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SC Court of Appeals

**The state of South Carolina
In the Court of Appeals**

Appeal from Spartanburg County

Court of Common Pleas

Gordon G. Cooper, Master in Equity

Case No. 2012-CP-42-3027

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR ARGENT SECURITIES INC.,
ASSET-BACKED PASS-THROUGH CERTIFICATES,
SERIES 2004-W11,

RESPONDENT

v.

Geary Thomas Dooly a/k/a G. Thomas Dooly,

Appellant

Initial Brief of Appellant

geary-thomas, family dooly,
appellant, sui juris
c/o post office box 3326
spartanburg, south carolina [29304]
Phone (864) 978-3426

***The Appellant is not pro se, is not educated in law and is sui juris in all matters.**

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10. The 111 Page 3rd Amended Counter claim as Answer was "lost" from when I clocked it in on June 20, until July 24 when Appellant found it missing and Appellant provided a copy of his clocked copy for the record to the Clerk of Court, during which period, apparently Judge Couch assumed I was not going to file the 3rd Amended and referred the case to the Master-in-Equity in error which demands some kind of corrective action. Is this an error of the Court that damaged the Appellant?9

11. The Clerk of Court said that it would be in order for me to request that Judge Couch re-consider based on the lost document, and to request a hearing which I did request by paying the required \$25 and filing the proper form, however I have heard nothing from Judge Couch re that filing and request. Does this need to be rectified?9

12. There have been many acts of bad faith, of fraudulent activity on the part of Counsel, as well as unknown "bad" acts causing harm to the Defendant such as (a) loss of filing, (b) mailing Judge Couch's Order to me at a non-existent address, and others to be detailed later. Are these multiple acts, grounds to dismiss this entire case and ask the Plaintiff to re-file if they wish to do so?10

13. Did Judge Cooper act in bad faith by conducting the case on biased testimony and statement of false facts made by counsel, and by disallowing Appellant adequate time to review and compare documents?10

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Table of Authorities

Cases

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3	<i>Hanes v. Kerner</i> 404 US 520, <i>Birl v Estelle</i> 660 F.2d 592.6
4	<i>Clarke v American Commerce National Bank</i> , 974 F.2d 127(9th Cir. 1992)
5	<i>World Wide Volkswagon v. Woodsen</i> , 444 U.S. 286, 291.....
6	
7	<i>National Bank v. Wiley</i> , 195 U.S. 2575

Statutes

9 UCC 1-207 Performance or Acceptance Under Reservation of Rights.

10 UCC 3-301 Person Entitled To Enforce Instrument.

11 UCC 3-303 Value And Consideration.

12 UCC 3-305 Defenses And Claims In Recoupment.

13 UCC 3-306 Claims To An Instrument.

14 UCC 3-308 Proof Of Signatures And Status As Holder In Due Course.

15 Any and all Statutes that relate to "Surprise, Bafflement, Bewilderment, Lack of Warning,
16 Unexpected Event as occurred at Hearing to Dismiss Counterclaim by Counsel's Bad
17 Faith act of NOT providing Appellant with documentation to be presented at the Hearing.

Other Authorities

18 Four (4) Notarized Affidavits of John L. O'Brian, Jr., Register of Deeds Southern Essex
19 District Registry of Deeds, Salem, Massachusetts re FRAUD perpetrated by the Plaintiff
20 in filing Assignment of Mortgage and Note using ROBO signers, one alleged to be a
21 Notary of the State of Florida.

22 Notarized Affidavit from Clayton Cherry, Certified Mortgage Securitization
23 Auditor/Bloomberg Specialist stating, in part, subject Note has been Securitized,
24 currently trading, and is current in payments, thus "...the Trust-Entity has not suffered
25 any loss or damage from the loan herein." This makes it impossible for the Bank/Counsel
26 to legally have standing to bring this action.
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West's Encyclopedia of American Law, definition of "Surprise: An unexpected action, sudden confusion, or an unanticipated event. As a ground for a new trial, surprise means the condition in which a party to a lawsuit is unexpectedly placed and that is detrimental to that party's case. The situation must be one that the party could not reasonably have anticipated and that could not be guarded against or prevented." NOTE: This alone is grounds to vacate this Case.

