record in order to make sure that the denial does not constitute a Due process defect July 8, 2025, October 14, 2025

2. Due process is a constitutional guarantee that ensures Individuals receive proper notice of legal action against them. Defective service of process can violate this guarantee, leading to the dismissal of a lawsuit or other legal action. The legal basis for service of process is rooted in the constitutional guarantee of due process, which is enshrined in the Fifth and Fourteenth Amendments of the U.S. Constitution. Service of process allows defendants to respond to legal claims and is governed by jurisdiction-specific rules, such as Rule 4 of the Federal Rules of

Civil Procedure. Proper service typically requires delivering legal documents to the defendant in a manner prescribed by law, such as personal delivery, leaving documents at the defendant's residence, or using certified mail. If service is defective, it can affect the validity of the case against the defendant and may lead to a dismissal or delay in proceedings

3. Good Cause Exists for the extension, Elmore v. McCammon (1986) 640 F. Supp. 905 "... the right to file a lawsuit Pro "Se is one of the most important rights under the constitution and laws.

4. Good Cause Exists for the extension "Alexander v. Bothsworth, 1915. "Party cannot be bound by contract that he has Not made or authorized. Free consent is an indispensable element In making valid contracts."

5. Good Cause Exists for the extension Miller v. US, 230 F 486, 489. "There can be no sanction or penalty imposed upon one Because of this exercise of constitutional rights."

6. Appellants Janet Nelums and Christopher Nelums on October 8th 2025, asks the Court to extend their time to file a response For good cause to November 20, 2025,

7. Due to illness in the family

8. Due Process of Defective service of process
9. A \$50 filing fee is attached as required.
10. Accordingly, an extension is needed.

Appellant prays for an order extending the time in which to serve
And file the appellants respectfully request to submit responsive
Pleadings by November 20, 2025

October 27, 2025.

Respectfully submitted,

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Appellant pro se litigants



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed into Action No. **2024-001062** and served on this October 27, 2025, as indicated on October 27, 2025, was served by Certified Registered which constitutes service on all parties.

The Honorable Kristi F. Curtis
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Richland County, Sheriff Leon Lott
in His Official Capacity as The Sheriff of
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and Civil Process Division
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phone: 803-576-3000.
fax: 803-576-319

Richland County, Sheriff Leon Lott
in His Official Capacity as The Sheriff of
The Richland County Sheriffs Department
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fax: 803-576-319

Hon, Mr. Daniel McLeod Coble
ATTN: Chief Judge Richland County
1701 Main Street
Columbia, SC 29202.
Office: (803) 576-1773
dcoblej@sccourts.org

EXHIBIT-A



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

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October 09, 2025

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

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

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SC Court of Appeals

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

Dear Ms. Nelums and Mr. Nelums:

Upon reviewing your motion for an extension of time to serve and file the bound copies of the final brief of appellant and record on appeal, 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 your filing will not be considered:

- The required filing fee has not been submitted. The correct filing fee is \$50.00

Very truly yours,

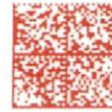
Catherine Harrison, deputy
CLERK



South Carolina Court of Appeals

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SC Court of Appeals

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