

STATE OF SOUTH CAROLINA) FILED COURT OF COMMON PLEAS
COUNTY OF LEXINGTON) 2025 AUG -4 AM 11:04 ELEVENTH JUDICIAL CIRCUIT

LISA M. COMER
CLERK OF COURT
LEXINGTON SC

Linda Hartley) CASE NO: 2025-CP-32-00616

Plaintiff,)
Vs.) MOTION REQUEST FOR COURT HEARING
) AND COUNTERCLAIM ORDER

USBank Trust National Association
As Trustee for BKPL-EG Holding)
Trust,)
Defendant(s))

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SC Court of Appeals

A cause of this action was brought against the defendant(s) by the Plaintiff, filing a Legal Action February 12,2025, after the plaintiff received information February 08,2025, that the Defendant(s) sold the plaintiff, real estate property and home at an Auction.

A FIRST CAUSE OF ACTION, FOR AN JUDGMENT ORDER ON FRAUD

1. Pursuant, to S.C. code section33-15-101 (b)(8), The Defendant(s), filed a Summons and Complaint, seeking orders for a Foreclosure against the plaintiff real estate property, that the Defendant(s)Claim is the subject of this action.
The Defendant(s)move to the court with written documents, that were fraud alleges, making a claim of being owner of the plaintiff, Mortgage real estate property and Deceiving the Truth of Reference to the Master in Equity for Lexington County South Carolina.

2.Pursuant, to S.C. Code Section 33-15-101(b)(8), The real estate property describes by the Defendant(s)under the South Carolina of Laws (1976 as amended) and claim that is the subject of this action. The Defendant(s),also claim an order to the Lien of the Plaintiff, Mortgage, Possession of an Mobile/Manufactured Home; and Foreclosure of Mortgage.

Pursuant, the Defendant(s), electronic written up material document(s) said described false facts information, the plaintiff as owner related as described a Mobile/Manufactured Home bearing the Serial NO: 2004091TNA&B, on Property Conveyed to Linda Miller Hartley and James Hartley by Deed dated December 4, 2001 and recorded on December 18, 2001, and claim this is the subject of this action.

SECOND CAUSE OF ACTION FOR AN JUDGMENT ORDER ON FRAUD, REAL ESTATE
PROPERTY MORTGAGE FORECLOSURE

3. As unknown to the plaintiff, the Defendant(s) described a false fake Serial NO: and made a fault statement claim Linda Miller Hartley Deed over to James E. Hartley dated December 4, 2001, on property conveyed.

The plaintiff, Linda Miller Hartley, Deed for Karen E. Latimer Rushton (heirs Daughter) dated December 4, 2001, and recorded in the office for Lexington County, South Carolina on date December 18, 2001,

4. The Defendant(s), Deceiving the Truth of Reference to the Master in Equity for Lexington County South Carolina, seeking orders on incorrect property descriptions and a Lien on incorrect false information to a Mobile/Manufactured Home, that is NOT The subject of this action or the claim by Deed for James E. Hartley, that was not deed to property or recorded in the RMC office for Lexington County, South Carolina, or claim containing .99 net acre that does not Show a plat prepared for James E. Hartley.

THIRD CAUSE OF ACTION FOR AN JUDGMENT ORDER ON FRAUD, REAL ESTATE
PROPERTY MORTGAGE.

5. Pursuant to S.C. Code Section 33-15-101(b) (8), Plaintiff Shown Facts and this is the subject of this action and hereinafter, The Plaintiff is Entity to all Legal Rights of Security interests as the Borrower to a contract agreement April 9, 2002, together with National City Mortgage co/dba commonwealth Mid-Atlantic.

The Plaintiff, Holds an Mortgage Contract, that was enter into a promise Note dated April 9, 2002, amount of (\$83,700.00) dollars, with an understanding agreement, that the ("Lender") National City mortgage/dba, may Transfer the Note to received monthly loan payments, under the Note is called the ("NOTE HOLDER").

6. Pursuant, under a Mortgage Contract Agreement, with National City Mortgage co/db. April 09/2002.

(A) "Security Instrument", means together with ALL RIDERS. (heirs)

(B) "Borrower" (Plaintiff), Occupancy Rider Heirs,

(C) "Lender" National City Mortgage co/dba commonwealth Mid-Atlantic Mortgage Corporation.

(D) The Note States, that "Borrower" owes "Lender".

THIRD CAUSE OF ACTION,
MORTGAGE DEEDS

parties, ("Lender" and "Borrow (s)), Sections (G) Under the contract all Riders to the Security Instrument by "Borrowers" Occupancy (Heirs), that is the subject of this action, Real ESTATE PROPERTY.

