

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEALS FROM YORK COUNTY
Court of Common Pleas

172681

Charles S Bradford, Master and Special Referee
Case No: 2014-000346

Wells Fargo Bank na

Respondent

v

Alice L Roseboro

Appellant

PETITION FOR RECONSIDERATION

Alice L Roseboro
1852 Bon Rea Dr
Rock Hill SC 29730
803 579 2331
Pro Se Attorney

Alice L. Roseboro

RECEIVED

JUL 01 2014

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA

In The Court of Appeals

June 25 2014

APPEAL FROM YORK COUNTY

Court of Common Pleas

Charles S Bradford, Master and Special Referee

Case No: 2014-000346

Wells Fargo Bank na.

Respondent

v.

Alice L Roseboro

Appellant

ORDER/ Affidavit for No Opposition! Overlooked Hindrance To Me

I the undersigned move the court for a Petition of Reconsideration to Grant me a Judgment do to No Opposition!; by the Respondents since I filed my Appeals Case on Feb 21 2014 in this Appeals Court. **I the undersigned stated in my Affidavit under Oath I submitted to the court signed(effective May 20 2014 that the Respondents have never Made Any Objections to my case by Any means) No objections have been sent to my home and they have my home address, It's been the same for over 15 years. The suspicious motion filed after I was blocked out of my account on April 15 2014 needs to be denied, NO Opposition of Any Kind are Motion has been sent to me to answer, since I file my appeal. The judgment sent to me signed June 18 2014 has no merit. My sworn Oath sent May 22 2014 signed May 20 2014 gives true affirmation. I move by Order for the Court to Reversed this decision they sent me on June 20 2014, it has no merit do to No Opposition Ever! from the Respondent to my Appeals case. **The MG&C LLC law firm represented by Thomas E Lydon are the Only Law Firm who are council to this case.****

No one else and no other law firm are Company has Permission to Dismiss My Case, But
The Law Firm MG&C LLC represented by Attorney Thomas E Lydon who sign a
substitution for the previous Attorney Robert P Davis of Rogers Townsend & Thomas PC.
I the undersigned Move the Court by ORDER to explain in written Order by what
authority it granted there Dismissal since the Respondent MG&C LLC made No
Opposition ! are Reply by any Mail sent to me from there law firm. I appellant and
undersign hereby Move by ORDER for the Court to Grant me my Judgment as it has
been over 90 days passing with No Reply since I filed my Appeal, The Respondent MG&C
LLC and attorney Thomas E Lydon gave NO Opposition to my entering less than the
entire transcript filed on March 18 2014. The MG&C LLC and attorney Thomas E Lydon
gave No Opposition to my Initial Brief I filed on March 21 2014.

If the Respondents made a change in council in accordance with Rule 11(b) then they
Never have told me. No other law firm has the authority to dismiss my case. I Move the
Court by ORDER for this Dismissal to be Denied and the judgment enter against me be
Reversed. In accordance with Rule 208 for brief filings my Judgment Needs to be
Granted for a failure to reply . (See Attached Exhibit A Enclosed)

The Respondents by his No Opposition Reply and Silence did in fact Concur to all I allege,
I appellant by his Silence also Concur to all I stated and said, I undersigned hereby Make
Move by ORDER for the Court to stipulate and Grant My Judgment as stated in my
ORDER for Relief sent to the court in my last document for NO! Opposition Ever!...

Sincere Respect Honorable Judge John C Few

Alice L Roseboro

A handwritten signature in black ink that reads "Alice L Roseboro". The signature is written in a cursive style with a large initial "A" and a long, sweeping underline.

FORM 4

STATE OF SOUTH CAROLINA
 COUNTY OF YORK
 IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
 CASE NUMBER 2012CP4601328

Wells Fargo Bank NA	Alice Roseboro Citibank South Dakota NA Founders Federal Credit Union	Alice L Roseboro Department of Revenue South Carolina LVNV Funding LLC
---------------------	-----------------------------------------------------------------------------------	---------------------------------------------------------------------------------

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: Court	Attorney for: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Self-Represented Litigant
---------------------	-------------------------------------------------------------------------------------------------------------------------------------------

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRCP; Rule 41(a), SCRCP (Vol. Nonsuit);
 Rule 43(k), SCRCP (Settled); Other: _____
- ACTION STRICKEN (CHECK REASON):** Rule 40(j) SCRCP; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other: _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded; Other: _____

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

ORDER

This order ends does not end the case.

