

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

P. 1 OF 10

APPEAL FROM YORK COUNTY  
COURT OF COMMON PLEAS

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

RECEIVED

JUL 31 2014

SC Court of Appeals  
Respondent

Wells Fargo Bank NA

v

Appellant

Alice L. Roseboro

June 19 / June 20 Fraud Dismissal

ORDER OF CONSENT by The

Judge Lee Alford Dec 28 2012

PURSUANT TO RULE 11(b)

Alice L. Roseboro  
1852 BON ROAD  
ROCK HILL, SC 29730  
803-524-1122

Alice L. Roseboro

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

R20F10

APPEAL FROM YORK COUNTY  
COURT OF COMMON PLEAS

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

Wells Fargo Bank

Respondent

v.

Alice L. Roseboro

Appellant

June 19/June 20 "FRAUD DISMISSAL"

"I appellant previously made known to the  
court, that the Respondents Never Answered  
by Appeal by U.S. Mail on any Documents  
to my home, since I filed my Appeal on  
Feb 21, 2014. They made NO. Opposition!  
to my Appeal, Initial Brief, or Transcript  
since I filed them, AS I stated "under my

P.30F10

sworn oath taken May 20, 2014 and  
sent to the court by U.S. mail Fed X for  
delivery by May 23, 2014. I also filed with  
the court the Consent Order for a  
Substitution of Counsel from Dec 13, 2012  
that the attorney Thomas E. Lydon sent  
me. The attorney and court failed to send  
me my copy of the Consent Order once it  
was approved by the court judge. I  
recently went to the lower court to get my  
copy, I had to pay for it, This copy should have  
been given to me free by the attorney but was  
never sent. I am hereby sending you the  
signed copy by the "court Judge Alford"  
Dec 28, 2012 granting the permission for  
"Thomas E. Lydon and Lawfirm Mc Angus,

Gouderlock & Couriel LLC aka <sup>p. 4 of 10</sup> "MG&C LLC"

to substitute for Rogers, Townsend & Thomas, PC

and Robert P. Davis on counsel Pursuant

to Rule 11(b) of the SCRSP this substitution

was approved and "SO ORDERED" by the

Judge Lee Alford for consent on Dec 28, 2012.

Never was approval given on consent form

by Judge Lee Alford Dec 28th 2012 to allow the

"mgc Real Estate Firm" to be a party to counsel

Ever. As I stated before MG&C LLC and Thomas

E. Lydon Never Answered my Appeals As I stated

before mgc and Attorney Thomas E. Lydon are

NOT a party to counsel for the Respondents and

does not have the legal authority to Dismiss

my Appeals case Ever Pursuant to Rule 214(A)  
Rule 11(b).

R.50F10

of the South Carolina Rules of Civil Procedures.

as verified by the signature of the Court

Judge Lee Alford, on this Dec 28, 2012

signing for a Substitution of counsel.

Pursuant to Rule "208A(4)" upon failure to

Respond by the Respondent, the Appellate Court

has the authority to take Action. As I

stated before in my June 30, 2014 reply

the Dismissals should be reversed for a NO

Opposition by the Respondents MEGILL and

Attorney Thomas E. Lydon the "true parties" on

counsel for the Respondents legally approved by

the court. See Enclosed Exhibit A Noted Facts.

I petition the Court for Relief pursuant to Rule <sup>208A(4)</sup>

P. 6 OF 10

\* Attached Decisions Needs to be Reversed

by the Court Judges pursuant to Rule 11(b)

AND Rule 208 A(4) The Controlling Laws

Are Clear. Relief needs to be Granted, ON

Petition For Review, And ANY Additional  
Relief, the court deems proper Above + beyond.

\* The Controlling laws are clear, Decision should be short. \*  
Decision NOT Dismissal from June 18, 2014 AND  
Decision NOT Reversal of Judgment entered

Feb 10, 2014 do to NO Opposition ON Appeals

\* See Exhibit A + B + C

Sincere Respect

MB&C LLC  
Thomas E. Lydon  
1320 Main St 18th Fl  
Columbia, SC 29201  
Attorney For Respondent  
803-227-2292

Alice L Roseboro  
1852 BSA Res Dr  
Rock Hill, SC 29730  
803-524-1122  
Attorney for Appellant

Alice Roseboro

# The South Carolina Court of Appeals

P. 70F10

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

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## ORDER

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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

P.80F10

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), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  
 Rule 43(k), SCRPC (Settled);  Other: \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):  Rule 40(j) SCRPC;  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.

