

RECEIVED

JUN 17 2014

SC Court of Appeals

STATE OF SOUTH CAROLINA

COUNTY OF SPARTANBURG

**Deutsche Bank National Trust Company, as
Trustee for Argent Securities Inc., Asset-Backed
Pass-Through Certificates, Series 2004-W11**
Alleged Plaintiff(s)

vs.

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

**IN THE COURT OF
COMMON PLEAS**

Case: **2012-CP-42-3027**

NOTICE OF DISPUTE
Nunc pro tunc
by Geary-Thomas: Dooly,
Intervener/Consumer

NOTICE OF DISPUTE

Geary-Thomas: Dooly, intervener/ consumer, pursuant to 15USC§1692g,
Fair Debt Collection Practices Act (“FDCPA”) hereby disputes
the alleged debt Plaintiff/Defendant claims in the above titled matter.

Therefore this Notice shall be deemed a request/demand for “verification”
and debt validation request as defined by 15 USC 1692(g)(1)(2)(5)(b) and
South Carolina Consumer Protection Act Statutes/Laws.

Geary-Thomas: Dooly, intervener/consumer hereby requests validation
pursuant to 15 USC§1692. Specifically, I dispute as to the identity of the
true owner (if any) of this alleged debt, the alleged amount due and owing.

FILED
CLERK OF COURT
SPARTANBURG COUNTY
2014 MAY 27 PM 1:47
M. HOPE BLAKEY

dispute all signatures appearing on Alleged Plaintiff's unauthenticated hearsay documents, and the Alleged Plaintiffs alleged authority and capacity to collect and or sue on behalf of the same.

Alleged Plaintiff are "debt collectors" as that term is defined by 15 USC§1692a (6). Alleged Defendant Geary-Thomas: Dooly, is a "consumer" as that term is defined by 15 USC§1692a(3). Alleged Plaintiff, Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc, DEBT COLLECTOR is attempting to collect a "household debt" as that term is defined by 15USC§1692a (5). Furthermore, in the original filing in this case, Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc. admitted being a DEBT COLLECTOR on or about page 17 of the filing as follows: "THIS IS AN ATTEMPT BY A DEBT COLLECTOR TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE."

Lastly, Defendants in reviewing their consumer credit reports, it was revealed, alleged Plaintiff, Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc, DEBT COLLECTOR is reporting an alleged mortgage debt account. I request Plaintiff to delete the inaccurate information immediately pursuant to 15 USC§1681 *et, al.* Parties must comply with the requests timely and completely. Failure to provide the

above documentation will result in Defendant Geary-Thomas: Dooly,
consumer, filing a counterclaim for damages accordingly.

Dated: MAY 27, 2014

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

Geary-Thomas: Dooly, ARB

FILED
CLERK OF COURT
SPARTANBURG COUNTY
2014 MAY 27 PM 1:47
M. HOPE BLACKLEY

CERTIFICATE OF SERVICE

I certify that the above document styled Notice of Dispute was served upon the defendant 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 et al at the address:
104 South Main Street -9th floor, Greenville, South Carolina 29601.

May 27, 2014

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

Geary-Thomas: Dooly, AR

FILED
CLERK OF COURT
SPARTANBURG COUNTY
2014 MAY 27 PM 1:47
M. HOPE BLACKLEY

3-8007
26
South Carolina
29304

7013 2630 0001 0534 6159

Mailed From ZIP
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