Additional Information for the Clerk: _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)
N/A		

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

s/ Charles S. Bradford

2098

2/10/2014

Special Referee

Judge Code

Date

For Clerk of Court Office Use Only

This judgment was entered on , and a copy mailed first class or placed in the appropriate attorney's box on, to attorneys of record or to parties (when appearing pro se) as follows:

Thomas E. Lydon
PO Box 12519
Columbia, SC 29211

Milton Gary Kimpson
PO Box 12265
Columbia, SC 29211

Alice Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730-3007

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

David Hamilton

Court Reporter

David Hamilton - Clerk of Court

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1:

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

The South Carolina Court of Appeals

Wells Fargo Bank, N.A., Respondent,

v.

Alice Roseboro a/k/a Alice L. Roseboro, Citibank South
Dakota, N.A., The South Carolina Department of
Revenue; Founders Federal Credit Union, LVNV
Funding, LLC; Defendants,

Of whom Alice Roseboro is the Appellant.

Appellate Case No. 2014-000346

ORDER

After careful consideration, Respondent's motion to dismiss is granted. In light of
→ our decision, we decline to act on Appellant's various motions before our court.
Accordingly, this matter is dismissed, and the remittitur will be sent as required by
Rule 221(b), SCACR.


FOR THE COURT

Columbia, South Carolina

cc:
Alice Roseboro
Thomas E. Lydon, Esquire

FILED
6/18/14

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEALS FROM YORK COUNTY
Court of Common Pleas

Charles S Bradford, Master and Special Referee
Case No: 2014-000346

Wells Fargo Bank na

Respondent

v

Alice L Roseboro

Appellant

Proof of Service

RECEIVED

JUL 01 2014

SC Court of Appeals

I appellant certify that the enclosed documents are being sent to the Respondent by US Mail
At the address I have on file. With postage prepaid for delivery as of this day.

06/30/14

MG&C LLC
Thomas E Lydon
1320 Main St 10 fl
Columbia SC 29201
Attorney for Council

Alice L Roseboro
1852 Bon Rea Dr
Rock Hill SC 29730
Pro Se Attorney

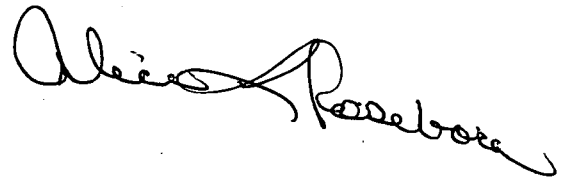


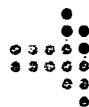
EXHIBIT A

(P.10F11)

Attorney For Council
Substitution

Alice L. Rosebow

P.1


ROGERS TOWNSEND
ATTORNEYS AT LAW

22D Executive Ct. Dr.
Columbia, SC 29226

Alice Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730-3007

POSTAGE WILL BE PAID BY ADDRESSEE
FIRST CLASS PERMIT NO. 2112
ROCK HILL, SC 29729

POSTAGE WILL BE PAID BY ADDRESSEE
FIRST CLASS PERMIT NO. 2112
ROCK HILL, SC 29729

TRANSMISSION VERIFICATION REPORT

2012CP4461328

P.2
TIME : 05/29/2012 14:48
NAME : ESC CHARLOTTE SOUTH
FAX : 7045656874
TEL : 7045656865
SER.# : BROE9J934364

DATE, TIME
FAX NO./NAME
DURATION
PAGE(S)
RESULT
MODE

05/29 14:48
18033437013
00:00:20
01
OK
STANDARD
ECM



Job Link Career Center

7140 FOREST Point Blvd., Suite A
CHARLOTTE, NC 28217

LOAN# [REDACTED] 2992

To: Rogers Townsend From: Alina Roseboro
Fax: 803-343-7013 Pages: 1
Phone: 803-744-4444 Date: 5/29/12
Re: _____ CC: _____