*of Charles S. Bradford*

2098

2/10/2014

Special Referee

Judge Code

Date

For Clerk of Court Office Use Only

P90P10

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

PROOF

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**

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.

July 30, 2014

MG&C LLC  
Thomas E Lydon  
1320 Main St 10 fl  
Columbia SC 29201  
Attorney for Council  
803-227-2292

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

*Alice L. Roseboro*

EXHIBIT-A      PART 1

PAGE 1-6

Consent Order and Party  
To Counsel

Signed by Judge Lee Alford



ATTORNEYS AT LAW

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

Recv P-2  
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, )

Civil Action No 2012-CP-46-1328

vs. )

**CONSENT ORDER FOR**  
**SUBSTITUTION OF COUNSEL**

PS

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 #74030)  
Rogers, Townsend & Thomas, PC  
Post Office Box 100200  
Columbia, South Carolina 29202  
Phone: 803-744-4444

STATE OF SOUTH CAROLINA )

COUNTY OF YORK )

Wells Fargo Bank, NA, )  
 Plaintiff )

Alice Roseboro, Et Al, )  
 Defendant. )

Excerpt No 1

IN THE COURT OF COMMON PLEAS

CASE NO P-4  
2012-CP-46-1328

MOTION AND ORDER INFORMATION  
FORM AND COVER SHEET

FILED-RECEIVED  
2013 JAN -2 AM 9:47  
DAVID HAMILTON  
CLERK OF COURT  
YORK COUNTY, S.C.

Plaintiff's Attorney  
Thomas E Lydon, Bar No 10242  
Address.  
Post Office Box 12519, Columbia, SC 29211  
phone 803-779-2300 fax.  
e-mail other.

Defendant's Attorney.  
Alice Roseboro, Bar No  
Address  
1852 Bon Rea Drive, Rock Hill, SC 29730  
phone. fax:  
e-mail other

- MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
- FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
- PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

**SECTION I: Hearing Information**

Nature of Motion. Consent Order for Substitution of Counsel  
Estimated Time Needed: Court Reporter Needed  YES /  NO

**SECTION II: Motion/Order Type**

- Written motion attached
  - Form Motion/Order
- I hereby move for relief or action by the court as set forth in the attached proposed order

Thomas E Lydon  
Signature of Attorney for  Plaintiff /  Defendant  
December 13, 2012  
Date submitted

**SECTION III: Motion Fee**

- PAID - AMOUNT 25 00
- EXEMPT
  - Rule to Show Cause in Child or Spousal Support
  - Domestic Abuse or Abuse and Neglect
  - Indigent Status  State Agency v. Indigent Party
  - Sexually Violent Predator Act  Post-Conviction Relief
  - Motion for Stay in Bankruptcy
  - Motion for Publication  Motion for Execution (Rule 69, SCRPC)
  - Proposed order submitted at request of the court; or,  
reduced to writing from motion made in open court per judge's instructions
- Name of Court Reporter
- Other

**JUDGE'S SECTION**

- Motion Fee to be paid upon filing of the attached order
- Other.

JUDGE \_\_\_\_\_  
CODE \_\_\_\_\_ Date \_\_\_\_\_

**CLERK'S VERIFICATION**

Collected by K. Rawlison Date Filed \_\_\_\_\_

- MOTION FEE COLLECTED \$25.00 1/7/13
- CONTESTED - AMOUNT DUE \_\_\_\_\_

EXHIBIT No. 2

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF YORK )

IN THE COURT OF COMMON PLEAS

PS

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

Civil Action No. 2012-CP-46-1328

vs. )

**CONSENT ORDER FOR  
SUBSTITUTION OF COUNSEL**

DAVID HAMILTON  
C.C. P. & S.  
YORK COUNTY, SC

2013 JAN -2 AM 9:47

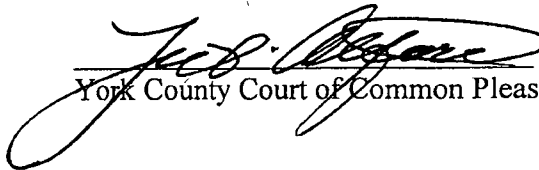
FILED-RECEIVED

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 )

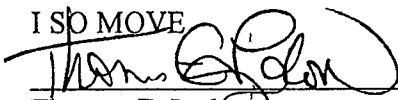
Upon motion of Thomas E. Lydon, with the consent of Robert P. Davis, and in accordance with Rule 11(b) of the South Carolina Rules of Civil Procedure,

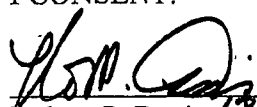
It is ORDERED that Thomas E Lydon is hereby substituted for Robert P. Davis as counsel for Plaintiff Wells Fargo Bank, N.A. in this matter.

