

THE STATE OF SOUTH CAROLINA
In the Court of Appeals



APPEAL FROM BERKELEY COUNTY
Robert E. Watson, Master in Equity
Case No.: 2011-CP-08-02434
Appellate Case No. 2014-000696

RECEIVED
JUN 06 2014
SC Court of Appeals

Deutsche Bank National Trust Respondent

V.

Elmore, Eugene; Elmore, Gwendolyn Defendants

Of Whom Eugene Elmore, Gwendolyn Elmore is the Appellant

Caroline Richardson Glenn, Esq
BROCK & SCOTT, PLLC
3800 Fernandina Rd
Columbia, SC 29210
Telephone: (803) 454-3540

Deutsche Bank National Trust
60 Wall Street, 37th Floor
New York, New York 10005

BRIEF

For the reason why we are appealing Order that was signed on March 10, 2014, is because, we were not given equal rights under color of law. For in the Motion, Honorable Robert E. Watson, overlooked facts that stated we had Perfected Security Interest in our Motion for the Uniform Commercial Code Article 9.308-316 gives clear instructions and definition for how to Perfect Security Interest. For with this information we follow instructions on how to perfect our Security Interest, by given Public Notice of our Interest using Uniform Commercial Code 1 Financial statement which is one of the general rules for securing a Perfected Secured Interest. Found in UCC Article 9.312(b). For this claim pursuant to Revised Article 9 of the Uniform Commercial Code, an attached security interest prevails over a creditor using judicial process to obtain a lien on collateral. For the claim of our Security Interest in the property would be \$87,000.00 per year that we lived in at this location, which only covers

upkeep, maintenance and guard of property 24 hours, 365 days per year, and at minimum of \$8.00 per hour.

For the claim of Deutsche Bank not establishing authenticated documents nor having competent witness to testify, we believe that Deutsche Bank came into the court with unclean hands. FOR THIS CLAIM WE HAVE A PERFECTED SECURITY INTEREST AND ANY JUDGMENT THAT DEUTSCHE BANK IS AWARDED WOULD ONLY GIVE THEM JUNIOR STATUS.

: Eugene : Elmore
Autograph
Every Right Persevered

: Ewendolyn-Beverly : Elmore
Autograph
Every Right Persevered

STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY

CERTIFICATE OF MAILING
BRIEF

We hereby certify that we forwarded by Certified Mail Return Receipt Requested the attached BRIEF to the following locations on this 6th day of June, 2014:

Deutsche Bank National Trust
60 Wall Street, 37th Floor
New York, New York 10005

Caroline Richardson Glenn, Esq
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Columbia, SC 29210
Telephone: (803) 454-3540
[ATTORNEY FOR THE RESPONDENT]

RECEIVED
Eugene & Elmore
SC Court of Appeals

:Eugene: Elmore
Autograph
Every Right Persevered

:Gwendolyn-Beverly: Elmore
Autograph
Every Right Persevered

DATED: June 6, 2014