

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Case No. 2006-CP-10-2859
Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2005-R4CGM under the Pooling and Servicing
Agreement dated as of May 1, 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 M. Huggins;
Michael Huggins; Donnell Huggins; Samuel
Huggins; Ira Huggins a/k/a 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 Devises of
Ricky 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, 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 Buster Huggins, Sr., Deceased, their heirs, Personal
Representatives, Administrators, Successors and

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SC Court of Appeals

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; also any persons
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 under a disability
being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor
Credit Company; General Motors Acceptance Corporation;
White Directory Holdings 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 is theAppellant.

**RESPONDENT'S REPLY TO
APPELLANT'S RETURN TO RESPONDENT'S MOTION TO
DISMISS THE APPEAL**

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(803) 771-7900
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Attorneys for Respondent Deutsche Bank
National Trust Company, as Trustee of
Ameriquest Mortgage Securities, Inc., Asset
Backed Pass Through Certificates, Series
2005-R4CGM under the Pooling and
Servicing Agreement dated as of May 1,
2005, without recourse

February 19, 2014

Respondent Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under the Pooling and Servicing Agreement dated as of May 1, 2005, without recourse (“Deutsche Bank”) respectfully submits this Reply to the “Motion to Deny Respondent Dismissal” of Appellant Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards (“Vandora Huggins”).

FACTS

Deutsche Bank incorporates by reference the facts set forth in its Motion to Dismiss the Appeal filed on February 5, 2014. The basis of the motion is that Vandora Huggins failed to make several of the corrections to the Record on Appeal required by the Court’s Order of December 17, 2013. The motion sets forth those deficiencies in detail.

Vandora Huggins has now served Deutsche Bank with a “Motion to Deny Respondent Dismissal,” which it construes as being a Return to the Motion to Dismiss the Appeal.

ARGUMENT

Vandora Huggins’s Return argues that she “complied and completed the four tasks” required by the Order of December 17, 2013, but fails to specifically refute that she omitted the following documents from the Second Amended Record on Appeal that Deutsche Bank listed in its Designation of Matter:

- Complaint filed on July 24, 2006;
- First Amended Lis Pendens, Summons, & Complaint filed on September 10, 2008;

- Second Amended Complaint filed on December 9, 2010—it is missing the last page;
- Plaintiff's Notice of Motion and Motion for Partial Summary Judgment filed on January 5, 2012—Vandora Huggins included only an unfiled copy of these documents. Deutsche Bank requests that filed copies of the motion be included in the record on appeal. Further, the copy of the motion that she has included in the Second Amended Record on Appeal contains handwritten markings made by Vandora Huggins that are prejudicial to Deutsche Bank and impermissible under the South Carolina Appellate Court Rules. (Second Amended R. p. 138.)
- Trial Transcript from the trial held on February 28, 2012—the copy of the transcript contained in the Second Amended Record on Appeal contains handwritten comments, notes, and markings made by Vandora Huggins that are prejudicial to Deutsche Bank and impermissible under the South Carolina Appellate Court Rules. (Second Amended R. Vol. I pp. 247, 249, 250, 253, 254, 260, 261, 275, 279, 282, 290, 291; Vol. II pp. 265, 275, 276, 277, 282, 283, 294, 305, 306, 311, 314.) This must be substituted with a “clean” version of the transcript.
- Copies of all exhibits admitted into evidence at trial—several of the copies of these exhibits included in the Second Amended Record on Appeal are still missing top and bottom portions of the pages due to poor photocopying by Vandora Huggins. (Second Amended R. pp. 329 – 335, 367 – 407, 420 – 462,

505 – 520.) Deutsche Bank requests that complete and better copies of the exhibits be included in the Record on Appeal.