AND IT IS SO ORDERED.

 Presiding Judge  
York County Court of Common Pleas

York, South Carolina  
December 28, 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

CASE HISTORY FOR CASE 2012CP4601328

Wells Fargo Bank NA

Age Unknown  
DL#

P. 6

DOB Unknown  
SSN 000-00-0000

COST	ORIGINAL	BALANCE DUE	DISBURSED	PAY PRIORITY
Action Summons & Complaint				
Civil Filing Fee County 44%/100%	\$44 00	\$0 00	\$44 00	999
Civil Filing Fee State 56%	56 00	0 00	56 00	999
SCJD Filing Fee Proviso \$50 / \$25	50 00	0 00	50 00	999
Action Motion Fee For Consent Order to Substitute Counsel				
Motion/Order Filing Fee \$25	25 00	0 00	25 00	999
Action Motion & Motion Fee For Order of Reference & Cert of Ser				
Motion/Order Filing Fee \$25	25 00	0 00	25 00	999
Action Motion & Motion Fee For Summary Judgment/Cert of Service				
Motion/Order Filing Fee \$25	25 00	0 00	25 00	999
<b>Total</b>	<b>\$225 00</b>	<b>\$0 00</b>	<b>\$225 00</b>	

DATE	TIME	EVENT DESCRIPTION
1/23/2013	4 10 PM	Order (Def's Motion to Compel & Summ Judg & Pltfs SJ Motion)
1/10/2014	1:00 PM	Filing recorded Notice of Hearing
1/10/2014	1 00 PM	Order ( Denying Defendants Motions)
1/10/2012	11 48 AM	Filing recorded 1852 Bon Rea Dr Rock Hill SC 29730 / Property Description
1/10/2012	11:48 AM	Filing recorded Lis Pendens Filed
1/10/2012	11.48 AM	Filing recorded Summons & Complaint
1/10/2012	11 48 AM	Filing recorded Notice of Foreclosure Intervention
1/12/2012	11 29 AM	Filing recorded Affidavit Of Service - Citibank South Dakota NA
1/12/2012	11.28 AM	Filing recorded Affidavit Of Service - Alice Roseboro
1/17/2012	9 38 AM	Filing recorded Affidavit Of Service- LVNV Funding LLC
1/17/2012	8 58 AM	Filing recorded Affidavit Of Service- Founders Federal Credit Union
1/13/2012	11.12 AM	Filing recorded Affidavit Of Service- SC Dept of Revenue
1/6/2012	11 56 AM	Filing recorded Attorney Certification & Certificate Of Mailing
1/8/2012	11 29 AM	Filing recorded Reply To Counterclaim & Certificate Of Service
1/14/2012	11:58 AM	Filing recorded Letter Re Consent Order for Substitution of Counsel
2/21/2012	10 56 AM	Motion Fee For Consent Order to Substitute Counsel
2/2/2013	9.47 AM	Consent Order For Substitution of Counsel
1/15/2013	11 47 AM	Motion & Motion Fee For Order of Reference & Cert of Ser
1/15/2013	11 47 AM	Motion & Motion Fee For Summary Judgment/Cert of Service
1/15/2013	11 47 AM	Filing recorded Affidavit of Amanda Weatherly

Print Date 03/14/2014  
Print Time 10 58 08AM  
Requested By C46LSHILLI

# EXHIBIT-A PART 2

PAGES 7-11

Feb 10, 2014 Proposed ORDER  
Filing

\* Signed on JAN 23, 2014 same day

I received it in the mail

Judge Bradford signed before I  
could make my Objection AND

Comment rules b(3) violation

\* Conflict of Interest Discovered

Judge does closings for Respondent

Wells Fargo Bank per Info from  
employee DIANE who worked at  
front Desk

\* Office Brochure enclosed

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF YORK )

P-8  
IN THE COURT OF COMMON PLEAS

Wells Fargo Bank, N.A., )

Civil Action No. 2012-CP-46-1328

Plaintiff, )

**ORDER**

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. )

FILED-RECEIVED  
2014 FEB 10 8 1:00  
JUDICIAL BRANCH  
C.C.P. & G.S.  
YORK COUNTY, S.C.

