

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

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

RECEIVED
MAR 17 2014
SC Court of Appeals

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

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Appellant proposes the following be included in the Record on Appeal:

1. COMPLAINT NON-JURY MORTGAGE FORECLOSURE Deficiency
Judgement Demanded Filed: Jul 19, 2012. [A-1]

FORM 14

2. DEFENDANT'S COUNTERCLAIM AS ANSWER TO PLAINTIFF'S COMPLAINT NEGATING DEFENSE, & DEMAND FOR TRIAL BY JURY Filed: Aug 17, 2012. [A-2]
3. DEFENDANT'S DISCOVERY: INTERROGATORIES Filed Oct 9, 2012. [A-8]
4. DEFENDANT'S RESPONSE TO PLAINTIFF'S REPLY TO COUNTER CLAIM AS ANSWER Filed Sep 28, 2012, [A-5].
5. DEFENDANT'S REPLY TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION Filed Nov 28, 2012. [A-11]
6. DEFENDANT'S REPLY TO PLAINTIFF'S FIRST INTERROGATORIES Filed Nov 28, 2012. [A-12]
7. PLAINTIFF'S ANSWERS TO DEFENDANT'S DISCOVERY: INTERROGATORIES Filed Dec 7, 2012. [A-14]
8. DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT Filed May 16, 2013. [A-16]
9. DEFENDANT'S COUNTERCLAIM AS ANSWER TO COUNTER PLAINTIFF'S COMPLAINT AND DEMAND FOR JURY TRIAL(1st Amended Counterclaim To Complaint) Filed Jan 31, 2013. [A-19]
10. DEFENDANT'S AFFIDAVIT OF DECLARATIONS Filed Jan 31, 2013. [A-21]
11. DEFENDANT'S OBJECTION TO PLAINTIFF'S MOTION TO DISMISS COUNTERCLAIMS Filed Jan 31, 2013.[A-23]
12. PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST REQUEST FOR ADMISSIONS Filed Jan 25, 2013. [A-24]
13. NOTICE TO THE COURT AS RELATES TO MOTION TO DISMISS COUNTERCLAIM HEARING. [A-28]
14. DEFENDANT'S COUNTERCLAIM TO PLAINTIFF'S COMPLAINT; and DEMAND for JURY TRIAL Filed Jun 20, 2013. [A-30]
15. DEFENDANT'S MOTION FOR COURT TO RECONSIDER ORDER DATED JULY 1, 2013. [A-31]
16. ORDER of Judge Cooper Dated December 31, 2013. [A-34]

FORM 14

I certify that, to the best of my ability, this designation contains no matter which is irrelevant to this appeal.

March 12, 2014

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

Geary Thomas: [Signature]

CERTIFICATE OF SERVICE

I, Geary-Thomas: Dooly, hereby certify that a copy of the following documents has 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)
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Date: March 12, 2014

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