

RECEIVED

IN THE STATE OF SOUTH CAROLINA

JUL 18 2014

July 11, 2014 SC Court of Appeals

South Carolina Court of Appeals

P. 10 of 1

Clerk of Court Office

To: * Jenny A. Kitchings

Post Office Box 11629

Columbia, SC 29211

Re: Wells Fargo Bank Respondent v. Alicia Roseboro Appellant

Dear Ms. Jenny Clerk of Courts:

* Please add new telephone No. 803 524-1122

to your files and delete old No. 579-2331

Also add my Reply Brief back, for No Opposition.

The "mgc" is "NOT A PARTY TO COUNCIL" pursuant to Rule 11b.

Very Truly Yours,

Alicia Roseboro

cc:

* Attorney on Council

Thomas E. Lydon

M&C LLC

(You should have a copy of my No Reply) sent for No Opposition as I told you under my sworn Oath)

* Please correct to new phone # above

RECEIVED

JUL 18 2014

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

July 11, 2014

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS

RI OF 12

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

Wells Fargo Bank, NA

Respondent

Alice L. Roseboro vs

Appellant

Hindrance And Contempt / ON DISMISSAL

ROSEBORO ORDER TO COURT

Alice L. Roseboro
1852 Bon Rea Dr
Rock Hill, SC 29730
803-524-1122
Pro Se Attorney

Alice L. Roseboro

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

P. 2

APPEAL FROM YORK COUNTY
Court of Common Pleas

Charles S. Bradford, Master and Special Referee
CASE NO: 2014-000346

Wells Fargo Bank NA

Respondent

Alice L. Roseboro

v.

Appellant

NEW EVIDENCE

Objection to Dismissal / Outside Hindrance

I Appellant hereby state do to the Hindrance
caused by the Respondents Attorney in sending to
me by US mail a Reply to my Appeals Case Post

Mark dated June 17 2014 received in my

Mailbox on June 19, 2014 from a "Outside

Firm" Label "mge". This "mge" does NOT have

the legal right pursuant to Rule 11b violation

to "dismiss my Appeals Cases" I Object to

to the Dismissal of my Appeals Case. I Object

to the Appeals Court allowing a "OUTSIDE LAW

Firm "mpe" to Dismiss My Case. " As I stated

In my Petition for Reconsideration MG&C LLC

under the direction of Attorney Thomas E. Lydon

are the only ones signed on by a substitution

of counsel to Address My Appeals Case by

way of a paid PROPOSED ORDER paid for by

MG&C LLC Lawfirm. As the *Exhibit* A P.4-10

sent on June 30, 2014 verified with the Petitions

As I so stated in my Sworn Oath on May 20, 14

The Respondents had Never made a Reply to my Appeals

Case or sent ANY documents to my home since I

filed my Appeals Initial Brief on Mar 21, 2014.

They Never sent ANY Objection to my Appeal

from the MG&C LLC Lawfirm under the direction

of council to Respondent Thomas E Lydon to my
home, I would have the envelope as proof post
mark IF they made a Reply. And I assure
you the Appeals Court would have gotten a
Reply from me on Any Answer sent by the
Respondents pursuant to Rule 208 for Replies
in the time allowed. " The court never got a ANSWER
on a Reply by me from MG&C LLC and Attorney
because MG&C LLC and Attorney Never sent a
Reply. " But the court Did get a NO Reply!
from me do to NO Opposition by the Attorney
Thomas E Lydon who is on Legal Council to
Represent MG&C LLC as I recall pursuant to
Rule 11b; The "mgc" Lawfirm are Agency
he used to Dismiss My Case " Alleged ^{ON} 4/18/14 " is
" NOT A PARTY Council " pursuant to Rule 11b.

P.5
ON Consent forms he signed and noted as
filed with the Court of Common Pleas on
Case 2012-CP-46-1328 ANSENT in Exhibit A
Excerpts AGAIN from previous Petition. " See
Exhibit B¹⁴ for noted Hindrances by Attorney
on Reply sent by US MAIL to my home post
Mark June 19, 2014 received June 19, 2014
ON A "MGC" Law firm or group. ON Feb 7, 14
AND Mar 5, 14 the Attorney use "MGC" Law firm
to make reference to the Mar 19, 14 hearing
and canceling. During that 27 days span, he never
sent in a Substitution of council and notified me
on any changes to the Law firm he represented
and signed under MG&C LLC. I already cancel
to attend hearing on Mar 19, 2014; since I filed
my APPEAL in the time required; pursuant to Rule 208.