The Return fails to specifically refute that she included the following documents in the Second Amended Record on Appeal that were never presented to the lower court:

- Pages 7 – 14 of the Second Amended Record on Appeal include what appears to be some kind of preamble or additional appellate brief by Vandora Huggins not previously served or filed in this appeal. No such further brief is permitted under the South Carolina Appellate Court Rules. Further, it is improper to include appellate briefs in the Record on Appeal.
- Pages 15 – 16 include a Proof of Service of the original Record on Appeal and Initial Brief of the Respondent from September 24, 2013. Aside from this proof of service making the false representation that Vandora Huggins would have served the Initial Brief of the Respondent, it is not properly included in the record on appeal.
- Pages 17 – 36 include a third version of the Brief of the Appellant which has never been served or filed by the Appellant. Deutsche Bank had never seen this version of the Brief of the Appellant before it appeared in the first version of the Record on Appeal submitted by Vandora Huggins. Further, the Court specifically ordered her not to include her brief in the record on appeal. (Order p. 3.)
- Page 73 includes a letter that was not designated for inclusion in the record by either Vandora Huggins or Deutsche Bank, and this letter is irrelevant to this appeal.

- Pages 132 – 135 include a letter that was not designated for inclusion in the record by either Vandora Huggins or Deutsche Bank, and this letter is irrelevant to this appeal.
- Pages 221 – 224 include one of the Notices of Appeal filed by Vandora Huggins in this case. It is improper to include this document in the Record on Appeal.
- Pages 225 – 229 include a letter that was not designated for inclusion in the record by either Vandora Huggins or Deutsche Bank, and this letter is irrelevant to this appeal.
- Pages 230 – 237 include an incomplete and unfiled version of the Affidavit of Attorney’s Fees submitted by Deutsche Bank’s counsel at trial. If Vandora Huggins wants this affidavit included in the record, it needs to be substituted with a filed and complete copy.

Finally, the Return fails to specifically refute that the Second Amended Record on Appeal further fails to comply with the South Carolina Appellate Court Rules as follows:

- The documents included in the proposed Second Amended Record on Appeal are not arranged as required under the rules. Rule 210(c), SCACR (“Matter contained in the Record on Appeal shall be arranged in the following order: the title page, index, orders, judgments, decrees, decisions, pleadings, transcript, charges, exhibits and other materials or documents, and a certificate by appellant.”).
- The pages of the proposed Second Amended Record on Appeal are not consecutively numbered, which will make it difficult for Deutsche Bank to

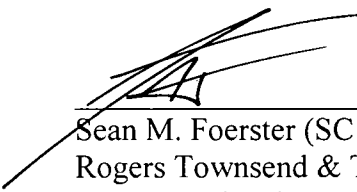
cite to the record in its Final Brief. Rule 210(c), SCACR (“Each page of the Record on Appeal shall be numbered consecutively beginning with the index.”).

Aside from the bald assertions in the Return that she included the “original sealed and clean version of the trail [sic] transcript” (Return p. 3) and did not include “any matters that were not presented to the lower court” (Return p. 3), the documents included within the proposed Second Amended Record on Appeal show otherwise. Therefore, the Return presents no valid arguments that would excuse Vandora Huggins for failing to comply with the Order of December 17, 2013.

CONCLUSION

At this point in the appeal, Vandora Huggins has demonstrated a pattern of ignoring the directives of the Court and violating the South Carolina Appellate Court Rules¹. Deutsche Bank understands and appreciates the wide birth given to *pro se* appellants by the Court, but at some point there should be consequences for these repeated violations. Therefore, Deutsche Bank respectfully asks the Court to dismiss this appeal. In the event that this appeal is not dismissed, Deutsche Bank respectfully requests relief from having to serve and file its Final Brief of the Respondent until the deficiencies in the Second Amended Record on Appeal are corrected.

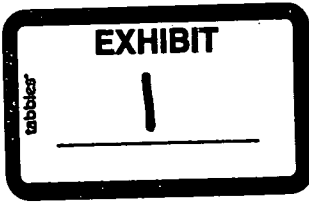
Respectfully submitted,



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Attorneys for Respondent Deutsche Bank
National Trust Company, as Trustee of
Ameriquest Mortgage Securities, Inc., Asset
Backed Pass Through Certificates, Series
2005-R4CGM under the Pooling and
Servicing Agreement dated as of May 1,
2005, without recourse

¹ Please see the attached Exhibits 1 through 8, which include 6 letters from the Clerk of Court issued to Vandora Huggins during this appeal directing her to fix various errors in her appeal, the Order of January 7, 2013, dismissing this appeal for noncompliance with the South Carolina Appellate Court Rules and the Clerk of Court's directive, and the Order of December 17, 2013, at issue in this motion.