Statement of Issues in Response

1. Were there fraud, deception, and bad faith acts throughout subject case?
2. Did the Respondent fail to establish authority and jurisdiction to act on behalf of Deutsche Bank National Trust Company?
3. Did Respondent fail to comply with repeated demands for a signed document delegating authority and contractual agreement with Counsel?
4. Did Respondent fail to reply, defend, or comply with the allegations presented in 3rd Amended Counterclaim, as Answer to Counter Plaintiff's Complaint?
5. Was subject Case referred to Master-In-Equity Court in error due to the Clerk of Court misfiling Appellant's 3rd Amended Counterclaim, as Answer to Counter Plaintiff's Complaint?
6. Did the Circuit Court honor Appellant's "DEFENDANT'S MOTION FOR COURT TO RECONSIDER ORDER DATED JULY 1,2013" and fail to schedule a requested hearing for which payment was made?
7. Did Judge Cooper focus the hearing on the erroneous statement of Counsel that the 3rd Amended Counterclaim was identical whereas one consisted of 10 pages, and the 3rd Amended was 111 pages?
8. With the initial Hearing for Motion before Judge Couch wherein Counsel failed to supply a copy of the supporting document such that Defendant had no opportunity to make any discussion or argument as to the merits of Counsel's arguments, was this a just hearing, and should it have not been re-scheduled that day so as to allow Defendant time to consider for at least the 72 hour period?
9. Was it just for Judge Couch to make a ruling to Dismiss in favor of the Motion with no argument from the Defendant since he was deprived, by fraudulent acts of counsel, of the document being discussed?
10. The 111 Page 3rd Amended Counter claim as Answer was "lost" from when I clocked it in on June 20, until July 24 when Appellant found it missing and provided a copy of his clocked copy for the record to the Clerk of Court, during which period, apparently Judge Couch assumed I was not going to file the 3rd Amended and referred

1 the case to the Master-in-Equity in error which demands some kind of corrective action.

2 Is this an error of the Court that damaged the Appellant?

3 11. The Clerk of Court said that it would be in order for me to request that Judge
4 Couch re-consider based on the lost document, and to request a hearing which I did
5 request by paying the required \$25 and filing the proper form, however I have heard
6 nothing from Judge Couch re that filing and request. Does this need to be rectified?

7 12. There have been many acts of bad faith, of fraudulent activity on the part of
8 Counsel, as well as unknown "bad" acts causing harm to the Defendant such as (a) loss of
9 filing, (b) mailing Judge Couch's Order to me at a non-existent address, and others to be
10 detailed later. Are these multiple acts grounds to dismiss this entire case and ask the
11 Plaintiff to re-file if they wish to do so?

12 13. Did Judge Cooper act in bad faith by conducting the case on biased testimony and
13 statement of false facts made by counsel, and by disallowing Appellant adequate time to
14 review and compare documents?

15 **Statement of the Case**

16 This Case was initiated by what is called a "Foreclosure Mill" in Atlanta, Georgia,
17 namely "Johnson and Freedman, LLC"(Johnson) on or about July 19, 2012. Then case
18 was sold, transferred, or given to Nelson Mullins Riley & Scarborough LLP (Nelson).

19 The first problem for the Defendant came when both Johnson and Nelson firms
20 replied to my Answer! On October 9, 2012 Appellant filed some very much needed
21 Interrogatories via filing document "DEFENDANT'S DISCOVERY:
22 INTERROGATORIES" re a) Plaintiff needs to be identified; b) How can the Bank hold
23 the note when in is being currently being traded via a specific CUSIP number; c) Why did
24 the Bank file a fraudulent Assignment with four (4) ROBO signatures – one claiming to
25 be a Notary; d) demanding written authority of Counsel; e) NO filing with Spartanburg
26 Clerk showing Nelson as Attorney of Record; and several others. ALL of the
27 Interrogatories were basically ignored in bad faith with no real answers being given.

28 Defendant filed several documents seeking Counsel to identify and document
29 items that they were relying on to bring the case – ALL were ignored or "sluffed-off" with

1 nebulous statements. These documents include: a) "DEFENDANTS DISCOVERY
2 SECOND INTERROGATORIES"; b) "DEFENDANT'S FIRST REQUEST FOR
3 ADMISSIONS"; c) "DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT"; and
4 several others. Again, Counsel being trained in the Law, in Bad Faith failed to cooperate
5 with Defendant who is NOT trained in the law even to the extent of FAILING to supply,
6 72 hours in advance, the documents and arguments to be to be presented in the now
7 infamous Motion to Dismiss Hearing, leaving Defendant/Appellant in the dark and
8 without ability to rebut what was presented to Judge Couch. That, apparently, biased
9 laxity of allowing a trained Attorney do commit such an act and to follow thru with a
10 ruling on said basis has caused much harm to this Appellant/Defendant and skewed the
11 outcome in favor of the Plaintiff unfairly and unjustly.