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I waited from Feb 7, 2014 letter he sent
upto 30 days later, to get a Reply ON
on substitution of council pursuant to Rule
11b of civil procedures like he did in Dec
2012 by way of a Proposed Order; but nothing
came to my mailbox concerning any substitution
of council from MGB & LLC and Attorney for
council Thomas E. Lydon. As of Mar 7, 2014

the "mge" was flagged in my file as "Not a
Party to Council for respondent Wells Fargo Bank."

The yellow Envelope sent to me from law firm
"mge" on June 19, 2014 post mark June 17, 2014
was return to sender, for a NO Opposition! being
untimely sent, and in Default pursuant to Rule 208
And most of all pursuant to Rule 11b being in

violation of civil procedures for a substitution
of council. My research done shows "mgc"
is a Real Estate Law firm that occupies same
building location in Columbia, SC. I "Allege"
several law firms may occupy that building
since it has 10 floors. But regardless ten floors
or just one, the "mgc" legal group is "NOT
a party to Council for Respondent pursuant to Rule
11b" AND verified on court record by way of PAID
Proposed Orders signed by the Attorney on Consent
form and paid for by MG&C LLC Law firm and
represented by Attorney Thomas E. Lydon signature
of approval. I appellant hereby make Moves
by a ROSEBUD ORDER to the Court to
reverse the Dismissal on ORDER dated 6/18/14
do to "No Opposition" Ever from MG&C LLC AND

(P. 8)

Attorney Thomas E. Lydon pursuant to rule 208.

I hereby make move by The ROSEBORD ORDER

To Grant me my Judgment deem just and

Proper pursuant to Rule 208 AS I stated in

my ORDER sent to the Court post mark June

5, 2014 by U.S. MAIL and to Attorney for the

Respondent, Thomas E. Lydon for NO Opposition!

The "mgc" Law Real Estate Firm is NOT A Party

to Council pursuant to Rule 11b. civil procedure

*
See Exhibit B

*
To the Court, AS I stated before, for No Opposition!

the Respondents, by their silence¹¹ They concurred to all

I allege and stated in my Briefs; By their silence I

Concur; I hereby make move by the ROSEBORD

ORDER for the Court to stipulate and grant my

Petition for No Opposition/ and my Order for Relief I sought.

(P. 9)

IN CONCLUSIONS WELLS FARGO BANK REPRESENTED
ATTORNEY THOMAS E. LYDON IN OVER 100 DAYS
AND PASSING UP TO JUNE 19, 2014 OF SENDING ME
HIS ANSWER TO MY APPEAL CASE I FILED BY U.S. MAIL
"I ALLEGE" HE INTENTIONALLY USED AN OUTSIDE LAW FIRM
"MGC", THAT IS NOT A PARTY TO COUNCIL PURSUANT
TO RULE (11b) OF CIVIL PROCEDURES, USING "MGC" IN HIS
REPLY IN DEFAULT PURSUANT TO RULE 208, AND WAS
IN FACT UNTIMELY SENT. "I ALLEGE"
THE ATTORNEY FAILED TO FOLLOW
RULE (11b) [THE RESPONDENTS NO OPPOSITION] BY THE NEW
COUNCIL MGC LLC AND ATTORNEY THOMAS E. LYDON PUTS
THEM IN DEFAULT AND THE NEW LAW FIRM "MGC" HE
USED IS NOT A PARTY TO COUNCIL PURSUANT TO RULE (11b).
I APPELLANT MOVE BY ORDER FOR THE COURT TO
ANSWER MY PETITION FOR RECONSIDERATION. IN THE
LIGHT OF NEW EVIDENCE AND GRANT MY JUDGMENT. AND

Reverse The Dismissal Order filed do to

fraud with a outside Lawfirm by there ON

Attorney AKA "mge", the "mge" is not a

party to council. I Appellant also object

the Unjust harassment by the Respondent

since I filed my Appeals Cases They have

sent a white lady and man to my home about

twice a month from March-June 30 2014.

