

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

The Honorable Diane S. Goodstein
Circuit Court Judge

Case No. 2012-CP-38-01108
Appellate Case No. 2013-001414

Laura T. Toney.....Appellant,

v.

Deutsche Bank National Trust Company, as trustee for
The holders of New Century Home Equity Loan Trust,
Series 2005-A, asset backed pass-through certificates;
LaSalle Bank national Association, trustee for Lehman
Brothers Structured Asset Investment Loan Trust Sail
2005-2; All persons unknown, claiming any legal or
Equitable right, title estate, lien, or interest in the
Property described in the Complain, adverse to
Plaintiff's Title thereto; referred to as Doe.....Respondents.

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MAR 31 2014
SC Court of Appeals

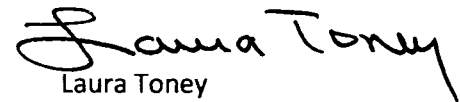
**Reply to Respondent's Motion to Dismiss Appeal
And Motion to Request an Extension to File the Appellant's Initial Brief and
Designation of Matter**

The Appellant respectfully requests that the Plaintiff's Motion to Dismiss is denied and the Appellant is given an extension of time to file the Appellant's Initial Brief and Designation of Matter for the following:

1. The Appellant has attempted on several occasions to secure the transcript from the hearings in this case, but was unable to.
2. The Appellant never received a copy of the transcript from the Respondent.

3. The Appellant has even contacted the Court Administration's Office in attempting to secure the transcript.
4. The Appellant has even visited the Orangeburg County Clerk of Court's Office in an attempt to secure a transcript.
5. The Appellant has written several court reporters in an attempt to secure the transcripts.
6. The Appellant is requesting that the Respondent mails a copy of the transcript to her. I will be willing to pay for the copying expenses.
7. The Appellant has included letters written to court reporters and the court administration's office.
8. The Appellant is sorry for any inconveniences that this might have caused the Court, but the Appellant exhausted all remedies in securing this transcript.
9. The Appellant prays that the court will give her an extension to file her Initial Brief and Designation of Matter and deny the Respondent's Motion to Dismiss.

March 28, 2014


Laura Toney
P.O. Box 722
Bishopville, SC 29010
(803) 459-6006

December 19, 2013

P.O. Box 722
Bishopville, SC 29010

Ms. Rose Walker
120 Waterview Road
St. Mathews, SC 29135

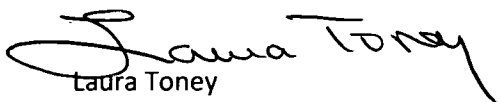
RE: Transcript from hearings dated April 1, 2013
Case No. 2012-CP-38-1108
Judge Diane Goodstein

Dear Ms. Walker:

Please provide the cost of the above transcript from the above Hearings. Please mail the information to the above address.

Thank you for your attention in this matter.

Sincerely,


Laura Toney

CC: Court Administration
South Carolina Court of Appeals
Korn Law Firm

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December 19, 2013

P.O. Box 722
Bishopville, SC 29010

Ms. Sharon Vizer
P.O. Box 1413
Johns Island, SC 29457

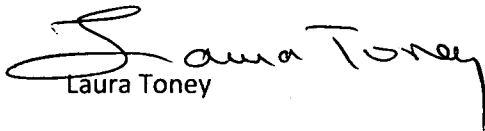
RE: Transcript from hearings dated May 20, 2013
Case No. 2012-CP-38-1108
Judge Diane Goodstein

Dear Ms. Vizer:

Please provide the cost of the above transcript from the above Hearings. Please mail the information to the above address.

Thank you for your attention in this matter.

Sincerely,


Laura Toney

CC: Court Administration
South Carolina Court of Appeals
Korn Law Firm

November 25, 2013

P.O. Box 722
Bishopville, SC 29010

Ms. Hilda Jordan
P.O. Box 435
Lexington, SC 29071

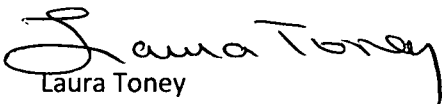
RE: Transcripts from hearings dated April 1, 2013 and May 20, 2013
Case No. 2012-CP-38-1108
Judge Diane Goodstein

Dear Ms. Jordan:

Please provide the cost of the above transcript from the above Hearings. Please mail the information to the above address.

