

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

P. Dof 2

APPEAL FROM YORK COUNTY
Court of Common Pleas

Charles S Bradford, Master and Special Referee

Case No. 2014-000346

Wells Fargo Bank na

Respondent

v.

Alice L Roseboro

Appellant

**REPLY BRIEF
No Opposition**

Alice L Roseboro
1852 Bon Rea Dr.
Rock Hill SC 29730
803-579-2331
Pro Se Attorney

Alice L Roseboro

RECEIVED

MAY 19 2014

SC Court of Appeals

TABLE OF CONTENTS

- ①. Filing Fee Paid \$150.00 due to hindrance on Motion to Proceed Without Pay
 - ② Reply Brief document to support a No. Opposition from Respondent in 30 days
Allow under Rule 208
 - ③. New Cover Sheet for Initial Briefing
Replacement do to allege hindrance from the Local Library, correcting type and margin errors
 - ④ Motion to Compel with Affidavit Pursuant to Rule 208 for No Opposition! copy Attached from 4/28/14.
-
- Also Info Below
- ⑤ Proof of Service
 - ⑥ Designation of Matter - Proposed for Reply Brief

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

P. 3

APPEAL FROM YORK COUNTY
Court of Common Pleas

Charles S Bradford, Master and Special Referee

Case No. 2014-000346

Wells Fargo Bank na

Respondent

V.

Alice L Roseboro

Appellant

"Motions To Compel with Affidavit Included"

April 28 2014 No Opposition Reply from Respondent

I appellant again in Reply Brief ask the Appeals Judges to grant a judgment against the respondent

Wells Fargo Bank for there No. Opposition! To my Initial Brief in the 30 day reply time pursuant to rule

208 Rules state they are to be held accountable to the facts I allege in my initial brief sent. A new Cover

Sheet is also enclosed do to hindrance of typo and margins errors from local library. My first Appeals

Notice had to be resent do to allege hindrance from using the local library. The same library my former

Employer Comporium provides internet service for and that I also have a Appeals Case Pending on them

As well(Case No 12-2136). Please update with the New Cover Sheet enclosed for my Initial Brief.

Facts show the Respondent gave No. Opposition Reply to accepting less than the entire transcript.

Request all other appellants be removed as they filed there affidavits on a Fraud Foreclosure Action

against me, and as the Facts of Amanda's Weatherly affidavit under her sworn oath proves that this

foreclosure action was filed on First Union Bank I have not been with in over 13yrs are paid any

payments to in over 13years as my account was sold to another bank over 13 years ago. Since the Wells

Fargo Bank delivered this fraud info to the creditors and the public, I make Motion to compel by way of

R4

Affidavit for the Respondent to pay All the Creditors off in Full on whatever the balance, they allege I owe. And any taxes are additional fees arising for these creditors be paid by the respondent Wells Fargo Bank . They in fact by failing to police the actions of there employees, deceived All the Creditors who filed there Affidavits, and deceived me by filing this Fraud Foreclosure on me with the wrong bank.

A First Union Bank and wrong account No. 8784872 as noted in Amanda Weatherly's Affidavit she submitted to the court. The respondent also informed the court I did not turn in all my paper work on

My modification. When proof of letter sent on Oct 8 2010 shows the modification was complete. They Also claim I still owed for my Nov 1 2010 mortgage , but proof sent to the court and respondent shows I did pay my Nov 1 2010 mortgage payment. The lied to the court, to the Creditors and to me.

I appellant also make motion to compel by this affidavit for the Judge S Jackson Kimball II and the attorney Thomas E Lydon be Suspended and Disbarred for withdrawing the Summary Judgment at the Sept 17 2013 hearing to keep me from testifying and submitting my evidence to the court in direct opposition to there summary judgment as verified on page/ 16 / of the court transcript . They

Both violated my rights under the 14 amendment for Due Process on civil Procedures. U. S. Supreme Ct Brady v. Maryland 373 U.S. 83) There fraud Proposed Order filed by the attorney On Sept 19 2013 was granted entry Into court and signed by Judge Kimball III on Sept 20 2013 before I could give my comment a rule 5 b (30 violation of civil procedures. This was a unfair hindrance to me. I appellant

also make motion for the Master and Special Referee Charles S Bradford be Suspend for a conflict of interest he has cause ,violation of the Code of Cannon 4 ,since his employee Diane verified to me that his office does closing for the Wells Fargo Bank , his being the judge was a showing of Bias in the court tribune Code of Cannon 3 violation. I feel he showed partiality when he knows he does closings for the Wells Fargo Bank, The Master Referee knew his actions would create a conflict of interest .He