Telling me my house is going to be for rent

and trying to get me to go call and go thru

another process, (I allege for there filing under

wrong Bank in court) There constant harassment

coming to my home and sending notes In the

mail, has caused my Blood Pressure to go up, (I

don't have health Ins.) I have headaches about

everyday, and my Blood Pressure when up makes me

Dizzy. " I told the man and lady on June 30, 14

P.11

not to come back to my house ANYMORE"
my house is not for rent, as I told them
that on April 2, 2014. I would have filed
a motion to compel/with Affidavit for causing
me emotional Distress, but I did not have
the funds to pay the \$2500⁰⁰ requires by the
Supreme Court. The attorney filed two
Proposed Orders free on Sept 19 2013 and on
Jan 21, 2014 both signed by Judges on Sept 20
and Jan 23, before I could comment, Rules 5 b(3)
violation of civil procedure and Supreme Court Rules
to pay for all motions and Proposed Orders. I ask the
Court for a prayer of additional relief it deems
Just and Proper for Harassment by Respondents.

*See Exhibit B Rule 11b violation
Alien Resistor Rule 208 violation

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

P. 12
RECEIVED

JUL 18 2014

SC Court of Appeals

PROOF OF SERVICE

I appellant certify that I am sending the enclosed documents to the attorney for the respondent, Thomas E. Lydon at his address I have on record 1320 Main St 10th fl or at his P O Box 12519 Columbia, SC 29211. By U S Mail or personal service to be delivered with postage prepaid.

On 07/16/2014

Alice L. Roseboro
1852 Bon Rea Dr
Rock Hill, SC 29730
803-524-1122
Attorney for Appellant

MG&C LLC
Thomas E. Lydon
1320 Main St 10th Fl
P O Box 12519
Columbia, SC 29211
803-779-2300
Attorney for Respondent

Alice L. Roseboro

EXHIBIT B

P. 1 OF 8

“mgc”

The “mgc” Law Firm the attorney used for
a reply to my appeal case filed Feb 21, 2014
is NOT A PARTY TO COUNCIL” for the

Respondent pursuant to Rule 11b of civil
procedures and proposed order signed as

noted already in Exhibit A attached
with updated remarks. The “mgc” Law

group does not have the legal authority
to dismiss my appeals cases Rule 11(b)

The facts remain the same MGC LLC
and attorney Thomas E Lydon gave NO opposition

period to my appeals case.
Rule 208 attached*

UNITED STATES POSTAGE
INTERNET BROWSE
\$ 01:520
02 1A
0094635284 AUG 14 2013
MAILED FROM ZIP CODE 29201

P.2

P.2

MG&C
McAngus Coudelock & Co. LLC
ATTORNEYS AT LAW

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

TO:

20741.17044/TEL/rsr
Alice Rosboro
1852 Bor Rea Drive
Rock Hill, South Carolina 29730

Added Note
07-11-2014
Rule 11b
Party signed
to Council
by Attorney
MG&C LLC

(21)

*Added
07-11-2014
UP Date Note
Rule 11b
NOT A Party
Is Counsel for
Respondents

Atty: THOMAS E LYDON

mqc
P.O. Box 12519
Columbia, SC 29211-2519

20741.12044/TEL/rwc
Ms. Alice Roseboro
1852 Bon Rea Drive
Rock Hill, SC 29730

DEFENSE
LANTIER
STEWART
sent 06/17/2014
Present 06/19/2014

SECRET
TO BARN
SENDER

Update Note
July 11, 2014
See Exhibit -
*A ALSO

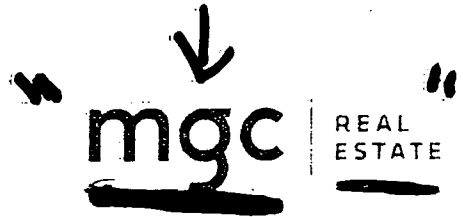


Contact (<http://mgcrealestate.com/contact/>) Support (<http://mgcrealestate.com/support-staff/>)