This matter came before the Court on January 10, 2014, for a hearing on all of Defendant Alice Roseboro's pending motions. Present at the hearing was Thomas E. Lydon, on behalf of Plaintiff. Ms. Roseboro was given notice of the hearing, but did not attend.

Having reviewed the motions and the supporting documentation filed by Defendant Alice Roseboro, I find and conclude as follows:

1. The notice of the hearing served by counsel for Plaintiff was proper. The date and time of the hearing was set with the knowledge and approval of the Special Referee, so any objections Ms. Roseboro has regarding the manner in which the hearing was noticed are overruled.

2. Several of the motions filed by Ms. Roseboro appear to be dispositive in nature. However, the dispositive motions are not supported by affidavits. Therefore, they must be denied.

3. Several of Ms. Roseboro's motions request that a default judgment be entered against Plaintiff. However, Plaintiff timely filed a Reply to the counterclaims alleged against it, so the application for default judgment is denied.

4. Ms. Roseboro has filed a motion to strike and a motion to compel with regard to Plaintiff's responses to her interrogatories. Plaintiff has agreed to supplement its responses to interrogatories by January 20, 2014. Therefore, this motion is moot

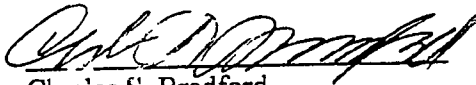
5. Ms. Roseboro has filed several motions for hindrance in which she asks that Plaintiff and its attorneys be sanctioned and held in contempt of court. Having reviewed the pleadings, motions, and supporting documents filed in this matter, I find nothing in the record to support sanctions or the holding of any party in contempt of court. Accordingly, these motions are denied.

6. Regarding the motion to compel review of transcript, Ms. Roseboro has the right to obtain a transcript, at her expense, from any hearing in this matter.

7. Regarding the motion to amend or for more definite statement, based on my review of the motion, it is unclear what the basis for the motion is or what relief is being sought. Therefore, the motion is denied.

8. Ms. Roseboro has also filed a motion to strike order of reference. Having reviewed the Order of Reference, I find that it complies with all of the applicable rules of civil procedure, and no appeal has been taken from the Order. Accordingly, this motion is denied

AND IT IS SO ORDERED.



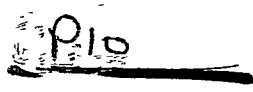
Charles S. Bradford  
Special Referee

York, South Carolina

January 23, 2014



Tuesday, April 01, 2014



80

# Charles S. Bradford

ATTORNEY AT LAW

[Home](#)   [About Us](#)   [Practice Areas](#)   [Useful Articles](#)   [Contact Us](#)

Residential Real Estate

Commercial Real Estate

Estate Planning & Administration

Formation of Corporations & LLCs

Foreclosures & Mechanics Liens

Quiet Title & Partition Cases

## Residential Real Estate

The firm handles residential real estate transactions from the beginning to the conclusion of such matters. We do title work, title insurance, purchase refinances and seller-financed transactions on real property located in Chester and Cherokee Counties in South Carolina. We have extensive working relationships with most all of the major real estate agents, banks and mortgage lenders doing business in this area.

We pride ourselves on providing prompt, efficient and personal service. In any "financing" transaction, we can assist you in drafting the contract, note needed.

Call us today

Charles S. Bradford, P.A.

P.O. Box 977  
4 East Liberty Street  
York, SC 29745

Phone 803 684 4888  
Fax 803 684 4488

## CORPORATIONS & LLCs

If you have your own business or are considering forming your own business, we recommend that you consider incorporating that business. In South Carolina this process can be fairly simple. If you are a business with other people, it is important to have an agreement about how that business will be run, and what happens if one person leaves the business. We can assist you in selecting the right entity for your situation as well as assist you in filing the documents with the Secretary of State's office and drawing up an operating agreement and a buy-sell agreement to make sure your business runs smoothly.