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMTER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
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August 23, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your notice of 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:

- The accompanying proof of service is not in compliance with the SCACR. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- We have received two notices of appeal. Please provide an explanation to the different dates you received the written notice of entry of the order.

Very truly yours,

A handwritten signature in cursive script that reads "Jenny A. Kitchings".

CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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August 23, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your request for extension of time, 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:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script that reads "Jenny A. Kitchings".

CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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August 21, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your transcript request, 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:

- The accompanying proof of service is not in compliance with the SCACR. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- A copy of this document was not provided to the Office of Court Administration as required by the SCACR. The address for Court Administration is 1015 Sumter Street, Suite 200, Columbia, SC 29201.
- Please provide the date you requested the transcript.
- Please provide the name and address of the person you requested the transcript from.

Very truly yours,

Handwritten signature of Jenny A. Kitchings in cursive script.
CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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November 06, 2013

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your 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:

- The binding does not comply with Rule 267(d), SCACR.
- The document is improperly paginated. Specifically, the pages of the record on appeal are not numbered consecutively, as required by the SCACR.
- The document is not accompanied by the required certificate of counsel.

Very truly yours,

Handwritten signature of Jenny A. Kitchings in cursive script.
CLERK

cc: Sean Matthew Foerster



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK
V. CLAIRE ALLEN
DEPUTY CLERK

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November 06, 2013

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your appellant's final brief, 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:

- The title does not comply with Rule 267(a), SCACR. Specifically, the title of your brief should not include the title for the record on appeal. These are separate documents that should be filed separately.
- The number of copies provided is not in compliance with the SCACR. Please provide fourteen (14) bound copies of the appellant's final brief.
- The document is not accompanied by the required certificate of counsel with regard to Rule 211 (b), SCACR.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Sean Matthew Foerster



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK
V. CLAIRE ALLEN
DEPUTY CLERK

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December 10, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your amended initial brief of appellant, 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:

- The initial brief is not accompanied by a designation of matter to be included in the record on appeal. You must file a motion to file the designation of matter late along with the designation of matter.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland

The South Carolina Court of Appeals

Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgages Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under the pooling and Serving Agreement dates as May 01, 2005 without recourse, Respondents,

v.

Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards; Sylvia Anne Lawrence a/k/a Sylviatte Anne Lawrence; Glenn M. Huggins; Michael Huggins; Donnell Huggins, Samuel Huggins; Ira Huggins a/k/a 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 Ricky 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, 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 Buster Huggins, Sr., Deceased, their heirs, Personal Representatives, 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; also any persons 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 under a disability being a class designated as Richard Roe; South Carolina Department of Revenue; Safeway Finance; Ford Motor Credit Company; General Motors Acceptance Corporation; White Directory Holdings 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 is the Appellant.

Appellate Case No. 2012-212524

The Honorable Mikell R. Scarborough
Charleston County
Trial Court Case No. 2006CP1002859

ORDER

Appellant has failed to serve and file the designation of matter, as required by Rule 209 of the South Carolina Appellate Court Rules. Accordingly, this matter is dismissed. The remittitur will be sent as provided by Rule 221(b), SCACR.

FOR THE COURT

BY V. Claire Allen, Deputy
CLERK

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Columbia, South Carolina

cc:

Vandora M. Huggins-Edwards

Sean Matthew Foerster

The South Carolina Court of Appeals

Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgages Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under the pooling and Serving Agreement dates as May 01, 2005 without recourse, Respondents,

v.

Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards; Sylvia Anne Lawrence a/k/a Sylviette Anne Lawrence; Glenn M. Huggins; Michael Huggins; Donnell Huggins, Samuel Huggins; Ira Huggins a/k/a 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 Ricky 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, 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 Buster Huggins, Sr., Deceased, their heirs, Personal Representatives, 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; also any persons 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 under a disability being a class designated as Richard Roe; South Carolina Department of Revenue; Safeway Finance; Ford Motor Credit Company; General Motors Acceptance Corporation; White Directory Holdings 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 is the Appellant.