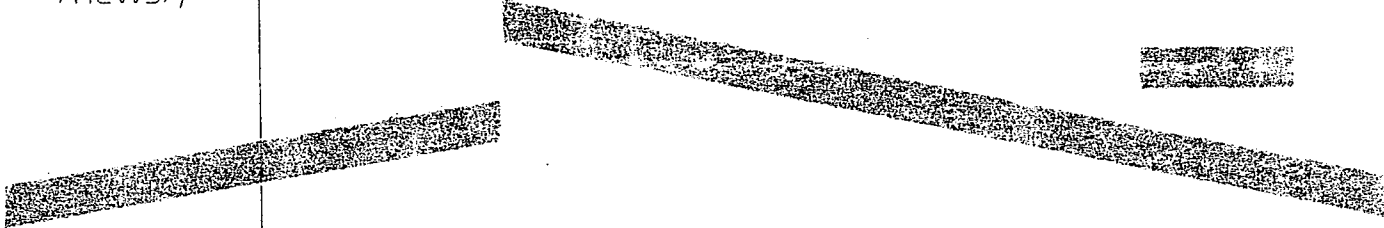
P.4

Services (<http://mgcrealestate.com/services/>)

Attorneys (<http://mgcrealestate.com/attorneys/>)



News & Events (<http://mgcrealestate.com/news/>)



Let us open a door
for you.



The **McAngus Goudelock & Courie Real Estate** group serves commercial and residential clients from six offices across South

(<https://www.facebook.com/MGCLawRealEstate>)

<http://mgcrealestate.com> Carolina.



Contact (<http://mgcrealestate.com/contact/>) Support (<http://mgcrealestate.com/support-staff/>)

P.5

Services (<http://mgcrealestate.com/services/>)

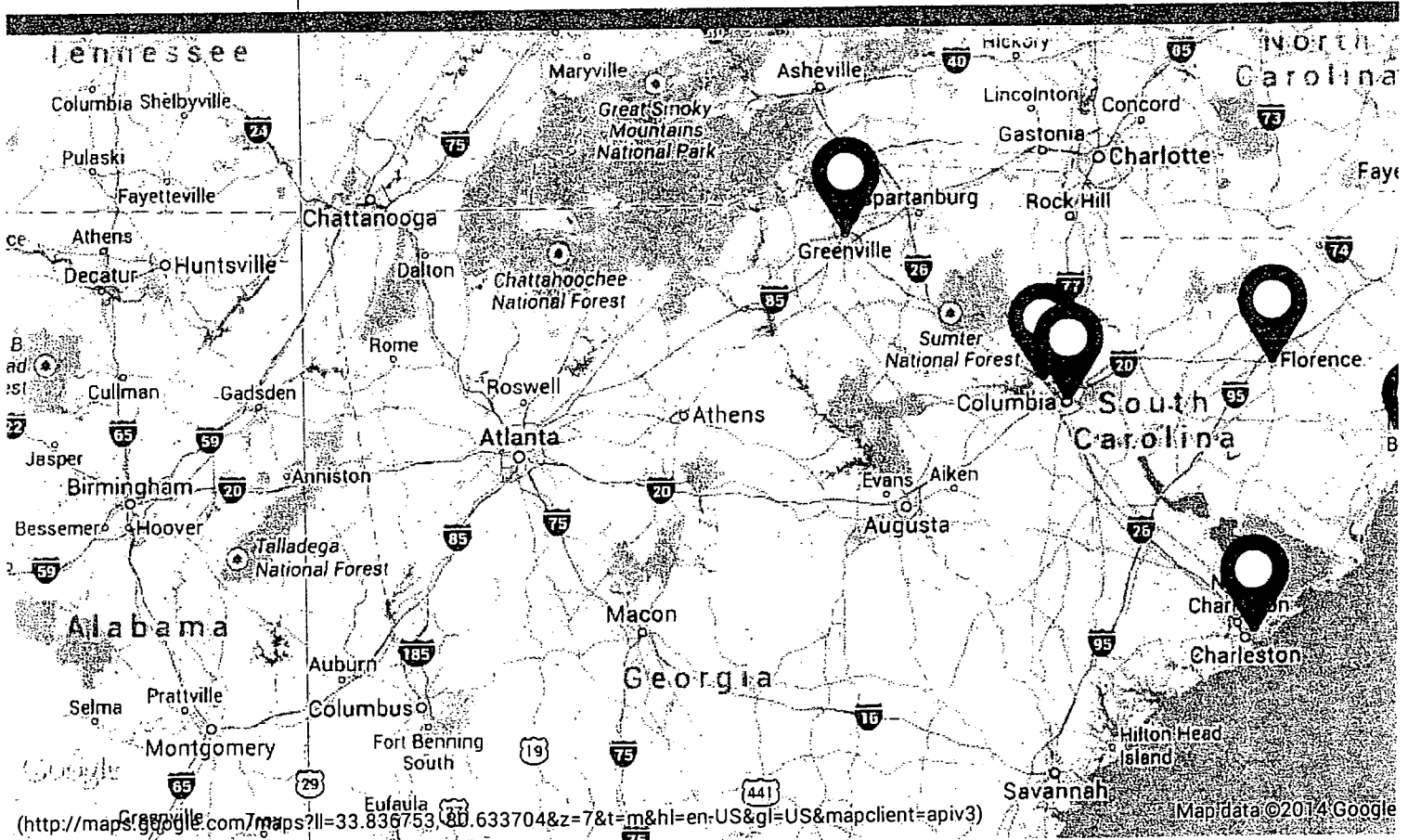
Attorneys (<http://mgcrealestate.com/attorneys/>)