## REAL ESTATE

### REAL ESTATE CLOSINGS

Charles S. Bradford, P.A. can assist you in closing your real estate transaction, whether it is a purchase or a refinance. We can use our experience to insure that you have "good title" to the property you are buying as well as assist you through the entire closing process. In South Carolina an attorney must close your real estate transaction. By choosing our firm to represent you, you will have a firm with the knowledge, experience, and personal attention to your transaction.

### REAL ESTATE LITIGATION

Sometimes property to real estate is in the names of multiple owners who do not agree on the use of the property. Having our firm assist you can resolve disputes in ownership, or disputes about partition, or inaction with regard to a piece of property. This may be a partition action (dividing property among multiple owners), quiet title (confirming owners of property), or ouster (one owner of the property being excluded by another). Additionally there is the potential for an adverse possession claim (squatter's rights).

Proudly serving York, Chester,  
Cherokee, Lancaster and surrounding  
counties for over 30 years.

P.11



[www.charlesbradfordlaw.com](http://www.charlesbradfordlaw.com)

[cbradford@charlesbradfordlaw.com](mailto:cbradford@charlesbradfordlaw.com)

[dharshaw@charlesbradfordlaw.com](mailto:dharshaw@charlesbradfordlaw.com)

CHARLES S. BRADFORD

- PROFESSIONAL ASSOCIATION -

CHARLES S. BRADFORD, ESQ.

DANIEL H. HARSHAW, ESQ.

ATTORNEYS - AT LAW

4 EAST LIBERTY STREET  
POST OFFICE BOX 977  
YORK, SC 29745

TELEPHONE (803) 684-4888

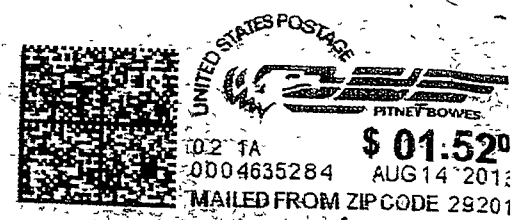
FACSIMILE (803) 684-4488

# EXHIBIT-A PART 3

\* ONLY Lawfirm Page 1 + 2  
\* PARTY TO COUNSEL M&C LLC  
AND ATTORNEY  
THOMAS E. LYDON

PAGES 3 + 4  
\* NOT A PARTY TO COUNSEL "M&C"  
LAWFIRM OR REAL ESTATE GROUP

\* NOT APPROVED BY JUDGE ALFORD ON  
SIGNING DEC 28, 2014



P2

Added note  
07-11-2014  
Rule 11  
\* ONLY \*  
Party signed  
to Council  
by Attorney  
MG&C LLC

**MG&C**  
McAngus Goudelock & Courie, LLC  
ATTORNEYS AT LAW

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

TO

→ ~~20741.12044/TEL/rsr~~  
Alice Rosboro  
1852 Box Rea Drive  
Rock Hill South Carolina 29730

June 17, 2014

P-3

sent → 06/17/2014  
received 06/19/20

Atty:  
**THOMAS E LYDON**

**mgc**

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

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

\*Added  
07-11-2014  
UPDATE Note  
Rule  
116 "mge" IS  
NOT A PARTY  
To Council for  
Respondents

DEFINITIVE  
STATION  
SENDER

UPDATE Note  
→ July 11, 2014  
see exhibit -  
\*A ALSO

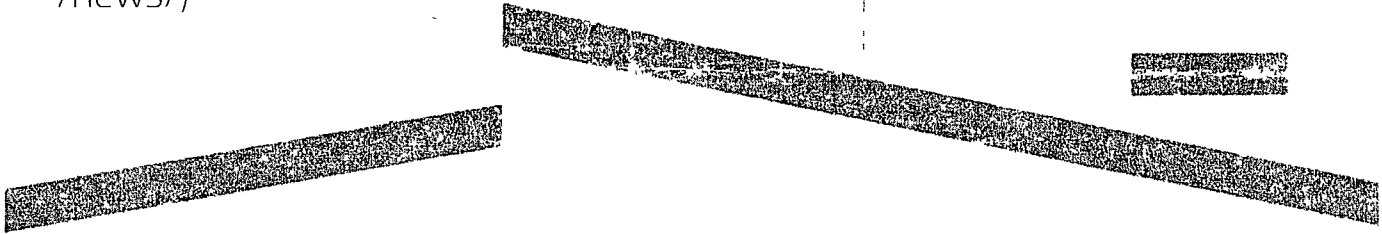
P.4

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

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 Carolina (<http://mgcrealestate.com>)