P.S

should have bowed out gracefully and let another judge take over. The Master and Special never sent me a copy of the Jan 10 2014 hearing signed by him for me to attend ever and I give true affirmation to this. The judge Bradford in fact signed off on a Proposed Order sent to me by the attorney on Jan 21 2014 and received in the mail on Jan 23 2014. Rule 5 b (3) states I have the right to comment on a Proposed Order Before the Judges signs it. The Judge Charles S Bradford had signed the Proposed Order on Jan 23 2014 and the court with held the signature page from me for over 10 days. My reply was given to his office on Jan 28 2014, My reply had no merit since the Judge Charles S Bardford signed off on it Jan 23 2014. His signing show his loyalty was with Wells Fargo Bank as he does closings for them. His denying my comment by signing on Jan 23 2014 was Bias a Code Cannon 3 violation, he was not being fair as he took an oath to do. I ask the court and make motion to compel by way of this affidavit for the Master and Special Referee Charles S Bradford be Suspended for creating a Conflict of Interest and being Bias in his tribune. Facts show he was prejudice toward me being Pro Se. I ask that my full request be granted from my Initial Brief and in this Reply since the Respondents gave NO Opposition., by there silence they agreed and concurred to all I allege., so I concur I ask the Appeals Judges to stipulate , for denying my right to Due Process under the 14 amendment.

Sincere Respect

Appeals Judges

Alice Roseboro

THE STATE OF SOUTH CAROLINA

P.6

In The Court of Appeals

05/16/2014

Case No. 2014-000346

C/O The Clerk of Court Office/ Jenny Abbott Kitchings

For: Amelia Case Manager Assigned

Hello Amelia ,

I Alice appellant on case noted above, detected another error in printing of my Cover Sheet I Submitted for my **INITIAL BRIEF OF APPELLANT**. It appears the margins got off track when the document sheet from the computer I was station at was sent to the library printer, as well as the caption written different from what I typed up. I am sending you the Correct Copy of what I Typed Up and should have been capture to the library printer. Please remove the old copy that left the Heading Cut off at the top the page on the first two lines noted above: and Replace with The New Copy Cover Sheet Enclosed with this letter.)

I am sending the same info to the attorney for Respondent, Thomas E. Lydon to correct his cover sheet as well. There appears to be Some unexpected interference, but I will try to be more alert in the future, when I print.

Sorry I did not catch this sooner.

Sincere Thanks,


Alice L Roseboro

CC. Thomas E . Lydon

next page
is new
cover sheet

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY
Court of Common Pleas

Charles S Bradford, Master and Special Referee

Case No. 2014-000346

Wells Fargo Bank na

Respondent

v.

Alice L Roseboro

Appellant

INITIAL BRIEF OF APPELLANT

Alice L Roseboro
1852 Bon Rea Dr
Rock Hill SC 29730
803-579-2331
Attorney for Appellant



Table of Content (No. 4)

Resending Motion and Affidavit

FROM 04/28/2014 \$25⁰⁰ Fee Paid

No Opposition Reply from Respondent

IN 30 DAYS ALLOWED

Next 6 pages Attached FOR NO. 4

OF Reply Brief

DUFB

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Doc #2

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS

CASE NO. 2014-000346

Wells Fargo

Respondent

vs.

Alice L. Roseboro

Appellant

"MOTION TO COMPEL AFFIDAVIT"
FOR RELIEF PURSUANT TO RULE 208
NO! OPPOSITION!

I Appellant hereby make motion by way
of affidavit for the Appellate Court to
grant me a judgment by reversing
the decision of the Lower Court from
judgment enter on Feb 10 2014 from the
Master and Special Referee Charles S. Bradford;

2

In accordance with rule 208 of INITIAL Brief, the respondent was sent a certified copy of my initial Brief by proof of service on 03/21/2014, The respondents had 30 days to reply back under Rule 208 A(2) the Attorney for respondent failed to reply back during the time frame allowed. I Appellant hereby way of AFFIDAVIT, make motion to compel the Appellate court and respectfully ask that they grant me relief of all that I ask under the Conclusion of Comment noted in my Initial Brief on filed with the Appellant Court sent also with proof of service, since the respondent gave NO OPPOSITION! AND NO Reply! By there silence, the respondents agreed to all I Allege

3

Under Rule 208 including the prayer for relief, I ask the court for The Respondent

Denied me due Process. Brady vs. Maryland 373 US 83.

By the Respondent's silence they concurred by their silence I fully concur. I

Appellant respectfully ask the Appeals Judge John C. Few to stipulate and

grant me a judgment by default, do to NO. Opposition! from respondent

to my Initial Brief, pursuant to Rule 208 guidelines for respondent's Reply. The

Respondent and Judge "With drew the Summary

Judgment at the hearing Sept 17, 2013 Denied my

evidence from being enter in court. They denied my right under the 14 amendment

for due Process, U.S. Supreme Court

Brady v. Maryland 373 U.S. 83 (84, 85, 86-91)

STATE OF SOUTH CAROLINA
 COUNTY OF YORK
 IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
 CASE NUMBER 2012CP4601328

Wells Fargo Bank NA

Alice Roseboro
 Citibank South Dakota
 NA
 Founders Federal Credit
 Union

Alice L Roseboro
 Department of Revenue
 South Carolina
 LVNV Funding LLC

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: Court

Attorney for: Plaintiff Defendant
 Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON): Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit);
 Rule 43(k), SCRPC (Settled); Other: _____
- ACTION STRICKEN (CHECK REASON): Rule 40(j) SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other: _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):
 Affirmed; Reversed; Remanded; Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

ORDER

This order ends does not end the case.

