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MAY 28 2014

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

SC 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

Motion to Void Order Dated 5-14-14

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.**

1
2 Comes now, Geary-Tomas: Dooly, Appellant in said case to bring this MOTION TO
3 VOID ORDER Dated 5-14-14 based on gross errors contained in the Order.

4 **FACTS**

5 1. On 5-20-14 Appellant received an odd piece of mail in P.O.Box 3326. Odd, in that, the
6 envelope that contained the subject Order from SC Court of Appeals was unsealed
7 because it was draped over an identical envelope with a single page therein, BUT was
8 addressed to someone in Charleston, SC (I do not recall the name). The glue on my
9 addressed envelope was stuck to the face of the second envelope which had no postage. I
10 separated the two, sealed the second envelope and wrote on the face of it, "This envelope
11 was stuck to my mail received – please return to sender or forward.". Later I noticed that
12 the Order date was 5-14-14 and it only appeared in my box on 5-20-14 when the normal
13 mail time from Columbia to Spartanburg is ONE day. I do not know why the delay, but
14 would assume that the mistakenly "glued to" envelope had caused the mailing to be sent
15 to a USPS official for a decision as to what to do with the odd mailing with no postage. I
16 state this only to establish the date that Appellant received subject Order and to establish
17 that errors do occur, even with the SC Court of Appeals.

18 2. The Order states that Appellant "failed to provide proof of ordering the transcript.",
19 when, in fact, after a discussion with a Court employee I forwarded a copy of such proof,
20 see exhibit "A", such that the statement in the Order appears to be incorrect.

21 3. The Order further states that Geary-Thomas: Dooly has failed to "file an initial brief
22 and designation of matter..", when, in fact Appellant did file the document and that same
23 document was replied to by the Respondent. This document should be in the Court
24 records, however a copy of same is attached as Exhibit "B".

25 4. Immediately upon receipt of Order as in #1 above, and attached as Exhibit "C",
26 Appellant called Amelia, a court employee as assigned to this case to discuss these issues,
27 however I have not received and return call for whatever reason, and make this respectful
28 motion/request to resolve the matter so as to bring this to a just resolve.

29 **MOTION AND REQUEST**

30 **Therefore,** Appellant does hereby MOTION THE COURT to void the Order of 5-14-14,
31 and, respectfully, reinstate this appeal such that the next item in the process which is
technically due 5-24-14, would be due within 10 days of receipt of a response to this
motion and request.

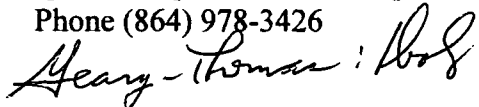
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May 22, 2014

Respectfully submitted,

geary-thomas, appellant, sui juris
c/o: post office box 3326
spartanburg, south carolina [29304]
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:

DOCUMENT(S)

- 1. Motion to Void Order dated 5-14-14.
- 2. Attachments "A", "B", and "C" as attachments to Item #1.

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: May 23, 2014

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