(<http://mgcrealestate.com>)

News & Events (<http://mgcrealestate.com/news/>)

Contact



(<http://maps.google.com/maps?ll=33.836753,-80.633704&z=7&t=m&hl=en-US&gl=US&mapclient=apiv3>)

Mapdata ©2014 Google

MGCSC

McAngus Goudelock Courie LLC

ATTORNEYS AT LAW

1320 Main Street 10th Floor P.O. Box 12519 Columbia, SC 29211

P6

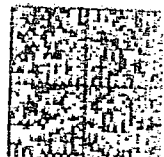
mgc

POST OFFICE BOX 12519
COLUMBIA, SC 29211

CEO update 07/15/14
~~No Rule 11b~~
 Notice sent
 For A change
 mgc
 Council
 AS of
 03/07/14
 ?
 E1a9
 Alert?

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

20741.12044/TEL/rst
 Ms. Alice L. Roseboro
 1852 Bon Rae Drive
 Rock Hill, South Carolina 29730



UNITED STATES POSTAGE
 \$00.450
 02 14
 0004535284 MAR05 2014
 MAILED FROM ZIP CODE 29211



UNITED STATES POSTAGE
 \$00.480
 02 14
 0004535284 MAR05 2014
 MAILED FROM ZIP CODE 29201

Received

03/17/14

March
 Hearing
 Canceled

297300007 R027

**RULE 208
INITIAL BRIEFS**

P. 7

(a) Time for Serving and Filing Initial Briefs.

(1) Brief of Appellant. Within thirty (30) days after receiving the transcript or, if no transcript is ordered, within thirty (30) days after serving the notice of appeal, appellant shall serve one copy of his brief on all parties to the appeal, and file with the clerk of the appellate court one copy of the brief with proof of service.

(2) Brief of Respondent. Within thirty (30) days after service of appellant's brief, respondent shall serve one copy of his brief on all parties to the appeal and file with the clerk of the appellate court one copy of the brief with proof of service.

(3) Reply Brief. An appellant may file and serve a brief in reply to the brief of respondent. If a reply brief is prepared, appellant shall, within ten (10) days after service of respondent's brief, serve one copy of the reply brief on all parties to the appeal and file with the clerk of the appellate court one copy of the reply brief with proof of service.

(4) Failure to File. Upon the failure of the appellant to file and serve his brief within the time prescribed, the clerk of the appellate court shall sign an order dismissing the appeal, and the appeal shall not be reinstated except as provided by Rule 260. Upon the failure of respondent to timely file a brief, the appellate court may take such action as it deems proper.

b) Content. The initial briefs under this Rule and the final briefs under Rule 211 shall contain:

(1) Brief of Appellant. The brief of appellant shall contain under appropriate headings and in the order here indicated:

(A) Table of Contents and Cases. A table of contents, with page references, and a table of cases (alphabetically arranged), statutes, and other authorities cited, with references to the pages of the brief where they are cited.

(B) Statement of Issues on Appeal. A statement of each of the issues presented for review. The statement shall be concise and direct as to each issue, and may be stated in question form. Broad general statements may be disregarded by the appellate court. Ordinarily, no point will be considered which is not set forth in the statement of the issues on appeal.