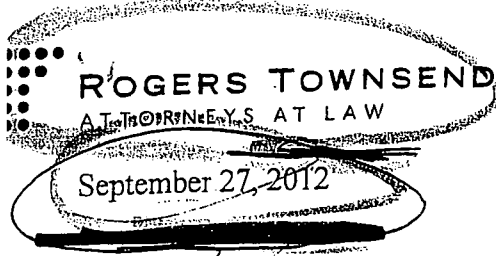
• Comments:

Request for amount needed to
bring account current in
letter-form for mortgage assistance
Address on file is correct
P.O. P.

P.3

ROGERS TOWNSEND & THOMAS, PC
DEFAULT SERVICES DEPARTMENT

POST OFFICE BOX 100200 (29202)
220 EXECUTIVE CENTER DRIVE
COLUMBIA, SOUTH CAROLINA 29210
P 803.744.4444 F 803.343.7013
WWW.RTT-LAW.COM



ROGERS TOWNSEND
ATTORNEYS AT LAW

September 27, 2012

2012-EP-46-1328
Almost 4 months

Alice Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730-3007

Re: Wells Fargo Bank, N.A. vs Alice Roseboro
Our File No. 013263-00937

FOR SETTLEMENT PURPOSES ONLY.

Dear Sir/Madam:

ROGERS, TOWNSEND & THOMAS, PC IS A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. This letter is in response to your request for a reinstatement amount.

It is our understanding that you intend to reinstate your loan. To reinstate your loan on or before October 24, 2012, we estimate that the reinstatement amount will be \$16,665.96. This amount is itemized as follows:

14 payments @ 486.94 totaling	Incorrect →	\$6,817.16
10 payments @ 516.23 totaling	Incorrect →	\$5,162.30
Late Charges		\$220.12
Pending Late Charges	Payments are	\$14.44
Corporate Advances	\$ 486.30	\$2,406.00
Anticipated Foreclosure Attorney Costs and expenses		\$736.00
Anticipated Foreclosure Attorney Fees		\$1,310.00
LESS Suspense Balance		\$0.06
Total Amount Necessary to Reinstatement your loan on or before October 24, 2012		\$16,665.96

Please note that this estimated reinstatement quote expires on October 24, 2012.

ATTORNEY TRUST OR ATTORNEY ESCROW CHECKS WILL NOT BE ACCEPTED.

The reinstatement figures listed above include items that have been paid by the Plaintiff or incurred by our law firm and items that are currently due or are anticipated to become due through October 24, 2012. In constructing this reinstatement, we have included anticipated additional fees and costs in order to provide you with an estimated reinstatement good through October 24, 2012. These anticipated fees and costs merely represent an estimate as to what our actual fees and costs will be if you reinstate the loan by no later than October 24, 2012. Please understand that any estimated or anticipated charges contained in this letter will not be binding on this firm or on the Plaintiff, and that the account remains liable for all fees and costs incurred after today even if those items are not included as part of the estimated amounts set forth in this letter. Please be advised that the reinstatement amount is subject to final verification by the Plaintiff. You will be responsible to reimburse the Plaintiff or its servicer if it pays other taxes, insurance or miscellaneous expenses permitted by law.

In the event we receive payment for legal fees or costs in excess of the amount you actually owe, those excess funds will be returned to you by mail at the property address that is subject of this action or the address provided to us by you in writing.



ATTORNEYS AT LAW

Reply To
THOMAS E. LYDON
Direct Dial: (803) 227-2292
tlydon@mgclaw.com
COLUMBIA

P.S
RECV
IN MAIL
12-21-12

December 13, 2012

Honorable David Hamilton
York County Clerk of Court
P.O. Box 649
York, SC 29745

Re: *Wells Fargo Bank v. Alice Roseboro, et al.*
Civil Action No. 2012-CP-46-1328

Dear Mr. Hamilton:

Enclosed please find a proposed Consent Order for Substitution of Counsel in connection with the referenced matter. Also enclosed is a check in the amount of \$25.00 to cover the filing fee for the motion.