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

# EXHIBIT-B Pages 1-6

## Rules of The Court

(~~Rule~~  
~~11(b)~~) Change of Attorney

(Rule  
264(c)) Continued Representation

(Rule  
5(b)(3)) Right to comment before  
Proposed Orders are signed

(Rule  
208 A(4)) Failure to file reply by respondent  
208(2)

amendment does not change the standard for imposing sanctions which remains that of the pre-1983 Federal Rule

**Note to 1993 Amendment:**

P.2

Rule 11(a) was amended to add a requirement that the signer of pleadings include his telephone number

~~(b) Change of Attorney.~~ An attorney may be changed by consent, or upon cause shown, and upon such terms as shall be just, upon application, by order of the Court, and not otherwise. Written notice of change of attorney must be served as provided by Rule 5

**Note:**

This Rule 11(b) retains the requirements of Circuit Court Rule 7, and represents no change in State or Federal practice

**(c) Affidavits and Verifications.** Affidavits or verifications authorized or permitted under these Rules shall be written statements or declarations by a party or his attorney of record or of a witness, sworn to or affirmed before an officer authorized to administer oaths, that the affiant knows the facts stated to be true of his own knowledge, except as to those matters stated on information and belief and as to those matters that he believes them to be true. When a corporation is a party the verifications may be made by any officer or agent thereof. When a partnership or other unincorporated association is the party under a common name the verification may be made by a member or officer thereof. When the State or any officer thereof in its behalf is a party, verifications may be made by any person acquainted with the facts

**(d) Attorney as Surety.** No attorney or other officer of the court shall become surety upon any undertaking or bond filed in any action

**Note:**

Rules 11(c) and 11(d) are added to the Federal Rule to preserve the requirements of Code § 15-1-240, and Circuit Court Rule 9

**Note to 1986 Amendment:**

Rule 11(c) is amended to permit an employee of an attorney to probate affidavits or verifications ~~on-pleadings-or-other-papers, although a deposition cannot be taken before such employee under~~ Rule 28(c)

Amended by Order dated April 15, 2014

**RULE 264****SUBSTITUTION OF ATTORNEYS OR GUARDIANS**p.3

**(a) Continued Representation.** The attorneys and/or guardians *ad litem* of the respective parties in the court below shall be deemed the attorneys and guardians of the same parties in the appellate court until withdrawal is approved and notice is given as provided in this Rule

**(b) Withdrawal.** An attorney of record in a matter pending before an appellate court may not withdraw from representation of his client without justifiable cause, or the consent of his client, and then only after proper written notice to his client, on petition to and by written order of the appellate court, and with notice to the adverse party

Amended by Order dated January 29, 2009, effective April 29, 2009, by Order of the same date

This Rule 5(b)(1) is the same as Federal Rule 5(b) and substantially restates Code §§ 15-9-920, 15-9-930, 15-9-980 and 15-9-990, with no resulting change in State practice Rule 5(b)(2) is the same as Code § 15-9-1010, except permitting subpoenas to be served on Sunday

**Note to 2001 Amendment:**

Rule 5(b)(2) is rewritten to reflect the enactment of S C Code Ann § 15-9-17, 2000 S C Acts No 360, which allows for the service of process on Sundays with the stated exceptions

**(b)(3) Service of Proposed Orders and Other Papers.** Any party providing a proposed order, proposed findings of fact or conclusions of law, or proposed judgment or other paper to the court for its consideration in any pending matter shall serve the same on all counsel of record at the same time and by the same means

**Note to 1994 Amendment:**

Rule 5(b)(3) clarifies the intent of Rule 5(a) and requires that proposed orders, findings of fact and conclusions of law and other materials provided to the court are to be served on all counsel of record The material is to be provided to all other counsel at the same time and by the same means as they are provided to the court Thus opposing counsel will have the opportunity to review and comment on the proposed order before it is signed The rule does not require the court to delay entering any proposed order ↑

**(c) Same: Numerous Defendants.** In any action in which there are unusually large numbers of defendants, the court, upon motion or of its own initiative, may order that service of the pleadings of the defendants and replies thereto need not be made as between the defendants and that any cross-claim, counterclaim, or matter constituting an avoidance or affirmative defense contained therein shall be deemed to be denied or avoided by all other parties and that the filing of any such pleadings and service thereof upon the plaintiff constitutes due notice of it to the parties A copy of every such order shall be served upon the parties in such manner and form as the court directs