12 The above Hearing allowed me 30 days to file a 3rd Amended Counterclaim as
13 Answer, which was done in a timely fashion on June 20, 2013, HOWEVER that filing
14 was lost by the Clerk of Court, and could not be found by the Clerk of Court when I
15 brought it to her attention on July 24, 2013. The Clerk of Court asked me to supply a copy
16 of my clocked copy of the 111 page Document (3rd Amended), which I did. At the same
17 time, I brought to her attention, her Office had mailed Judge Couch's Order to a non-
18 existent address such that I did NOT have a copy until I discovered in the file on July 24,
19 2013. Both of these acts, (1) loss of filing, and (2) mis-mailing of Judges Order, appear to
20 be bad faith acts on the part of the Court officials. I inquired as to what was the proper
21 way to rectify these gross errors. The Clerk of Court advised that I file a motion for Re-
22 consideration, and for another Hearing – I paid the \$25 and completed the proper forms
23 per her instructions, and filed "DEFENDANT'S MOTION FOR COURT TO
24 RECONSIDER ORDER DATED JULY 1, 2013".

25 I expected to hear or receive something from Judge Couch since I had NOT been
26 allowed to properly defend myself at the previous Hearing before him. While waiting to
27 hear from Judge Couch, Respondent scheduled a Hearing to Dismiss Counterclaims in
28 the Court of Equity of Judge Cooper based on the errant Form 4 that actually contained
29 three (3) dates with two scratched thru but not initialed. I believe the file was referred to

1 the Court of Equity in error during the time that the 111 page filing remained LOST!

2 During the Hearing before Judge Cooper, he accepted Counsel's statement, "We
3 also included as part of that Motion another request that it be referred to be safe." (see pg
4 2 line 23 of transcript; however, the record, to my knowledge, does not contain such a
5 request to Judge Couch as he requested in his order. Judge Cooper also accepted Counsel
6 misleading statement on page 4 lines 16 – 20 of transcript that says: "..... And that is why
7 we believe that we are properly here today." That is wrong. The obvious intent of the
8 order was to refer AFTER the 3rd Amended Counterclaim as Answer was presented;
9 HOWEVER, with it LOST by the Clerk of Court, Judge Couch apparently proceeded
10 since he did not see the lost filing. Convenient to the process, but to my detriment
11 unfairly and unjustly done, either knowingly or unknowingly .

12 Judge Cooper states the matter was "referred" on page 5, line13, and page 6, line
13 14, and Page 8, line 25, and page 9 line 13 of the Transcript, as if it was referred properly
14 and with the lost filing being of no merit! Judge Cooper then directed the discussion to
15 the 3rd Amended being the same as previous even though the 3rd Amended was 111
16 pages, and the previous was 10 pages. Judge Cooper asked me to tell him what the
17 differences were, to which I replied, that I did not have them both in front of me and
18 could not from memory of several months ago point out the differences. I asked that he
19 allow me time to so review and he denied me such on page 18 line 15, and 18 of the
20 Transcript. He accepted the statement of counsel and would not make Counsel defend
21 how they were identical. Judge Cooper showed bias on page 19 line 11 of the Transcript
22 when I stated, "I have a few questions". Cooper gruffly replied "Have a seat." And then
23 told Counsel, "Prepare the Order."

24 **Facts**

- 25 1. An answer "**DEFENDANT'S COUNTERCLAIM AS ANSWER TO**
26 **PLAINTIFF'S COMPLAINT NEGATING DEFENSE, & DEMAND FOR**
27 **TRIAL BY JURY**" was entered on the Court Record on Aug 17, 2012.
- 28 2. Appellant entered into the Court Record on Sep 28, 2012 "**DEFENDNT'S**
29 **RESPONSE TO PLAINTIFF'S REPLY TO COUNTERCLAIM AS ANSWER**"

