

STATE OF SOUTH CAROLINA  
COUNTY OF LEXINGTON

IN THE COURT OF COMMON PLEAS  
ELEVENTH JUDICIAL CIRCUIT

Linda Hartley,  
Plaintiff,

Case NO: 2025-CP-32-00616

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MAR 11 2026

SC Court of Appeals

Vs.

ORDER GRANTING MOTION DISMISS

USBank Trust National Association as  
Trustee for BKPL-BG Holding Trust,  
Defendant,

DEFENDANT WITHOUT PREJUDICE

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This matter came, before this court on Plaintiff, Motion to Dismiss the Defendant(s). A hearing on this matter was held on January 27,2026, where the Plaintiff, appeared prose and the Defendant was represented by John Ferrell, Esquire.

FACTS AND EVIDENCES,

On February 12,2025, Linda Hartley "Plaintiff" filed this complaint alleging of a fraud foreclosure Auction Sale and embezzlement the Plaintiff, Mortgage payments against the Defendants. On May 02,2024, the Defendant US Bank Trust National Association as Trustee for BKPL-BG Holding Trust, had not served the Plaintiff with the Summons and Complaint or Served to any knowledge, Rights to Cure a debt owing money on a promise Note, the (FDCPA) federal law.

The Plaintiff, was prepared to enter all evidences to the court hearing January 27,2026, my apologize to the court appeared prose and follow the court Ruling, wait for the Judge to question or ask?

The Defendant, pointed out October 30,2024, that the Plaintiff underlying foreclosure matter adjudicated Correction Case NO:2025-CP-32-00616, filed February 25,2025.

## STANDARD OF REVIEW, FACTS AND EVIDENCES,

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On April 09,2002, Linda Miller Hartley, "Plaintiff, enter into a Mortgage Contract Agreement with National City Mortgage co.dba Commonwealth Mid Atlantic Mortgage, a Promise Note agreement, of \$83,700.00 dollars, to pay the "Lender" NCM, the Principal, Plus interest. The Borrow "Plaintiff "to make monthly payments, beginning June 01,2002, to National City Mortgage co.dba "Lender".

Enter into the Contract, the "Lender" National City Mortgage co.dba may transfer this Note, that is called "NOTE HOLDER".

On October 01,2009, PNC Mortgage (Bank), become part of National City Mortgage co.dba and change the company new legal name, PNC Mortgage National Association National City Mortgages co.dba Commonwealth Mid-Atlantic Mortgage, it does not change the plaintiff, service of Mortgage loan.

Effected, November 07,2009, the "Lender" National City Mortgage co.dba, Transfer as "NOTE HOLDER" Green Tree Servicing LLC.

National City Mortgage co.dba, received monthly Mortgage payments included the escrow, June 01,2002 through October 01,2009, in the total amount of \$83,321.43, Interest and Principal paid in the total amount of \$74,911.65, Escrow amount paid of \$8,409.78, received from the "Plaintiff".

National City Mortgage co.dba, Recorded Mortgage Deed, April 16,2002, and Recorded Mortgage Deed April16,2002, Commonwealth Mid- Atlantic Mortgage National City Mortgage,

PNC Mortgage National Association s/b/m National City Mortgage co. dba Commonwealth Mid-Atlantic Mortgage, THE EVIDENCES WILL SHOW, THE NEW NAME WAS NOT RECORDED ON THE PLAINTIFF MORTGAGE DEED, OR Registrar of Deeds, for Lexington County.

Green Tree Servicing LLC, Legal Action, 2013, pay out \$63. Million dollars, Green Tree Servicing LLC, fraud recorded deed Mortgage, as a investor instead of a "NOTE HOLDER",

The Defendants, claim, that Green Tree Servicing LLC, writing up a loan Modification, March13,2012, for the "plaintiff", the evidence will show CREDABILITY SERVICE ASSIST, AWARD AMOUNT OF \$36,000.00 Thousands Dollars, May 27, 2015, and adjusted interest Rate to 4.150%.

Green Tree Servicing LLC, received (62) Mortgage loan payments, Escrow in the amount of \$53,424.67, \$46,185.31 principal & interest \$7,239.36, beginning November 07,2009 through December 01,2014,

Evidence, Ditech Financial LLC, forgery their Name on the" Plaintiff" Mortgage Deed and recorded of registrar of deed for Lexington County, January 01,2015.