Appellate Case No. 2012-212524

ORDER

On October 15, 2013, Respondent filed a motion to compel Appellant to correct the record on appeal or, in the alternative to dismiss the appeal. Respondent notes that Appellant (1) failed to include all matters designated by Respondent in the record on appeal, (2) included matters not presented to the lower court, and (3) failed to comply with the South Carolina Appellate Court Rules. Appellant filed an amended record on appeal and an amended final brief on November 15, 2013; however, Appellant failed to file proof that she served Respondent, and the amended record and amended brief contain several deficiencies.

Within thirty days, Appellant must serve and file a second amended record on appeal and a second amended final brief. The record shall be filed in compliance with Rule 210 of the South Carolina Appellate Court Rules. Specifically, the record shall:

- (1) include all matters designated by the parties and shall not include any matters that were not presented to the lower court;
- (2) be consecutively numbered (1, 2, 3, 4, etc.);
- (3) begin with an index;

(4) contain the caption on the cover;

Appellant's second amended final brief shall be filed separately from the record on appeal (and shall not be included in the record on appeal), and its cover shall contain the caption.

Upon receipt of Appellant's second amended record on appeal and second amended final brief or upon the expiration of thirty days, this court will consider Respondent's motion to dismiss this appeal.


FOR THE COURT

Columbia, South Carolina

cc:
Vandora M. Huggins-Edwards
Sean Matthew Foerster, Esquire

FILED
12/12/13

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Case No. 2006-CP-10-2859
Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as
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a/k/a Adrienne Huggins Cotton; Sharon H. Smack;
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Ricky 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, 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 Buster Huggins, Sr., Deceased, their heirs, Personal
Representatives, Administrators, Successors and

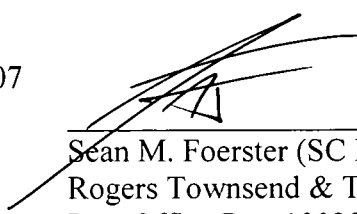
Assigns, and all other persons entitled to claim through them;
all unknown persons with any right, title or interest
in the real estate described herein; also any persons
who may be in the military service of the United States
of America, being a class designated as John Doe;
and any unknown minors or persons under a disability
being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor
Credit Company; General Motors Acceptance Corporation;
White Directory Holdings 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 is the Appellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent's Reply to Appellant's
Return to Respondent's Motion to Dismiss the Appeal on February 19, 2014, by
depositing a copy of each in the United States Mail, postage prepaid, addressed to the
following party of record:

Vandora M. Huggins
1218 Gunn Avenue
Charleston, South Carolina 29407


Sean M. Foerster (SC Bar # 77466)
Rogers Townsend & Thomas, PC
Post Office Box 100200(29202)
220 Executive Center Drive
Columbia, SC 29210
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sean.foerster@rtt-law.com

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SC Court of Appeals

Attorneys for Respondent Deutsche Bank National
Trust Company, as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass Through
Certificates, Series 2005-R4CGM under the Pooling
and Servicing Agreement dated as of May 1, 2005,
without recourse

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W RTT-LAW.COM

Sean M. Foerster
Sean.Foerster@RTT-LAW.COM
P 803.744-1855



February 19, 2014

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

RE: *Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under the Pooling and Servicing Agreement dated as of May 1, 2005, without recourse vs. Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards, et al.*
Appellate Case No. 2012-212524
Civil Action# 2006-CP-10-2859
Our File # 010378-00062

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of Respondent's Reply to Appellant's Return to Respondent's Motion to Dismiss the Appeal with Proof of Service in the above matter.

By copy of this letter, I am serving one copy of Respondent's Reply to Appellant's Return to Respondent's Motion to Dismiss the Appeal with Proof of Service on Appellant Vandora M. Huggins-Edwards.

Please have your staff return a filed copy of this document to me via the courier.

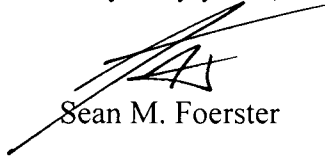
RECEIVED

FEB 19 2014

SC Court of Appeals

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be 'S.M. Foerster', is written over a horizontal line that extends to the right.

Sean M. Foerster

SMF/tds

Enclosures

cc:

Vandora M. Huggins-Edwards

1218 Gunn Avenue

Charleston, South Carolina 29407