1 which points out, in part, important flaws to the Counsel; a) My demand for a copy of
2 "Proof of Authority" signed by the Plaintiff giving Counsel authority to bring this
3 action was valid and quoted *Clarke v. American Commerce National Bank* that ruled
4 such information is NOT privileged. It was never supplied.; b) provided certified
5 expert proof that subject Note was currently being traded via CUSIP040104ME8.
6 This proof was via a Certified Mortgage Securitization Auditor/Bloomberg Specialist
7 sworn to before a Notary, and included computer screen shots of my loan number on
8 the trading screen and showing "current"—thus Plaintiff has no authority to bring this
9 action, and no legitimate Bank would so bring such an action. Who IS the Plaintiff?
10 This would be a securities violation! Law stated in this filing:

11 3. Appellant entered into the Court Record on May 16, 2013 "**DEFENDANTS**
12 **MOTION FOR SUMMARY JUDGEMENT**" which clearly points out the fraud
13 being perpetuated in this case. This FRAUD is document by four (4) AFFIDAVITs
14 from John L. O'Brian, Register of Deeds of Commonwealth of Massachusetts,
15 Southern Essex District Registry of Deeds, Salem, Massachusetts. His proof is NOT
16 just his opinion but he hired forensic analyst, Marie McDonnell of McDonnell
17 Analytics to perform the investigation of the four (4) signatures on the Assignment of
18 my documents to the Plaintiff. This fraudulent Assignment document is Recorded by
19 the Clerk of Court, Spartanburg County, and should be removed from the records
20 immediately.

21 4. Appellant entered into the Court Record on Jan 31, 2013 "**DEFENDANT'S**
22 **COUNTERCLAIM AS ANSWER TO PLAINTIFF'S COMPLAINT**
23 **NEGATING DEFENSE, & DEMAND FOR TRIAL BY JURY - 1st Amended**
24 **Counterclaim to Complaint**"

25 5. Appellant entered into the Court Record on Jan 31, 2013 "**DEFENDANT'S**
26 **AFFIDAVIT OF DECLARATIONS**" wherein Defendant makes 42 Declarations
27 over Notary Seal that relate to this case and the actions of those prosecuting the case,
28 and those that created and authorized the documents, or sold or gave such documents
29 to prosecutors. Page 11, last paragraph, of this filing states, "Your silence is your

1 acquiescence. Failure to answer and rebut with specificity is considered silence just as
2 failure to answer and rebut is considered silence. See *Connally v. General Construction*
3 *Co.*, 269 U.S. 385,391. No rebuttal has been offered thus each and every Declaration is
4 now an admission of the FACTS as declared.

5 **Arguments**

6 The Appellant is not pro se, is not educated in law and is sui juris in all matters.
7 The Court is further noticed that, the Appellant/Defendant being sui juris, not educated in
8 the law, the Court must read and construe liberally all pleadings by Appellant/Defendant
9 per *Hanes v. Kerner 404 US 520, Birl v Estelle 660 F.2d 592*.

10 The primary matters before the appellate court are (1)the numerous and repeated
11 acts of bad faith, and/or fraudulent acts perpetuated to bring this action that resulted in the
12 erroneous hearing before Judge Cooper; (2) the errors in, and acts of bad faith actions in
13 the court by officers of the Court, namely Counsel, and Judge Cooper; and (3)
14 Considering the comedy of errors, omissions, and conduct of those perpetuating the
15 handling of this case, should the case be dismissed with prejudice? All matters relevant.

16 **1. Was there fraud, deception, and bad faith acts throughout subject case?**

17 Yes, absolutely. On the part of Counsel by withholding proof of authority,
18 withholding proof of standing and jurisdiction, purposely failing to supply documentation
19 of considerations to be heard before Judge Couch in the Motion to Dismiss Hearing thus
20 purposely leaving Appellant defenseless at that hearing, and with the cooperation and
21 collusion of Judge Couch deprived Appellant to ever address the issues brought forth.
22 The Clerk of Court "lost" a key filing and at the same time failed to mail Judge Couch's
23 order to the Appellant/Defendant further handicapping the Appellant/Defendant. These
24 acts of OBSTRUCTION OF JUSTICE and of ABUSE OF OFFICIAL CAPACITY are
25 verified on the record in this case by Notarized AFFIDAVITS of Appellant/Defendant,
26 and Notarized AFFIDAVITS by two (2) independent parties upon each of the Attorneys
27 of Counsel, and the Clerk of Court. These affidavits are recorded as exhibits on 3rd
28 Amended Counterclaim as Answer and have not been rebutted. Proof that fraud upon the
29 Court was a part of this case.