(C) Statement of the Case. The statement shall contain a concise history of the proceedings, insofar as necessary to an understanding of the appeal. The statement shall not contain contested matters and shall contain, as a minimum, the following information: the date of the commencement of the action or matter; the nature of the action or matter; the nature of the defense or of the response; the action of the court, jury, master, or administrative tribunal; the date(s) of trial or hearing; the mode of trial; the amount involved on appeal; the date and nature of the order, judgment or decision appealed from; the date of the service of the notice of appeal; the date of and description of such orders, judgments, decisions and proceedings of the lower court or administrative tribunal that may have affected the appeal, or may throw light upon the questions involved in the appeal; and any changes made in the parties by death, substitution, or otherwise. Any matters stated or alleged in appellant's statement shall be binding on appellant.

(D) Argument. The brief shall be divided into as many parts as there are issues to

presented. At the head of each part, the particular issue to be addressed shall be set forth in distinctive type, followed by discussion and citations of authority. A party may also include a separate statement of facts relevant to the issues presented for review, with reference to the record on appeal, which may include contested matters and summarize the party's contentions.

P. 8

(E) Conclusion. A short conclusion stating the precise relief requested.

(2) Brief of Respondent. The brief of respondent shall conform to the requirements of Rule 208(b)(1)(A)-(E), except that a statement of the issues or of the case need not be made unless the respondent is dissatisfied with the statement of the issues or of the case by appellant. If a respondent does not include his own statement of the case, he shall be bound by the matters stated or alleged in appellant's statement of the case. If a respondent does include his own statement of the case, he shall be bound by the matters stated or alleged in his statement of the case. Respondent's brief may also contain argument asking the court to affirm for any ground appearing on the record as provided by Rule 220(c).

(3) Reply Brief. All reply briefs shall contain a table of contents, with page references, and a table of cases (alphabetically arranged), statutes, and other authorities cited, with references to the pages of the reply brief where they are cited.

(4) References to Record. The brief shall contain references to the transcript, pleadings, orders, exhibits, or other materials which may be properly included in the Record on Appeal [see Rule 210(c)] to support the salient facts alleged. References shall also be made to where relevant objections and rulings occurred in the transcript. In the initial briefs, these references should be to the page and line number of the transcript prepared by the court reporter or by the page of the material to be referenced; e.g., Answer p. 7, Motion for Judgment p. 2, Transcript p. 231. Intelligible abbreviations may be used. After the Record on Appeal is prepared, these references shall be revised as provided by Rule 211(b)(1).

(5) Length of Briefs. Except in cases in which a sentence of death has been imposed, principal briefs shall not exceed fifty (50) pages, and reply briefs shall not exceed twenty-five (25) pages. On motion, the appellate court may grant a party permission to exceed those limitations.

(6) Joining in Briefs. In cases involving more than one appellant or respondent, including cases consolidated for appeal, any number of parties may join in a single brief, and any party may adopt by reference all or any part of the brief of another.

(7) Supplemental Citations. When pertinent and significant authorities come to the attention of a party after his initial brief(s) has been served and filed, the party shall promptly advise the clerk of the appellate court, by letter, with a copy to all counsel, setting forth the citations. There shall be a reference either to the page of the brief or to an issue to which the citations pertain, but the letter shall, without argument, state the reasons for the supplemental citations. Any response shall be made promptly and shall be similarly limited.

(8) Form. All briefs shall comply with the requirements of Rule 267, except that the cover of initial briefs may be made of white paper of not less than twenty pound weight and the initial briefs shall not be bound but shall be securely stapled or fastened on the top left hand corner.

ist amended by Order dated January 29, 2009, effective April 29, 2009, by Order of the same date.

FROM:

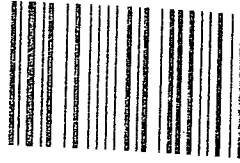
Alice L Roseboro

1852 Bon Road

Rock Hill, SC 29230

PLACE STICKER AT TOP OF
OF THE RETURN ADDRESS

CERTIFIED



7011 0470 0000

TO:

S.C. Court of R

Clerk of Court

1015 Sumter

Columbia SC

FIRST CLASS

Utility Mailer
10 1/2" x 16"

Ready Post

POSTNET

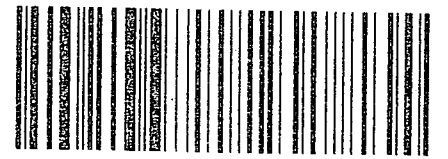
Court of Appeals
Bank of Court Office
15 Sumter St
Columbia SC 29201

SC Court of Appeals

JUL 18 2014

RECEIVED

2012 0470 0003 0694 9232



CERTIFIED MAIL™
PLACE STICKER AT TOP OF ENVELOPE OR THE RIGHT
OF THE RETURN ADDRESS. HOLD AT DOTTED LINE.