I would appreciate it if you would forward the Order to the administrative judge for his signature. Thank you for your assistance.

Sincerely,

Thomas E. Lydon

Encl.

cc: Ms. Alice L. Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)

IN THE COURT OF COMMON PLEAS

Wells Fargo Bank, N.A.,)
)
Plaintiff,)
vs.)

Civil Action No. 2012-CP-46-1328

P.6

CONSENT ORDER FOR
SUBSTITUTION OF COUNSEL

Alice Roseboro a/k/a Alice L.)
Roseboro, Citibank South Dakota,)
N.A., The South Carolina)
Department of Revenue; Founders)
Federal Credit Union, LVNV)
Funding, LLC;)
)
Defendants.)

Upon motion of Thomas E. Lydon, with the consent of Robert P. Davis, and in accordance with Rule 11(b) of the South Carolina Rules of Civil Procedure,

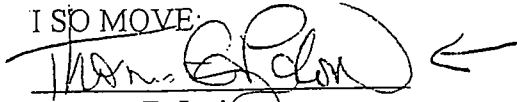
It is ORDERED that Thomas E. Lydon is hereby substituted for Robert P. Davis as counsel for Plaintiff Wells Fargo Bank, N.A. in this matter.

AND IT IS SO ORDERED.

Presiding Judge
York County Court of Common Pleas


_____, South Carolina
_____, 2012

I SO MOVE:



Thomas E. Lydon
McAngus, Goudelock & Courie, LLC
Post Office Box 12519
Columbia, South Carolina 29211

I CONSENT:


Robert P. Davis (Bar #74070)
Rogers, Townsend & Thomas, PC
Post Office Box 100200
Columbia, South Carolina 29202
Phone: 803-744-4444

P2



MERIDIAN BUILDING
1320 MAIN STREET
10TH FLOOR
POST OFFICE BOX 12519
COLUMBIA, SC 29211-2519

TO:

20741.12044/TEL/rsr
Alice Rosabono
1852 Bon Rea Drive
Rock Hill, South Carolina 29730



02 JAN 2000 4635284 AUG 14 2003
MAILED FROM ZIP CODE 29201
\$01:520
UNITED STATES POSTAGE
FIRST CLASS
PERMIT NO. 1000
COLUMBIA, SC

Reply To
THOMAS E. LYDON
Direct Dial: (803) 227-2292
tlydon@mgclaw.com
COLUMBIA

August 14, 2013

Honorable David Hamilton
York County Clerk of Court
P.O. Box 649
York, SC 29745

Re: *Wells Fargo Bank v. Alice Roseboro, et al.*
Civil Action No. 2012-CP-46-1328

Dear Mr. Hamilton:

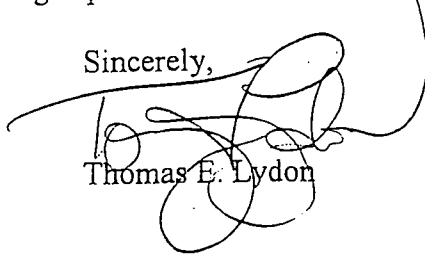
Enclosed please find the original and one copy of the following:

1. Motion for Order of Reference;
2. Motion for Summary Judgment;
3. Affidavit of Amanda Weatherly.

Also enclosed is a check in the amount of \$50.00 to cover the filing fee for the motions. Please file the original of each document and return clocked-in copies to me in the envelope provided.

By copy of this letter, I am serving copies of the motions and affidavit on the defendant.