DITECH Financial LLC, F/K/A and Green Tree Servicing LLC, received \$59,031.15 Total amount of Mortgage Loan payments, \$55,647.15 Principal and \$3,384.00 Escrow paid January 01,2015 through February 03, 2019.

The Defendants, US Bank Trust National Association as Trustee For BKPL-Holding Trust, illegally forged their name on the "Plaintiff" Mortgage Deed as New Residential Mortgage LLC and assigned themselves under, the plaintiff Mortgage of a Deed and recorded in the office of the Register of Deeds for Lexington County on September 10,2021, in the Book 20964, page3522.

The Defendant, US Bank Trust National Association as Trustee of the BKPL-EGS I Trust, illegally forged their name on the "Plaintiff" Mortgage Deed, forged a fake Deed in the name For Good and Valuable Consideration and claim as owner of all rights interest, liens, Mortgage Note and recorded in the office of the Register of Deeds for Lexington County in the Book7145 page 68by Meridian Asset Services, LLC, November 08,2021.

Foreclosure and Mortgage Sale Fraud,

Lexington County Sheriff Department Investigation Report, Case NO: 24-020590

Defendant, USBank Trust National Association as Trustee for BKPL-EG Series I Trustee, forged Mortgage September 10 2021, made by the Plaintiff, Mortgage Contract April 09,2002, NCM, as new name changes ASSIGNMENT OF MORTGAGE, of a TRANSFER Sale Mortgage set over to, Investors Loan NO:64173,

NEW Residential Mortgage, NewRez LLC F/K/A, and Shellpoint Mortgage Servicing. Under the Defendants, transfers as "NOTE HOLDERS" And together received in the amount of \$ 54,000.00 thousands dollars, Mortgage Loan Payments, included the escrow.

Defendant, US Bank Trust National Association as Trustee for BKPL-EG I Trustee, forged Mortgage November 08 2021, made by the Plaintiff, Mortgage Contract April 09,2002, MCM as new name changes ASSIGNMENT OF MORTGAGE, FOR GOOD AND VALUABLE CONSIDERATION, of a TRANSFER Sale Mortgage set over to USBank Trust National Associations Trustee of the BKPL-EG Series I Trust Document/Instrument No: 2002020240 in the Recording District of Lexington, S.C. 29070 In Book/Liber/Volume 7145 , page 68,Described the Plaintiff, Mortgage Property 141 Eisleben Rd. Leesville, 29070. A Transfer Mortgage Sale to MERIDIAN ASSET SERVICES LLC. A Transfer Mortgage Sale to Rushmore Loan Management as "NOTE HOLDER" Received (\$19,632.93) Mortgage Loan Payments plus over (\$ 1,900.00) Hundred Dollars, Escrow payments of NON-Payment Insurance, Taxes. And Transfer Mortgage Sale to Servicing Corporation as "NOTE HOLDER "and Identify as an Employees Agents, and Identify as a Debt Collect, attorney, Received November and December Mortgage Loan payments 2023, cash and applied, to Rushmore Management Servicing LLC.

Servicing Corporation, and the Defendant US Bank Trust National Association Received (13) Mortgage Loan payments, the year 2024. Servicing Corporation, with held the 7 checks for payments and return them uncashed June 10,2024, after a Fraud Foreclosure was set up May 02,2024.

The Defendant(s), US Bank Trust National Association and McMichael Taylor Gray LLC, are involved together that, Two (2) forged Mortgage Deeds, Selling the Plaintiff Mortgage to Five (5) Investors and set up the, Plaintiff Mortgage to a Foreclosure. A Mortgage contract with NCM that was payed for May 01,2022, a Twenty-year Mortgage Loan. That's Why the Plaintiff wasn't Severed? The Defendants Described Property, that the owners are Karen E Latimer Stone and Stephen D. Stone, (Family), that was put up to an Auction Sale.

The Defendants, falsely deceived, the incorrectly Truth of Reference to the Master in Equity for Lexington County, South Carolina, 4.

ALL EVIDENCES, WILL ENTER IN THE COURT HEARING,

Linda Hartley,  
Plaintiff,

*Linda Hartley*

*Summer Smith*