Sections 15 (b) any such agreement under the Mortgage contract April 9,2002, will not effect hereinafter the "Borrow Rights to the Mortgage Security Instrument, The Homeowner Protection Act of 1998.

Sections (D) "Lender" is the mortgage under the Security Instrument, (The Mortgage).

7.The Defendant(s)to a Statement, that of a NON-Truth Fraud agreement of consideration that, the Plaintiff is willing to covariable all of the property to the Defendant(s), that is the subject of this action.

The Defendant(s), falsely incorrectly of FACTS to seek an order of Deference to Deceived the Master in Equity for Lexington County, South Carolina to gain an order of Sale, the Plaintiff, Real Estate Property, (The Mortgage) that was set up to Fraud. The Defendant(s) Describing incorrectly of UNREIATED information of Facts and pursuant, an order to sale the wrong Real Estate Property (Mortgage) to the contract April 9,2002.

Describing, the Plaintiff Real-Estate Property ("Mortgage") Security Instrument, Contract agreement dated April 9,2002, together with National City Mortgage co./dba Commonwealth Mid-Atlantic Mortgage, that is the subject of this action.

The Plaintiff, Real Estate (Property Mortgage), Construction Contract, by Norris Landmark, 1991 a Standard Build Modern Home, Contract to a Permanently foundation, including Brick Surrounding permanently half up of home, contract porches, roofing etc. Containing .99net acre Survey map area of home fronting on 141 Eisleben. Finance by Lexington State Bank June 12,1992-Record BK3232 page 277, BK2182 Page 076 NO: 23629, Assessment South Carolina, County of Lexington, Taxable #008400-03-042 TITLE of REAL ESTATE, that is the subject of this action.

Pursuant to the Federal and State Law and Civil enforcement violation to the Defendant(s) Federal-sign Act to electronic Signatures and records, description of a mortgage real estate property, deceiving incorrectly information of Truth of Reference to the Master in Equity for Lexington County, South Carolina to gain an order of Sale at an Auction, that is Recorded by

Deed Book 6874, page 25, the Plaintiff (Heirs, Daughter), Karen E. Rushton, and deceived the buyer at the Auction, that threaten the plaintiff from her own home, to move her out of her own home, to the Defendant(s) Fraud, that is the subject to this action.

Pursuant to S.C. Code Ann Section 15-53-20et.seg, National City Mortgage co./dba Commonwealth Mid-Atlantic Mortgage contract dated April 9,202, Security Instrument to a secure promise Note written Hereinafter, that is the subject to this action.

National city Mortgage co. /dba Commonwealth MID-Atlantic Mortgage, Contract April 9,2002.

1. Secure Promise Note, 99 net acres on the contract, that it WAS NOT SURVEY ON A Map describe covering (property), or describe on the contract, of any home to the mortgage. That is the subject of this action

FOURTH CAUSE OF ACTION

8. On April 16- 2002, National City Mortgage Register of Deeds, together ("Plaintiff"),

In correct information, Loan WAS NOT Subject to a Loan Modification agreement dated August 16,2012.

9. On dated May22,2008, National City Mortgage, to a Legal Action claims allegation under federally insured Loan ACT SETTLE of Attorney General award the (\$ 4.6 MILLION) Dollars paid out to claims in.

National City Mortgage co./dba, March 19,2010, went in with PNC Bank, National Association s/b/m national City Mortgage co dba.

Contract Agreement April 09,2002, ("Lender") Nation City Mortgage, Sent Notice Letter informing the (: Borrow") Transferring Mortgage Note, to Green Tree Servicing, LLC, ("NOTE HOLDER").

Green Tree Servicing LLC, Assignment Forged Deeds transactions, on Plaintiff property Deed of (Fraud) and left a trail THAT CLAIM TO BE NOTE HOLDERS, WITH OUT THE NOTICES LETTER From the ("Lender") National City Mortgage and without the Plaintiff Knowledge, suspicious after, Green Tree Servicing LLC., The Plaintiff reporter, there Fraud Action, to C.f.p.b. National City Mortgage received mortgage loan payments, start June 01,2002- November1,2009, (90) Mortgage Loan payments.

South Carolina Homeownership Lending Program, (CREDABILITY) approved an Award for the ("PLAINTIFF") IN THE AMOUNT OF (\$36,000,00) Dollars, paid the Principal and interest toward the Mortgage Loan and lowered the interest rate to 4.125% from 8.275% interest rate, that lower the Mortgage loan payments to (\$559.60).