1 **2. Did the Respondent fail to establish authority and jurisdiction to act on behalf**
2 **of Deutsche Bank National Trust Company?**

3 Absolutely did not provide any evidence whatsoever. Multiple request were made in this
4 regard, and Counsel failed on every count to supply such in spite of being given court
5 case law that it is not privileged information. It is very obvious that the Bank has given no
6 such authority for Counsel to bring this action since the Bank sold the Promissory Note in
7 a securitization process and has no standing.

8 **3. Did Respondent fail to comply with repeated demands for a signed document**
9 **delegating authority and contractual agreement with Counsel?**

10 As in #2 above, not only did Counsel fail to establish, Counsel failed to comply with
11 demands to provide said authority from the Bank/Plaintiff. Without such proof, Counsel
12 is masquerading as the Plaintiff in a fraudulent manner.

13 **4. Did Respondent fail to reply, defend, or comply with the allegations presented**
14 **in 3rd Amended Counterclaim, as Answer to Counter Plaintiff's Complaint?**

15 There was absolute failure in that the content of the 3rd Amended Counterclaim filing has
16 never been heard before the court as to its complete contents. Even at the first hearing
17 before judge Couch, Appellant/Defendant was not able to defend Counterclaim merit due
18 to Counsel withholding the documentation of what was to be heard at least for 72 hours.
19 Not only did he NOT allow 72 hours, that document was mailed so as to arrive in my
20 P.O.Box on the same day of the hearing which was at 10:30, therefore Appellant had
21 ZERO hours to review said documentation in gross violation of Court procedure.

22 **5. Was subject Case referred to Master-In-Equity Court in error due to the**
23 **Clerk of Court misfiling Appellant's 3rd Amended Counterclaim, as Answer to**
24 **Counter Plaintiff's Complaint?**

25 Definitely, referred in error. In fact, Judge Couch would not have even seen a LOST filing
26 in that when it was discovered missing, the file had already been sent to Judge Coopers
27 Court and that is where I found it to be missing as well as the order from judge Couch
28 that was NOT mailed to my address by the Clerk of Court. Appellant/Defendant
29 discovered it missing from the file on 7-24-13.

1 **6. Did the Circuit Court honor Appellant's "DEFENDANT'S MOTION FOR**
2 **COURT TO RECONSIDER ORDER DATED JULY 1, 2013" and fail to schedule a**
3 **requested hearing for which payment was made?**

4 To my knowledge, the Circuit Court, Judge Couch responded in any way to this Motion
5 and has not scheduled the requested hearing. The Motion has never been denied or
6 granted. It is possible that the Motion was sent to the file that may have already, in error,
7 been transferred to Judge Cooper. In any, event, the Court has ignored it to my detriment,
8 and the Courts gain ---- unjustly.

9 **7. Did Judge Cooper focus the hearing on the erroneous statement of Counsel**
10 **that the 3rd Amended Counterclaim was identical whereas one consisted of 10**
11 **pages, and the 3rd Amended was 111 pages?**

12 Yes, Judge Cooper totally accepted the unsubstantiated statements of Counsel that was
13 absolutely new to this case and ignorant of what had occurred. There was no
14 consideration given to the merits of the errors that had occurred. Judge Cooper focused
15 the hearing on "was the 10 page filing and the 111 page filing identical, and accept the
16 testimony that they were identical, which is mathematically impossible. Judge Cooper
17 denied me the time and opportunity to have the 2 documents before me to compare, and
18 apparently expected to me to remember all the details from memory of several months
19 earlier. It was a "railroad" job wherein Counsel and Judge Cooper in collusion operated
20 with one thing in mind, ie: Dismiss the Counterclaim regardless of what was right and
21 just. In fact, it appeared that Judge Cooper was "trying" the case, rather than judging the
22 case since he drew out facts by questioning Counsel and accepted statements as fact. It
23 was very difficult to conduct a fair presentation under the circumstances. I was appalled at
24 the actions and found it very difficult to maintain fairness to the hearing.