**Note:**

This Rule 5(c) is the same as the Federal Rule It has no parallel in State practice, but is a needed addition

**(d) Filing.** All papers required to be served upon a party except as provided in Rule 26(g)(1), shall be filed with the court within five (5) days after service thereof The summons and complaint shall be filed before service Proof of service shall be filed within ten (10) days after service of the summons and complaint Upon failure to serve the summons and complaint, the action may be dismissed by the court on the court's own initiative or upon application of any party Upon failure of a party to file other pleadings, motions, or papers, the court may permit filing or proceed as though the same had not been served

**Note:**

**RULE 208**  
**INITIAL BRIEFS**

PS

**Time for Serving and Filing Initial Briefs.**

(1) **Brief of Appellant.** Within thirty (30) days after receiving the transcript <sup>↓</sup> or, if no transcript is ordered, within thirty (30) days after serving the notice of appeal, <sup>↓</sup> 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 <sup>↓</sup> <sup>↓</sup> <sup>↓</sup> <sup>↓</sup>

(2) **Brief of Respondent.** Within thirty (30) days after service of appellant's brief, <sup>↓</sup> <sup>↓</sup> <sup>↓</sup> <sup>↓</sup> <sup>↓</sup> <sup>↓</sup> 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.

**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.

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. 6

(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

FRAUD FORECLOSER

with P-1-20

WRONG BANK

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

P.2

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF YORK )

IN THE COURT OF COMMON PLEAS

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

Civil Action No 2012-CP-46-1328

vs )

**MOTION FOR ORDER OF REFERENCE**

Alice L Roseboro, )  
 )  
Defendant. )

**TO: DEFENDANT ALICE L. ROSEBORO**

You will please take notice that on the tenth (10<sup>th</sup>) day after service hereof, or as soon thereafter as may be scheduled, the undersigned attorney for Plaintiff will move before the presiding judge of the York County Court of Common Pleas for an Order referring the above-captioned matter to the Honorable S. Jackson Kimball, York County Master-in-Equity, with finality The basis for this motion is that this action was filed as a mortgage foreclosure action, which is an equitable, non-jury proceeding Furthermore, there has been no demand for jury trial

This motion is based upon the pleadings in this case, Rules 53 and 71 of the South Carolina Rules of Civil Procedure, applicable South Carolina law, and such other materials as may be presented to the Court.

McANGUS, GOUDELOCK & COURIE, LLC

By: 

Thomas E. Lydon  
1320 Main Street, 10<sup>th</sup> Floor  
Post Office Box 12519  
Columbia, South Carolina 29211  
803-779-2300

August 14, 2013

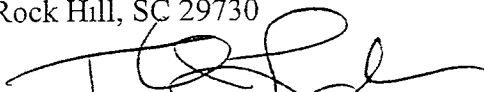
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

P. 3

I hereby certify that I have this 14<sup>th</sup> day of August, 2013, served a copy of Plaintiff's Motion for Order of Reference, by mailing a copy of same, postage prepaid, in the United States mail, with sufficient postage affixed as follows

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



---

Thomas E Lydon

P. 4

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF YORK )  
 )  
 Wells Fargo Bank, N A , )  
 )  
 )  
 Plaintiff, )  
 )  
 vs )  
 )  
 Alice L Roseboro, )  
 )  
 )  
 Defendant )

IN THE COURT OF COMMON PLEAS

Civil Action No 2012-CP-46-1328

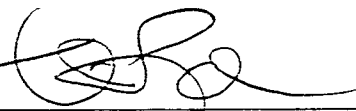
**MOTION FOR SUMMARY JUDGMENT**

**TO: DEFENDANT ALICE L. ROSEBORO**

You will please take notice that <sup>↓</sup>on the tenth (10<sup>th</sup>) day after service hereof, or as soon thereafter as may be scheduled, the undersigned will move before the presiding judge of the York County Court of Common Pleas, for an Order granting summary judgment on the Plaintiff's Complaint and dismissing the counterclaims asserted by Defendant. The basis for this motion is that there is no genuine issue as to any material fact in the case, and Plaintiff is entitled to judgment as a matter of law

This motion will be based upon Rule 56 of the South Carolina Rules of Civil Procedure, applicable statutory and case law, the pleadings in this matter, the Affidavit of Amanda Weatherly, and such other affidavits and materials as may be presented to the Court.

