

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,

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 Devisees 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 Devisees 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 Devisees of Michelle Huggins; Deceased, theirs heirs, Personal Representatives, Administrators, Successors and Assigns, and all other persons entitled to claim through them; any other Heirs-at-Law or Devisees of Buster Huggins Sr., Deceased, theirs 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

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SC Court of Appeals

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 DISMISSAL

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SC Court of Appeals

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

Rogers Townsend & Thomas, PC
220 Executive Center Drive
Columbia, S. C. 29210
Respondent Attorney,
Sean M. Foerster, (SC Bar #
77644)
(803) 771-7900

The South Carolina Court entered an Orders on December 17, 2013, Ordering That within 30 days the Appellant did file on January 17, 2014 the Second Amended Record on Appeal and the Second Amended Final Brief as Ordered by this Court. The Appellate on January 17, 2014 hand delivered to the office of Rogers & Townsend Located at 220 Executive Center Drive, Columbia, SC the Attorney for Respondent A copy of the Second Amend Record on Appeal and a copy of the Second Amend Final Brief that filed and clocked by the South Carolina Court of Appeal in accordance to The 30 days Order of this Court.

That the Appellant on January 17, 2014 Complied and completed all four tasks that was Ordered by the South Carolina Court of appeal to avoid dismissal Foreclosure Action 06/2859.

That the Appellant included in the Designation of Matter the Original Sealed and Clean version of the Trail Transcript. To my understanding I'm in compliance Of SCACR rules One Original Transcript.

That the Appellant also removed all the documents that was essential in this action My attorney choose not to submit these documents to the lower Court on the day of The Trail Hearing February 28, 2012.

That the Appellant understanding of 209 ... Rule 210 (c) was to include all matters Designated by the parties, the second amended Record on Appeal do not included any matters that were not presented to the lower court.

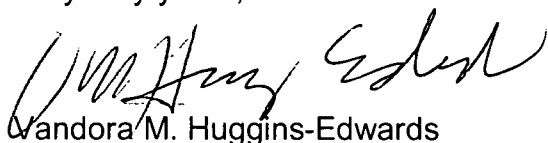
That with all the respect due to the South Carolina Court of Appeal, I the Appellant has done what was requested by this court and I will continue to do what the Court request of me in this action.

That the Appellant think that it would be injustice for the South Carolina Court of Appeal to dismiss this action due to the underlying fact that respondent attorney

have no grounds for dismissal of this action.

That the Appellant respectfully request that this court to Rule as they see in the eyes
of the Law.

Very truly yours,

A handwritten signature in black ink, appearing to read "Wandora M. Huggins-Edwards". The signature is written in a cursive style with a large initial "W".

Wandora M. Huggins-Edwards

1218 Gunn Avenue

Charleston, S. C. 29407

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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
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Timothy Nelms; Jennifer Nelms; Michael A. Brown; Demetrius Huggins Nelms; a
minor, Darius Simmons; a minor, Dondre Simmons; a minor; Reginald Huggins;
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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, theirs 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, theirs heirs, Personal Representative,
Administrators, Successors and assigns, and all other persons entitled to claim
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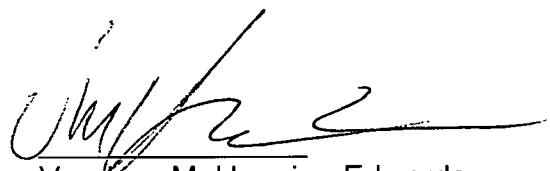
Motors Acceptance Corporation; White Directory Holding Carolina, Inc. d/b/a The Talking Phone Book; Monogram Credit Card Bank of Georgia; Michael Twitty; Deborah Twitty; The United States of America, by and through its agency, The Internal Revenue Service; and John C. Bigler..... Defendants,
Of Whom Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards _____ Appellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served a copy of the Motion to Deny Dismissal of Appeal to the Respondent Attorney on February 14, 2014 BY depositing a copy of each in the United States Mail postage prepaid, addressed to the following party of record:

Sean M. Foerster
Rogers & Townsend & Thomas PC
P. O. Box 100200 (29202)
220 Executive Center Drive
Columbia, South Carolina, 29210
(803) 771-7900

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



Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, South Carolina
(843) 801-7392

The Appellant-PRO SE

Please check and
return a copy

Thank you

Vandora M. Gray

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