10. March 19/2010, PNC Bank, National Association sb/m and National City Mortgage co/dba commonwealth Mid-Atlantic Mortgage (Assignor), convey, grant, sell, transfer the described Mortgage Deed Recorder 04/16/2002, under National City Mortgage, made by James Hartley and Linda Miller Hartley, Registrar of Deeds of Lexington, South Carolina in the same Book 7145, page 68.

Green Tree Servicing, LLC, IS SCRATCHED OUT TO RECORDER OR REGISTRAR OF DEEDS, ("NOTE HOLDER"), Transfer by National City Mortgage ("Lender") November 2/2009.

Green Tree Servicing LLC, To Pay ("Borrow") to \$48, Million for Loans from 2010 to 2014.

On April 21/2015, The BUREAU AND the Federal Trade Commission, FTC TOOK ACTION against Green Tree for mistreating Borrowers Mortgage Loans.

The ("Lender ") Stated in the contract, of a transfer, "NOTE HOLDERS" are Hereby to inform the "Borrow "BY MAIL Notice, the effective date of transfer accepting payments, address and the new Servicer. Section 6 of the Real Estate Act (RESPA) (12u.s.c.2605), Security instrument contract (Section 9b), Homeowner Protection Act of 1998 or any other Law.

11. Ditech Financial LLC, re-branding with Green Tree Servicing in 2015,

On this Date 31 Day of January in the year 2020, the undersigned C/O Nationwide Title Clearing Inc. hereby acknowledged, DITECH FINANCIAL LLC, F/K/A Green Tree Servicing LLC, Mortgage Dated 04/09/2002, made by James E Hartley and Linda Miller Hartley to National City Mortgage DBA COMMONWEALTH MID-ATLANTIC Mortgage and recorded 04-162002 in the Recorded or Register of Deeds of Lexington County, South Carolina in Book 7145 and page 68.

BREACH OF CONTRACT;

Mortgage Holders Filed a Legal Action, in 2014, against Green Tree Servicing LLG, and Green Tree Servicing LLC, pay out SETTLEMENT to Borrowers, (\$48, MILLIONS) Dollars to loans from 2010 to 2014 to (Fraud).

10. Assignment of Mortgage, Ditech Financial LLC F/K/A/ Green Tree Servicing LLC, the Mortgage to New Residential Mortgage LLC. Forged their name to the Plaintiff Property Deed, they have NO legal Rights to be on the Plaintiff property Deed.

11. The Assignment dated September 10, 2021, The Defendant(s) FORGED THEIR NAME TO THE Plaintiff Property Deed and Register of Deeds for Lexington County, that is the subject to this action. The Defendant(s) set up Rushmore Loans Managements, as a ("NOTE HOLDER"), July 01, 2021, EMBEZZLE THE MONEY, from the PLAINTIFF Mortgage Loan Account, and was reported to the C.f.p.b., Legal Actions filed on Fraud.

Rushmore Loan Embezzle, the Escrow Account, Having NO HOMEOWNER INSURANCE, THEY DID NOT PAY, TAXES. They set up the Plaintiff, Mortgage Loan Account, payments that all payments were made plus, the Escrow account to a NON-PAYMENT. They EMBEZZLE THE MONEY, PLUS APPLY NOTHING TO THE Principal or interest on the account, C.f.p.b. Filed Legal Action, for over 100 Mortgage Holders, that Rushmore Loan EMBEZZLE Homeowners Mortgage loan Account.

12 The Defendant(s) FORGED THEIR NAME to the plaintiff, Property Deed and Register of Deed, the THIRD TIME, on the Plaintiff, Real Estate Property (Mortgage), that is the subject of this action, and set up Servicing Corporation LLC, as ("NOTE HOLDER"). The Defendant(s) Did Not, add these ("NOTE HOLDER") NAMES above to their fraud on their legal Action, that is the subject to this action. The Defendant(s), set up Servicing Corporation LLC, to set up the Plaintiff, Mortgage Loan Account, (Real Estate Mortgage Property), to Foreclosure of Mortgage. Servicing Corporation LLC, Received January 01-2024, two payments), and then February 01, 2024, March 01, 2024, April 01, 2024, May 01, 2024, that they were HOLDING SIX Loan Payments, plus the Defendant(s), that this is the subject to this action of (Fraud).

The Defendant(s) Filed May 2, 2024, FORECLOSURE ON THE Plaintiff Real Estate Property (Mortgage) and then RETURN THE CHECKS June 10, 2024, that the Defendant(s) stamp 10 on top of the checks.

13. The Defendant(s) HAVE NO LEGAL RIGHTS, TO THE Plaintiff REAL ESTATE PROPERTY, (MORTGAGE), that this is the subject to this action of fraud.