Additional Information for the Clerk: _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
N/A		

If applicable, describe the property, including tax map information and address, referenced in the order: _____

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

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s/ Charles S. Bradford

2098

2/10/2014

Special Referee

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on , and a copy mailed first class or placed in the appropriate attorney's box on, to attorneys of record or to parties (when appearing pro se) as follows:

Thomas E. Lydon
PO Box 12519
Columbia, SC 29211

Milton Gary Kimpson
PO Box 12265
Columbia, SC 29211

Alice Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730-3007

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

David Hamilton

Court Reporter

David Hamilton - Clerk of Court

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

P. 6

APPEAL FROM YORK COUNTY
Court of Common Pleas

Charles S Bradford, Master and Special Referee

Case No. 2014-000346

Wells Fargo Bank na

Respondent

v.

Alice L Roseboro

Appellant

PROOF OF SERVICE

I appellant certify that I am sending the enclosed documents to the attorney for the respondent, Thomas E. Lydon at his address I have on record 1320 Main St 10th fl or at his P O Box 12519 Columbia, SC 29211. By U S Mail or personal service to be delivered with postage prepaid.

On 04/28/2014

Alice L. Roseboro
1852 Bon Rea Dr
Rock Hill, SC 29730
803-579-2331
Attorney for Appellant

Thomas E. Lydon
1320 Main St 10th Fl
P O Box 12519
Columbia, SC 29211
803-779-2300
Attorney for Respondent



THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS

Charles S. Bradford, Master and Special Referee

Case No. 2014-000346

Wells Fargo Bank

Respondent

v.

Alice Roseboro

Appellant

Designation of Matter Proposed
for Reply Brief

Alice Roseboro
1852 Bon Res Dr
Rock Hill, SC 29730
803-579-2331
Pro Se Attorney

Alice Roseboro

Proposed Designation of Matter Content
for Record of Appeals

- ① Judgment enter Against me on 02/10/2014
- ② References to Complaint filed 04/10/12
- ③ Reference to my Answered filed 05/07/12
- ④ Property Address subject to this foreclosure
- ⑤ Facts to Support Initial Briefing Info
- ⑥ Summary Judgment and Affidavit by Attorney
- ⑦ Proposed Orders of Sept 19, 13 and Jan 21, 2014
- ⑧ Master Reference Conflict of Interest
- ⑨ Hindrance inside and out of Court Tribune
- ⑩ Violation of Right for Due Process 14th and 15th Amendment.
- ⑪ Wells Fargo Visions and Values

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

P30F3

APPEAL FROM YORK COUNTY
Court of Common Pleas

Charles S Bradford, Master and Special Referee

Case No. 2014-000346

Wells Fargo Bank na

Respondent

V.

Alice L Roseboro

Appellant

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I appellant certify that I am sending the enclosed documents to the attorney for the respondent, Thomas E. Lydon at his address I have on record 1320 Main St 10th fl or at his P O Box 12519 Columbia, SC 29211. By U S Mail or personal service to be delivered with postage prepaid.

On 05/17/2014

Alice L. Roseboro
1852 Bon Rea Dr
Rock Hill, SC 29730
803-579-2331
Attorney for Appellant

Thomas E. Lydon
1320 Main St 10th Fl
P O Box 12519
Columbia, SC 29211
803-779-2300
Attorney for Respondent

Alice L Roseboro

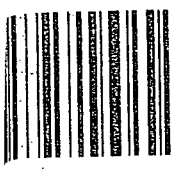
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MAY 19 2014

SC Court of Appeals

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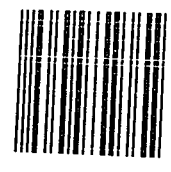
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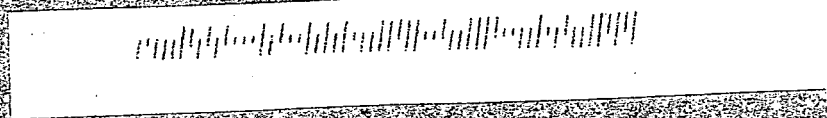
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PLACE STICKER AT TOP OF
OF THE RETURN ADDRESS

CERTIFIED



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FROM:

Alice LaRocca
1352 Ben Rd Dr
Rock Hill, SC
29735

TO:

SC App
SC Co
DISSE
Colum

Utility Mailer
10 1/2" x 16"