

STATE OF SOUTH CAROLINA
COURT OF APPEALS
DISTRICT V

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FEB 24 2014

SC Court of Appeals

Anderson Brothers Bank
Plaintiff-respondent,

Vs.

Dazarhea Monique Parson, aka Dazarhea D Parson, a/k/a Dazarhea Monique Daniels
Parson, A. Tyrone, Jr. a/k/a Arnold Tyrone)Parson, Jr., South Carolina Department of
Revenue and South Carolina Department of Motor Vehicles, Defendants,

Defendant-appellants.

Appellant's Request for Production
Appeal number 2013-001865
Marion County Case number 2013-CP-33-306

Appeal from order granting summary judgment
Marion County Special Referee,
Haigh Porter, presiding

Arnold Jr. Dazarhea Parson
3546 Quail Roost Road
Mullins, South Carolina [29574]

February 18th 2014

Appellants, is unschooled in law and notices the court of enunciation of principles as stated in Haines v. Kerner, 404 U.S. 519, wherein the court has directed that those who are unschooled in law making pleadings and/or complaints shall have the court look to the substance of the pleadings rather than in the form, and hereby makes the following pleadings/notices in the above referenced matter without waiver of any defenses. With this fact in mind, Appellants requests this Honorable Court to consider their pleadings in substance.

Appellants request for production of all pertinent material facts pertaining to case number 2013-CP-33-306, Appellant case number 2013-001865, loan number 680427366, File number 12-54 including but not limited to:

1. Produce the original, genuine wet ink signature promissory note for our and the court inspection.
2. Produce the original genuine general ledgering and all CUSIP numbers for loan number 680427366, File number 12-54 included but not limited to: deposit receipt from the deposit of borrowers original promissory note, and any Federal Reserve Bank registration statement, balance sheets, and Chain of custody.
3. Produce the person entitled/ responsible for the ledgering from execution of the note.
4. Produce the real party/parties of interest pertaining to case number case number 2013-CP-33-306, Appellant case number 2013-001865, loan number 680427366, File number 12-54 to be deposited in open court.
5. Produce all witnesses with firsthand knowledge of bonified signature(s) of Appellant's/ borrower(s) and any other real party of interest on all note(s), mortgage notes, assignments, transfers of rights, negotiations, novation, and the like that would unambiguously delineates that the alleged creditor/lender is current owner, assignee, holder

in due course which absolutely evidenced alleged creditor/ lender full and complete disclosure including but not limited to any and all implied and/or expressed written contracts and/or any consent with any such agreement of a novation.

6. Produce any and all witnesses with firsthand knowledge of Appellant/ borrower being fully disclosed of all pertinent facts that borrowers would have to rely upon making any determination pertaining to the note, mortgage, assignments, transfers of rights that the borrower(s) actually funded their own loan that the bank would receive its equity in borrower(s) property for free.
7. Produce answers under oath to all interrogatories in Discovery and Full Disclosure. Just recently discovered the account number and loan number have been confused. The loan number is 680427366 the file number 12-54 is correct.
8. Produce all relative commercial instruments, contracts, whether implied or expressed which contained equal exchange of consideration and which contains verified bonafide signature(s) of Appellants /Borrower(s), and Respondent(s)/Lender.
9. Produce bonafide evidence that banks can lend their own credit/money.
10. Produce bonafide evidence rebutting the facts contained in Federal Reserve Bank publications including but not limited to Money Banking and Monetary policy Federal Reserve Bank of Dallas May 2007, I bet you thought Federal Reserve Bank of New York December 1977 Modern Money Mechanics Federal Reserve Bank of Chicago as well as The Chicago Plan Revised, IMF Working Paper August 2012, Quarterly Bulletin, Q1 Vol 48.No.1.Bank of England 2008, Affidavit of Walker F. Todd, Chagrin Falls, Ohio, USA, 05 Dec 2003- 20 yrs as attorney & legal officer of Federal Reserve Bank of New York & Cleveland.

11. Please provide proof that the Uniform Commercial Code 3-102 (c) which says "Regulations of the Board of governors of the Federal Reserve System and operating circulars of the **Federal Reserve Banks supersede any inconsistent provision of this Article** to the extent of the Inconsistency" as well as codified in South Carolina under

Title 36 is not a fact.

12. Please provide proof that Anderson Brothers Bank alleged creditor has standing to bring suit against Appellants/ alleged borrower(s) being that Anderson Brothers Bank took no loss from the purported loan in which the borrowers themselves funded.

13. Produce all reports of any experts, accountants, and the like upon which any of the Respondents intend to rely on in the trial of this cause or at any hearing, and all documents upon which Respondents intend to rely or which Respondents intend to introduce into evidence in support of any Motion or at the trial of this cause.

14. Please produce any relative and commercial instruments, notices, declarations, publication which clearly and unambiguously, delineate, that respondent was fully and completely apprised of all rights, duties, liabilities, cost, fees, obligations in advance or subsequent to occurrence of alleged debt and where there has been full disclosure of all relevant terms and conditions.

The above request for production is in accord with Rule 34 South Carolina Rules of Civil Procedure. Respondent has 30 days in good faith to produce verified copies signed under penalty of perjury on your unlimited commercial liability of all the above documents that are pertinent to this matter are true, complete, and not misleading. Respondents are to produce originals of all documents requested at trial to be inspected by the Appellant(s) and the judge for authenticity.

Failure to comply stands as prima facie evidence that Anderson Brothers Bank had no standing to bring suit against Appellant(s).

ALL RIGHTS RESERVED. WITHOUT RECOURSE

Arnold Parson Jr. Dazarhea Parson

Arnold Jr & Dazarhea Parson In Propria Persona Sui Juris

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FORM 7
PROOF OF SERVICE REQUEST FOR PRODUCTION Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM MARION COUNTY
Court of Common Pleas

The Honorable Haigh Porter, Master in Equity Special Referee Judge

Case No. 2013-CP-33-306

Appellate Case No. 2013-001865

Suzanne Grigg, as
Attorney of Anderson
Brothers Bank,

Respondent,

v.

Arnold Jr., Dazarhea
Parson

Appellant.

PROOF OF SERVICE

We certify that we have served the Request for Production on Anderson Brothers Bank by depositing a copy of it in the United States Mail, postage prepaid, on February 20, 2014 addressed to Anderson Brothers Bank attorney of record, Suzanne Grigg, 1230 Main Street, Suite 700 (29201) Post Office Drawer 2426 Columbia, South Carolina 29202.

February 20, 2014

Arnold Parson M. Dazarhea Parson

Arnold Jr., Dazarhea Parson In Propria Persona Sui Juris

Post Office Box 776

Mullins, South Carolina 29574

(843) 409-9086

Dorchester + Arnold Pearson Sr
c/o P.O. Box 1716
Mullins, SC 29574

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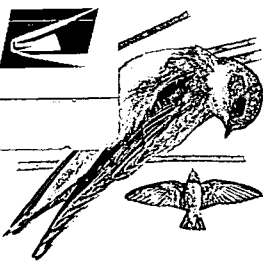


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FEB 21 2014

~~South Carolina~~ South Carolina Court of Appeals
SIC Court P.O. Box 11629
Columbia, SC 29211

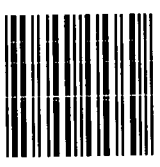
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