

RECEIVED

JUN 17 2014

SC Court of Appeals

**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 [CT OF APPEALS # 2014-000600]

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

Geary-Thomas: Dooly, natural person in Admiralty

Intervener Appellant

MOTION TO SUPPLEMENT RECORD OF APPEAL

Geary-Thomas: Dooly, Intervener Appellant, sui juris
c/o post office box 3326
Spartanburg, South Carolina [29304]
Phone (864) 978-3426

NOTE: The Intervener Appellant is not pro se, is not educated in law, and is sui juris in all matters.

History, Facts, and Dates

1. On 5-14-14 The South Carolina Court of Appeals dismissed Appellate Case 2014-000600, and mailed said Order to Appellant due to certain "failures" which proved to be erroneous "failures".
2. Several attempts were made to contact The South Carolina Court of Appeals by phone but no timely return call was received. Therefore, on 5-23-14, Appellant filed a Motion to "Void Order" issued on 5-14-14 by The South Carolina Court of Appeals.
3. On 5-29-14 a 2nd Order was issued by The South Carolina Court of Appeals admitting the error. This 2nd Order also had an error in that the last statement stated, "Geary Thomas Dooly's, Appellant's Initial brief and designation of matter are due June 27, 2014." This was odd in that the whole issue was, did Appellant file those same filings. They were filed prior to the 5-14-14 Order of Dismissal by The South Carolina Court of Appeals.
4. On 6-2-14 a 3rd Order was issued by The South Carolina Court of Appeals. This 3rd Order also contains an error in that the last statement says, "The respondent's initial brief and designation of matter will be due 6-23-14.", when, in fact, respondent filed those documents on 4-11-14.
5. On 5-27-14, with the Appeal having been dismissed The South Carolina Court of Appeals via Order of 5-14-14, placing the Case 2012-CP-42-3027 back in the Court of Common Pleas of Spartanburg County, a "NOTICE OF DISPUTE Nunc pro tunc by Geary-Thomas: Dooly,

Intervener/Consumer" was filed into the record of Court of Common Pleas of Spartanburg County on 5-27-14, as attach.

6. On 5-28-14, with the Appeal still being dismissed via The South Carolina Court of Appeals Order 5-14-14, placing the Case 2012-CP-42-3027 back in the Court of Common Pleas of Spartanburg County, a "MOTION TO INTERVENE Nunc pro tunc by Geary-Thomas: Dooly, Intervener/Movant IN ADMIRALTY" was filed into the record of Court of Common Pleas of Spartanburg County on 5-26-14, as attached.

7. On 5-28-14, with the Appeal still being dismissed via The South Carolina Court of Appeals Order 5-14-14, placing the Case 2012-CP-42-3027 back in the Court of Common Pleas of Spartanburg County, a "MEMORANDUM IN SUPPORT OF MOVANT'S MOTION TO INTERVENE Nunc pro tunc by Geary-Thomas: Dooly, Intervener/Movant IN ADMIRALTY" was filed into the record of Court of Common Pleas of Spartanburg County on 5-26-14, as attached.

8. On 5-28-14, with the Appeal still being dismissed via The South Carolina Court of Appeals Order 5-14-14, placing the Case 2012-CP-42-3027 back in the Court of Common Pleas of Spartanburg County, a "COMPLAINT Nunc pro tunc by Geary-Thomas: Dooly, Intervener/Movant, IN ADMIRALTY" was filed into the record of Court of Common Pleas of Spartanburg County on 5-26-14, as attached. These documents are now a part of this record, and the Case 2012-CP-42-2012 has been intervened by Geary-Thomas: Dooly, natural person in

Admiralty, Intervener/Consumer against the Perpetrators, Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc., Asset-backed Pass-Through Certificates, Series2004-W11.

9. Geary-Thomas: Dooly, natural person, as a Consumer and Intervener/Movant, in the Admiralty has/is being harmed via multiple violations of US Code (as well as South Carolina parallel code) Chapter 41-Consumer Protection, Subchapter V –Debt Collection Practices (§§1692-1692p), and by "unconscionable conduct" pursuant to SC Fair Debt Collection Act Section 37-5-108.

THEREFORE,

Geary-Thomas: Dooly, natural person, as a Consumer and Intervener/Movant, in the Admiralty has entered this Case 2012-CP-42-3027 pursuant to South Carolina Rules of Civil procedure Rule 19 and 24, and is joined in this action by:

- a) South Carolina Rules of Civil Procedure Rule 19 and Rule 24, and
- b) the Rules of Admiralty, and
- c) South Carolina Fair Debt Collection Practices Act Section 37-5-108, et al, and
- d) 15USC§1692 et al.

FURTHERMORE,

Geary-Thomas: Dooly, natural person, as a Consumer and Intervener/Movant, in the Admiralty does hereby move The South Carolina Court of Appeals, pursuant to Rule 212(b) to:

- a) add Geary-Thomas: Dooly, natural person, as a Consumer and Intervener/Movant, in the

Admiralty, as a party to this Case 2012-CP-42-2012 in Appeal, and

- b) Supplement the Record of Appeal pursuant to Rule 212)b) with the attached four (4) filings that are on record in Court of Common Pleas of Spartanburg County, and
- c) Correct the 3rd Order re: 1. the timing, 2. which filing is due, 3. at what date, and 4. by whom, in view of the confusion, and
- d) make any ruling the Court deems appropriate under the circumstances herein.

June 13, 2014

Respectfully submitted,

Geary-Thomas: Dooly, natural person in Admiralty, as Consumer Intervener/Movant, sui juris
c/o P.O.Box 3326,
Spartanburg, South Carolina [29304]

Phone 864 978-3426

*Geary-Thomas: Dooly, natural person individually as Consumer /
movant, sui juris*

RECEIVED

JUN 17 2014

SC Court of Appeals

CERTIFICATE OF SERVICE

I, Geary-Thomas: Dooly, natural person in Admiralty, 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 Supplement Record of Appeal with attachments.

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

JENNY ABBOTT KITCHINAS
CLERK OF COURT
S. C. COURT OF APPEALS
PO BOX 11629 COLUMBIA SC 29211
VIA CERTIFIED MAIL #
7013-2630-0001-0534-6159

Date: June 13, 2014

Geary-Thomas: Dooly, natural person in Admiralty

Geary-Thomas: Dooly, natural person in Admiralty

29304

7015 2830 0001 0334 8137

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 2011

SC Court of App