Sincerely,



Thomas E. Lydon

Encl.

cc: Ms. Alice L. Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730

CASE HISTORY FOR CASE 2012CP4601328

P.9

11/2013	12:41 PM	Order of Reference
1/13/2013	12:15 PM	Filing recorded: Notice of Hearing & Certificate of Service
10/2012	11:56 AM	Received payment of \$150 from Rogers Townsend & Thomas, Pc for Wells Fargo Bank NA. Printed receipt #293337.
2/21/2012	10:59 AM	Received payment of \$25 from Mcangus Goudelock & Courje Llc for Wells Fargo Bank NA. Printed receipt #299413.
5/2013	11:54 AM	Received payment of \$50 from Mcangus Goudelock & Courje Llc for Wells Fargo Bank NA. Printed receipt #304987.
2/21/2012	12:00 AM	C46KRAWLIN recorded the following Case Note: sent order to Judge Alford
2/26/2012	12:00 AM	C46LSHILLI recorded the following Case Note: Moton & Proposed Order Information Returned to Ms. Roseboro with return slip advising she will need to provide a Motion Coversheet and pay gthc \$25.00 Motion Fee.
8/2013	12:00 AM	C46LSTRAIT recorded the following Case Note: Motion MOFFREE - Motion & Motion Fee For Summary Judgment/Cert of Service added to Roster: 7 - Motions Roster for September 19, 2013 (Judge Kimball @ Equity Court) Roster Begin Date 2013-09-19 - End Date 2013-09-19
5/2013	12:00 AM	C46LSTRAIT recorded the following Case Note: Will be scheduled during October NJ term before circuit judge
1/2013	12:00 AM	C46LSTRAIT recorded the following Case Note: Rescheduled for 9/17/13 @ 1:30 pm at Equity Court
2/2013	12:00 AM	C46LSTRAIT recorded the following Case Note: Motion MOFFREE - Motion & Motion Fee For Order of Reference & Cert of Ser added to Roster: 15 - Non-Jury Roster Week of October 8, 2013 (Judge Hayes) Ag. Building Roster Begin Date 2013-10-08 - End Date 2013-10-11
9/2013	12:00 AM	C46LSTRAIT recorded the following Case Note: MOTION HEARD
11/2013	12:00 AM	C46LSMITH recorded the following Case Note: Master In Equity referral request generated for 46003 - York County Master In Equity
16/2013	12:00 AM	C46LSTRAIT recorded the following Case Note: Charles Bradford has been appointed special referee and will hear all matters pertaining to this case
4/2014	12:00 AM	C46LSHILLI recorded the following Case Note: Documents sent to Clerks office certified mail.....no return copies or envelope included.

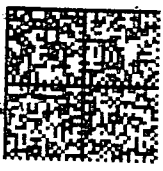
MCG
McAngus Goudelock
Courie
LLC

ATTORNEYS AT LAW

1320 MAIN ST. ◻ 10TH FLOOR ◻ P.O. Box 12519 ◻ Columbia, SC 29211

2204 2006306252

20741.12044/TEL/75R
Ms. Alice Roseboro
1852 Bon Rea Drive
Rock Hill, South Carolina 29730



UNITED STATES POSTAGE
02 1A \$ 00.46⁰
0004635284 JAN 21 2014
MAILED FROM ZIP CODE 29201

Received ←
01/23/2014
2ND
Proposed
Order

P.10

P.H

REPLY TO
THOMAS E. LYDON
DIRECT DIAL 803-227-2292
tlydon@mgclaw.com
COLUMBIA

January 21, 2014

Charles S. Bradford, Esquire
Post Office Box 977
York, SC 29745

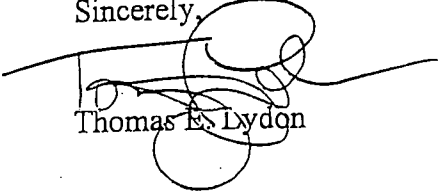
Re: *Wells Fargo Bank v. Alice Roseboro, et al.*
Case No. 2012-CP-46-1328

Dear Mr. Bradford:

Enclosed please find a proposed Order, which I believe accurately reflects your rulings at the hearings on January 10, 2014. Also enclosed is a proposed Notice of Hearing: As you instructed, the Notice of Hearing states that the foreclosure hearing in this matter will be held on March 19, 2014, at 2:00 p.m.

If the proposed Order and Notice are acceptable, please sign them and mail them back to me in the envelope provided. I will then file them with the clerk of court and serve them on all parties to this action.

Sincerely,


Thomas E. Lydon

cc: Ms. Alice Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730