A CAUSE OF ACTION ORDER OF FRAUD

14. On SEPTEMBER 10, 2021, the Defendant(s) FORGED ASSIGNMENT OF MORTGAGE DEEDS into their name, transferring as ownership of the Plaintiff, Real Estate Property (Mortgage), that is the subject of this action.

15. On November 8 2021, the Defendant(s) FORGED ASSIGNMENT OF MORTGAGE DEEDS into their name, transferring as ownership of the Plaintiff, Real Estate Property (Mortgage), that is the subject of this action.

16. Pursuant to the South Carolina Law Foreclosure Mortgage, that is the subject of the action. The Defendant(s) of Multiple Violation of Fraud Legal Action Suits Pursuant to gain consumer Real Estate Property (Mortgage), arranging Mortgage Foreclosure, Property Fraud, Real Estate Fraud, dated since 2005.

17, Pursuant to the Statutory Laws of South Carolina, the Defendant(s) Violation with unclean hands are not allowed to enter into court if they have Violated the Law, that is the subject of this action.

18. Pursuant under the (SASC) Plaintiff Mortgage contract, Trust Agreement dated April 9 2002, National City Mortgage, ("Lender"), Not the Defendant(s), that is the subject of this action. The Defendant(s) organize and set forth arranging, ("NOTE HOLDERS") COLLECTING the loan payments and set forth arranging the Mortgage account NON-Payment and set forth fraud to foreclosure seeking orders to the Plaintiff Real Estate Property, (Mortgage).

19. The Defendant(s), seeking orders, to Federal-sign Act, Fraud to electronic signatures and records, deceive falsely incorrectly Truth of Reference to the Master in Equity for Lexington County, South Carolina, that is the subject of this action, and made a statement to the Master in Equity, the plaintiff cannot be found within the State of South Carolina, to seek an order for service by publication, instead of service several other ways, that include e-mail, text, Family, next door.

20. Orders, the Defendant(s) received of Fraud.

Mortgage foreclosure, Service by publication, Sale of real estate property,

CAUSE OF ACTION ORDER ON FRAUD REAL ESTATE PROPERTY MORTGAGE,
EVIDENES PROOF ON FACTS.

WHEREFORE; The Plaintiff, prays to the court of Reference to the Master in Equity for Lexington County, South Carolina, for judgment orders against the Defendant(s) on ground of Fraud, under Disclosure Act code of Civil Procedure in 1870.

Orders on Evidences facts, that is the subject to this action.

The Plaintiff, is seeking Orders Awarded Compensatory Damages against the Defendant(s) to pay the Plaintiff, amount of (\$44,000.00) Thousands of Dollars.

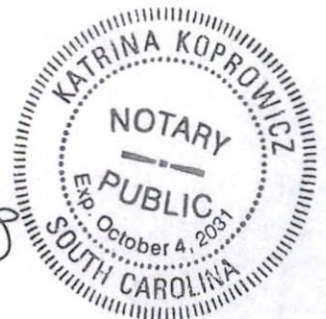
1. Deception ("NOTE HOLDERS") Two Transfers 2021, 2022, 2023, 2024
2. Defendant(s), Holding loan Checks, Two payments January, February, March, April, 2024,
3. Defendant(s), Embezzle Escrow Loan Payments paid, June 2022, 2023, 2024.
4. Defendant(s), NON-Payment (fraud) Homeowner Insurance, Nonpayment on insurance claims, No Homeowner Insurance 2022, 2023, 2024, Embezzle Escrow money paid,
5. Defendant(s), NON-Payment Real Estate property (Mortgage) Taxes paid, embezzle payments,

The Plaintiff, is seeking Orders Awarded Compensatory Damages against the Defendant(s) to pay the Plaintiff, in the amount of (\$150,000.00) Thousands of Dollars.

1. Defendant(s) Embezzle Loan Payments Paid 2019, 2020, 2021, 2022, 2023, Return 2024,
2. Defendant(s) Deception Fraud, Foreclosure SALE May 2, 2024, HOME STEALING,
3. Defendant(s) Forged Document Recorder of Deeds, September, 2021,
4. Defendant(s) Forged Document Recorder of Deeds November, 2021,
5. Defendant(s) Deception Fraud, SALE INFORMATION on (Heirs Recorder of Deed),
6. Defendant(s) Deception Fraud Claim as owner to plaintiff, mortgage property 2019 and 2020.
7. Defendant(s) Deception Fraud, SALE Wrongfully INFORMATION on Plaintiff, Real Estate mortgage, Home.
8. Defendant(s) Deception, Service by Publication,
9. Defendant(s) Filing Legal Action of Fraud,

Linda Hartley

[Signature]



Appeared before me on 3 of August, 2025

Linda Hartley who attests the information in motion is true