25 **8. With the initial Hearing for Motion before Judge Couch wherein Counsel**
26 **failed to supply a copy of the supporting document such that Defendant had no**
27 **opportunity to make any discussion or argument as to the merits of Counsel's**
28 **arguments, was this a just hearing, and should it have not been re-scheduled that**
29 **day so as to allow Defendant time to consider for at least the 72 hour period?**

1 Absolutely, it was NOT a just Hearing, and absolutely upon Judge Couch discovering the
2 violation of the 72 hour rule to the extent of ZERO hours (The document was apparently
3 placed in my mail box during the hearing since that is about the time that mail get "into" a
4 mail box), Judge Cooper should have stopped the hearing and asked Counsel to
5 reschedule a hearing so as to allow adequate time. Judge Couch failed to do that act of
6 justice.

7 **9. Was it just for Judge Couch to make a ruling to Dismiss in favor of the Motion**
8 **with no argument from the Defendant since he was deprived, by fraudulent acts of**
9 **counsel, of the document being discussed?**

10 No, it was totally unjust for Judge Couch to continue the Hearing knowing that I had
11 never even seen the document for ONE MINUTE, let alone 72 HOURS!!! Totally unjust,
12 unfair, and out of order for Judge Couch to act in this manner.

13 **10. The 111 Page 3rd Amended Counter claim as Answer was "lost" from when**
14 **I clocked it in on June 20, until July 24 when Appellant found it missing and**
15 **Appellant provided a copy of his clocked copy for the record to the Clerk of Court,**
16 **during which period, apparently Judge Couch assumed I was not going to file the**
17 **3rd Amended and referred the case to the Master-in-Equity in error which demands**
18 **some kind of corrective action. Is this an error of the Court that damaged the**
19 **Appellant?**

20 All these errors, abuse, fraud, collusion, and this "lost" filing by the Clerk of Court did
21 severely damage the outcome of this case, and the Appellant.

22 **11. The Clerk of Court said that it would be in order for me to request that**
23 **Judge Couch re-consider based on the lost document, and to request a hearing**
24 **which I did request by paying the required \$25 and filing the proper form, however**
25 **I have heard nothing from Judge Couch re that filing and request. Does this need to**
26 **be rectified?**

27 Absolutely, this MUST be rectified. It is blatant abuse of the Appellant/Defendant to just
28 ignore a Motion, and to ignore a request for Hearing, and to just keep the \$25 fee. This
29 case is laced with errors, collusion, fraud, and deception and should be dismissed in

1 Officials have committed the fraud of OBSTRUCTION OF JUSTICE, and/or ABUSE
2 OF OFFICIAL CAPACITY.

3 This fraud is further complicated wherein the bank has committed fraud by filing
4 false documents with the Clerk of Court in the form of and Assignment signed,
5 witnessed, and notarized by four (4) fraudulent ROBO signers. That document is falsely
6 filed in Spartanburg County with the Clerk of Court. It is "on the record" under Notary
7 Seal that these four (4) signatures are fraudulent as witnessed via affidavit of an Officer
8 of the Court, namely, John L. O'Brian, Register of Deeds, Salem Massachusetts.

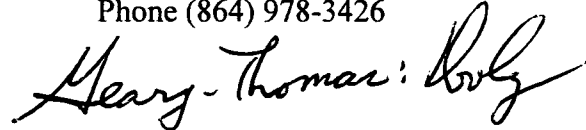
9 Finally this case is motioned to be vacated on the basis of the "SURPRISE"
10 brought forth by Counsel by failure to provide Defendant with information to be heard at
11 Trial by mailing said document the day before the Hearing.

12 And any other disciplinary action against the RESPONDANT(S) and the trial
13 court judge that seem proper and necessary.

14 Respectfully submitted,

15 March 12, 2014

16 geary-thomas, appellant, sui juris
17 c/o: post office box 3326
18 spartanburg, south carolina [29304]
19 Phone (864) 978-3426

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CERTIFICATE OF SERVICE

I, Geary-Thomas: Dooly, hereby certify that a copy of the following documents have been mailed on or before this date via USPS with proper postage to each party listed:

DOCUMENTS

- 1. Notice of Appeal as filed Clerk of Court Spartanburg County.
- 2. DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL – Form 14.
- 3. INITIAL BRIEF OF APPELLANT

PARTY(IES)

Nelson, Mullins, Riley, & Scarborough, LLP
 Attn: Sarah R. Anderson (SC Bar # 100007)
 Giles M. Schanen (SC Bar # 70391)
 P.O.Box 10084
 Greenville, South Carolina 29603-0084

Date: March 12, 2014

Geary-Thomas: Dooly
 c/o P.O.Box 3326
 Spartanburg, South Carolina
 29304

Geary-Thomas: Dooly

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