Thank you for your attention in this matter.

Sincerely,


Laura Toney

CC: Court Administration

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SC Court of Appeals

October 1, 2013

**P.O. Box 722
Bishopville, SC 29010**

**Ms. Hilda Jordan
P.O. Box 435
Lexington, SC 29071
Via Certified Mail**

RE: Court Transcripts for 2012-CP-38-1108

Dear Ms. Jordan:

Please provide me with the costs of the transcripts in the above case.

There were (2) hearings in the above case.

Thank you for your attention in this matter. This is my second request.

Sincerely,


Laura Toney

**South Carolina Court of Appeals
Court Administration
Korn Law Firm**

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SC Court of Appeals

November 1, 2013

P.O. Box 722
Bishopville, SC 29010

South Carolina Court of Appeals
Jenny Abbot Kitchings, Clerk
P.O. Box 11629
Columbia, SC 29211

Dear Madam:

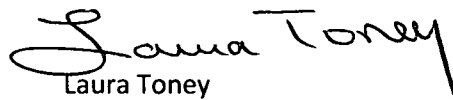
I am writing this letter in response to your letter dated October 29, 2013.

I have attempted several times to secure a transcript from the court reporter, but have not gotten a response from Ms. Hilda Johnson. This last attempt to secure a transcript was mailed by certified mail. I am enclosing a copy of the letters sent to Ms. Johnson. I have also mailed a copy of the letter to the Court Administration's office as well.

I need some direction from the Court on how to proceed. Ms. Johnson has refused to acknowledge my letters requesting the transcripts.

Thank you for your indulgence in this case.

Sincerely,


Laura Toney

CC: Korn Law Firm

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APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Diane S. Goodstein
Circuit Court Judge

Case No. 2012-CP-38-01108
Appellate Case No. 2013-001414

Laura T. Toney.....Appellant,

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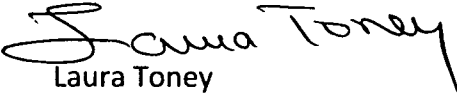
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The holders of New Century Home Equity Loan Trust,
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2005-2; All persons unknown, claiming any legal or
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Property described in the Complain, adverse to
Plaintiff's Title thereto; referred to as Doe.....Respondents.

Reply to Respondent's Motion to Dismiss Appeal
And Motion to Request an Extension to File the Appellant's Initial Brief and Designation of
Matter

CERTIFICATE OF SERVICE

The Appellant certifies that she mailed a copy of the Reply to Respondent's Motion to
Dismiss Appeal And Motion to Request an Extension to File the Appellant's Initial Brief and
Designation of Matter to Nelson, Mullins, Riley & Scarborough LLP addressed at P.O. Box 11070,
Columbia, SC 29211-1070 on March 28, 2014, via United States Postal Service.

CC:
Nelson, Mullins, Riley & Scarborough


Laura Toney

P.O. Box 722

Bishopville, SC 29010

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SC Court of Appeals

March 28, 2014

P.O. Box 722
Bishopville, SC 29010

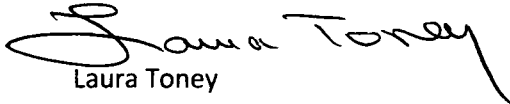
South Carolina Court of Appeals
Clerk of Court
P.O. Box 11629
Columbia, SC 29211

Dear Sir or Madam:

Please find enclosed (1) original and (6) copies of the Reply to Respondent's Motion to Dismiss and Motion to Request an Extension to file the Appellant's Initial Brief and Designation of Matter. Also, included is the \$25.00 filing fee.

Thank you for your attention in this matter.

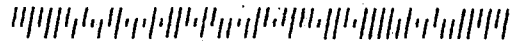
Sincerely,


Laura Toney

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SC Court of Appeals



P.O. Box 722
Bishopville, SC 29010

South Carolina Court of Appeals
Jenny Abbot Kitchings, Clerk
P.O. Box 11629
Columbia, SC 29211