U.S. POSTAGE
Paid
FORT MILL, SC
JUL 16 2014
AMOUNT
\$5.54
00041843-05
29201 1000
UNITED STATES
POSTAL SERVICE

CASE HISTORY FOR CASE 2012CP4601328

P.9

11/2013	12:41 PM	Order of Reference
13/2013	12:15 PM	Filing recorded: Notice of Hearing & Certificate of Service
0/2012	11:56 AM	Received payment of \$150 from Rogers Townsend & Thomas, Pc for Wells Fargo Bank NA. Printed receipt #293337.
21/2012	10:59 AM	Received payment of \$25 from Mcangus Goudelock & Courie Llc for Wells Fargo Bank NA. Printed receipt #299413.
5/2013	11:54 AM	Received payment of \$50 from Mcangus Goudelock & Courie Llc for Wells Fargo Bank NA. Printed receipt #304987.
21/2012	12:00 AM	C46KRAWLIN recorded the following Case Note: sent order to Judge Alford
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 MOFREE - 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
2/2013	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 MOFREE - 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
1/2014	12:00 AM	C46LSHILLI recorded the following Case Note: Documents sent to Clerks office certified mail.....no return copies or envelope included

EXHIBIT A update

- No. 1 Envelope showing Rogers and Townsend, Thomas PC were the firsts lawfirm assigned
- No. 2 Shows fax sent to Rogers and Townsend requesting info to bring mortgage current.
- No. 3 Shows they took over 4 months to give me the info, I filed a complaint against them I allege Wells Fargo was not pleased with there performance and change to a new law firm.
- No. 4 Shows New attorney Thomas E Lydon filed Proposed Order to take there place paid fee.
- No. 5 verifies the proposed Consent Order for Substitution of Council by Mr Thomas E Lydon.
- NO. 6 Shows the signing of Consent Order by the attorneys for Substitution of Council.
- NO. 7-8 Shows mail from the lawfirm MG&C sent Aug 14 2013 for Order of Reference and There Summary Judgment filed along with the Affidavit of Amanda Weatherly under oath.
- No. 9 Shows that MG&C Lic for Wells Fargo Bank paid the required fees totaling \$75.00
- No. 10 Shows the Jan 23 2014 envelope from MG&C LawFirm
- No. 11 shows the proposed Order dated Jan 21 2014 for the Judge to signed.

EXCERPTS Pages 1
and Pages 8.6-9
From previous
Petition files sent
on 6/30/14

EXHIBIT A

(P.10F11)

Attorney For Council
Substitution

Alice L. Rosebow

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)

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

IN THE COURT OF COMMON PLEAS

Civil Action No. 2012-CP-46-1328

**CONSENT ORDER FOR
SUBSTITUTION OF COUNSEL**

P.L

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

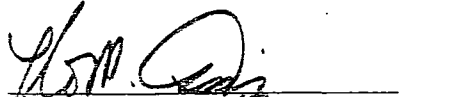
_____, South Carolina
_____, 2012

I SO MOVE:


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

← (NOT "mge" LAW RealEstate)

I CONSENT:


Robert P. Davis (Bar # 74030)
Rogers, Townsend & Thomas, PC
Post Office Box 100200
Columbia, South Carolina 29202
Phone: 803-744-4444

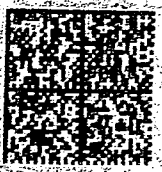
P.2



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

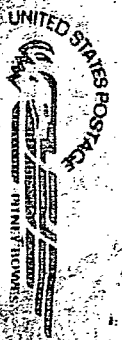
TO:

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



02:1A
0004635284
AUG 14 2013
MAILED FROM ZIP CODE 29201

\$ 01:520



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