

IN THE COURT OF APPEALS  
STATE OF SOUTH CAROLINA

**Sophia V. Brown,**

Appellant,

v.

**Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc.,  
Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS10,**

Respondent.

South Carolina Court of Appeals

Case No. 2026-000925

**RECEIVED**

MAY 04 2026

SC Court of Appeals

## **STATEMENT OF ISSUES ON APPEAL**

1. Whether the lower court erred in entering a foreclosure judgment where the plaintiff failed to present admissible evidence establishing standing, ownership of the note, or a valid chain of title.
2. Whether the lower court erred in admitting or relying upon documents that were not properly authenticated, lacked foundation, or were unsupported by testimony from a witness with personal knowledge.
3. Whether the lower court erred by excluding or failing to rule on Defendant's motions, objections, and proffered exhibits, therefore denying Defendant a meaningful opportunity to be heard and preventing proper appellate review.
4. Whether the lower court erred in adopting factual findings and legal conclusions that were not supported by evidence presented at the hearing.
5. Whether the lower court exceeded the scope of the remand by issuing new factual findings, new calculations, and new determinations not authorized by the appellate mandate.
6. Whether the lower court erred in entering the Stay/Bond Order where the bond amount, rental-value calculations, tax and insurance figures, and 36-month projections were unsupported by evidence, not based on statutory authority, and inconsistent with S.C. Code Section 18-9-170.
7. Whether the lower court erred by adding alleged rental value, to the foreclosure judgment amount, thereby inflating the deficiency and imposing obligations not permitted by statute.
8. Whether the lower court erred in adopting the plaintiff's proposed order verbatim, including findings not made at the hearing, calculations not supported by the record, and conclusions inconsistent with the evidence.
9. Whether the lower court erred in imposing a bond deadline and conditions that were punitive, unsupported by evidence, and that effectively denied Defendant access to appellate review.

**10. Whether the cumulative effect of the lower court's procedural discrepancies , unsupported findings, and failure to rule on pending motions deprived Defendant of due process and requires reversal.**

## CORRECTED PROOF OF SERVICE

I, **Sophia V. Brown**, certify that on May 4, 2026, I served the following documents related to the above-referenced appeal:

1. **Corrected Motion to Stay Enforcement Pending Appeal**
2. **Corrected Petition for Supersedeas**
3. **Corrected Supplemental Notice of Appeal**
4. **Statement of Issues on Appeal**
5. **Motion to Waive Appellate Fees (including alternative request for 60 days to pay if waiver is denied)**
6. **Corrected Proof of Service (this document)**

Service was made by depositing true and correct copies of each document in the United States Mail, addressed as follows:

**Chad W. Burgess**

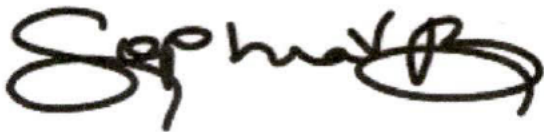
Counsel for Deutsche Bank Trust Company Americas  
Brock & Scott, PLLC  
WESTPARK CENTER  
3800 Fernandina Road, Ste 110  
Columbia, SC 29210

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I further certify that, pursuant to **Rule 262(c)(3), SCACR**, I am not permitted to serve attorneys by email, and therefore service was made **exclusively by U.S. Mail**.



**Sophia V. Brown**

Appellant Pro Se  
1140 Woodruff Rd., Ste. 106-155  
Greenville, SC 29607

May 4, 2026

## Cover Letter for Deficiency Corrections

Re: *Sophia V. Brown v. Deutsche Bank Trust Company Americas*

Appellate Case No. 2026-000925

### Submission of Corrected Filings to Cure Deficiencies

Dear Clerk of Court:

I am submitting the enclosed **corrected appellate packet** to cure the deficiencies identified in the Court's May 1, 2026 correspondence regarding the following filings:

- Motion to Stay Enforcement Pending Appeal
- Petition for Supersedeas
- Supplemental Notice of Appeal

I have **resubmitted the entire appellate packet originally filed on April 30, 2026**, with the following corrections:

1. **Corrected Proof of Service** reflecting service by U.S. Mail in compliance with Rule 262(c)(3), SCACR.
2. **Corrected copies** of the Motion to Stay Enforcement, Petition for Supersedeas, and Supplemental Notice of Appeal, each accompanied by the corrected Proof of Service.
3. **Request for relief** regarding the required filing fees

These corrected materials are being provided so that both the Court and counsel have complete and compliant copies of each filing.

Please let me know if any additional information or further corrections are required.

Respectfully submitted,



**Sophia V. Brown**

Appellant, Pro Se

1140 Woodruff Rd., Ste. 106-155 Greenville, SC 29607

[Newcandy2010@gmail.com](mailto:Newcandy2010@gmail.com) | 864-325-6354 | **May 4, 2026**

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