

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF SPARTANBURG

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
Alleged Plaintiff(s)

MOTION TO INTERVENE

vs.

Nunc pro tunc
by Geary-Thomas: Dooly,
Intervener /Movant

Geary Thomas Dooly, Eleanor S, Dooly and
United States of America
Alleged Defendants

Intervener/Movant/Intervener, Geary-Thomas: Dooly, the natural person, hereinafter, Geary-Thomas Dooly, brings this MOTION TO INTERVENE

RECEIVED

JUN 17 2014

Geary-Thomas: Dooly's Timely Application by,

SC Court of Appeals

MOTION TO INTERVENE

Nunc pro tunc
IN THE ADMIRALTY

SCRCP 19 JOINDER OF PERSONS NEEDED FOR JUST ADJUDICATION, and
SCRCP 24 INTERVENTION

Geary-Thomas: Dooly, the natural person, and Movant herein, on this MOTION TO INTERVENE,

appears before this Honorable Court, by his MOTION TO INTERVINE, and moves this Honorable

Court for an Order; granting his MOTION TO INTERVENE, as of right, in the instant in rem

action, case # 2012-CP-42-3027, pursuant to South Carolina Rules of Civil Procedure #19 and

#24, and Applicant, Geary-Thomas: Dooly, the natural person is the only person having a lawful

interest in said property and his interests is not adequately represented by existing parties.

FILED
CLERK OF COURT
SPARTANBURG COUNTY
MAY 28 PM 7:35
HON. B. L. COKLEY

Geary-Thomas: Dooly claims an interest relating to the property, as him being the Consumer, natural Person, that is the subject matter of this in rem action case # 2012-CP-42-3027, in Admiralty, and is so situated that disposing of the action as a practical matter will impair or impede Geary-Thomas: Dooly's ability to protect His interest in the property, located at 690 Zion Hill Road, Spartanburg, South Carolina.

Geary-Thomas: Dooly, Intervener/Movant herein, moves this Honorable Court for an Order:

Geary-Thomas: Dooly be joined in this in rem action as Intervener/Movant, pursuant to SCRC 19 and SRSCP 24. This Court cannot determine the claim before it, Case # 2012-CP-42-3027, without prejudice to the rights of Geary-Thomas: Dooly. A complete determination of the claim Case # 2012-CP-42-3027 before this Court cannot be made without the presence of Geary-Thomas: Dooly, the natural person.

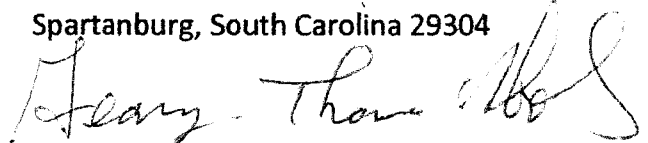
THEREFORE,

Geary-Thomas: Dooly, Intervener/Movant herein, MOTION TO INTERVINE must be granted, and Intervener/Movant herein, be joined in this action as Intervener/Movant, for the protection of Intervener/Movant's interest in said

property to be adequately represented, and for final claims to be properly adjudicated by this Court.

SEE: MEMORANDUM IN SUPPORT OF MOVANT'S MOTION TO INTERVINE

Geary-Thomas: Dooly, Intervener,
c/o Post Office Box 3326
Spartanburg, South Carolina 29304



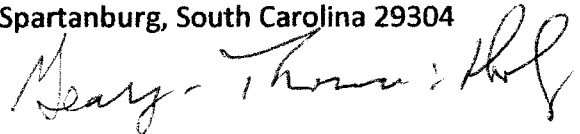
FILED
CLERK OF COURT
SPARTANBURG COUNTY
MAY 28 PM 1:35
HOPE BLACKLEY

CERTIFICATE OF SERVICE

I, Geary-Thomas: Dooly, do hereby certify, that I have read, and understand this filing, MOTION TO INTERVENE, to be true, correct, and not misleading, to the best of My knowledge and belief, and that a true and correct copy is filed with the Clerk of the Captioned Court, and that a copy is served on the Alleged Plaintiff, by mailing a copy to alleged Counsel of Record, Nelson Mullins Riley & Scarborough LLC et al, and specifically to the attention of Sarah R. Anderson and Giles M Schanen of alleged Counsel of Record, Nelson Mullins Riley & Scarborough, LLC. 104 South Main Street -9th floor, Greenville, South Carolina 29601.

Date:

Geary-Thomas: Dooly, Intervener/Movant
c/o Post Office Box 3326
Spartanburg, South Carolina 29304



FILED
CLERK OF COURT
SPARTANBURG COUNTY
2014 MAY 28 PM 1:35
M. HOPE BLACKLEY

s: Dooly
26
South Carolina
29304

CERTIFIED MAIL™



7013 2630 0001 0534 6159



US POSTAGE
\$ 09.04
Mailed From 29307
06/13/2014
031A 0004188866

LN
6-16

JENNY ABBOTT KITCHINGS,
CLERK OF COURT
S.C. COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA
29211

RECEIVED
JUN 17 2014
SC Court of App