McANGUS, GOUDELOCK & COURIE, LLC

By.   
 \_\_\_\_\_  
 Thomas E Lydon  
 1320 Main Street, 10<sup>th</sup> Floor  
 Post Office Box 12519  
 Columbia, South Carolina 29211  
 803-779-2300

August 14, 2013

Attorneys for Plaintiff

P. 5

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 14<sup>th</sup> day of August, 2013, served copies of Plaintiff's Motion for Summary Judgment and the Affidavit of Amanda Weatherly, by mailing copies of same, postage prepaid, in the United States mail, with sufficient postage affixed as follows:

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

A handwritten signature in black ink, appearing to read 'T. Lydon', written over a horizontal line.

Thomas E. Lydon

P. 6.

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF YORK )

IN THE COURT OF COMMON PLEAS

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

Civil Action No. 2012-CP-46-1328

**AFFIDAVIT OF AMANDA WEATHERLY**

vs. )  
 )  
Alice L. Roseboro, et al. )  
 )  
Defendant. )

Personally appeared before me Amanda Weatherly who, being duly sworn, deposes and says that:

1. I am a Vice President Loan Documentation for Plaintiff.
2. In my capacity as a Vice President Loan Documentation for Plaintiff, I am

familiar with the loan that is the subject of the above-captioned action, and I have access to the records concerning the transaction and the related litigation. This affidavit is based on personal knowledge and information obtained from Plaintiff's records.

3. The mortgage loan that is the subject of this foreclosure action is evidenced by a promissory note and mortgage dated January 5, 2000, in the original principal amount of \$99,900.00.

4. Copies of the promissory note and mortgage are attached as Exhibits A and B to this affidavit.

5. The last funds received on this loan were in the amount of \$234.84 on March 7, 2011. No payments have been received since that date.

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# EXHIBIT A

8784872  
ROSEBORO

P. 8

FUMC Loan No. 8784872

**NOTE**

January 6 2000 ROCK HILL SOUTH CAROLINA  
(Date) (City) (State)

1852 BON BEA DRIVE ROCK HILL, SC 29730  
(Property Address)

**1 BORROWER'S PROMISE TO PAY**

In return for a loan that I have received, I promise to pay U S \$ 99,900 00 (this amount is called "principal"), plus interest, to the order of the Lender. The Lender is FIRST UNION MORTGAGE CORPORATION. I understand that the Lender may transfer this Note. The Lender or anyone who takes this Note by transfer and who is entitled to receive payments under this Note is called the "Note Holder."

**2. INTEREST**

Interest will be charged on unpaid principal until the full amount of principal has been paid. I will pay interest at a yearly rate of 7.750 %.

The interest rate required by this Section 2 is the rate I will pay both before and after any default described in Section 6(B) of this Note.

**3. PAYMENTS**

**(A) Time and Place of Payments**

I will pay principal and interest by making payments every month.

I will make my monthly payments on the 1st day of each month beginning on February 1 2000. I will make these payments every month until I have paid all of the principal and interest and any other charges described below that I may owe under this Note. My monthly payments will be applied to interest before principal. If, on January 1 2030, I still owe amounts under this Note, I will pay those amounts in full on that date, which is called the "maturity date."

I will make my monthly payments at 1100 CORPORATE CENTER DRIVE  
RALEIGH, NC 27607-5066 or at a different place if required by the Note Holder.

**(B) Amount of Monthly Payments**

My monthly payment will be in the amount of U S \$ 715 70.

**4. BORROWER'S RIGHT TO PREPAY**

I have the right to make payments of principal at any time before they are due. A payment of principal only is known as a "prepayment." When I make a prepayment, I will tell the Note Holder in writing that I am doing so.

I may make a full prepayment or partial prepayments without paying any prepayment charge. The Note Holder will use all of my prepayments to reduce the amount of principal that I owe under this Note. If I make a partial prepayment, there will be no changes in the due date or in the amount of my monthly payment unless the Note Holder agrees in writing to those changes.

**5. LOAN CHARGES**

If a law, which applies to this loan and which sets maximum loan charges, is finally interpreted so that the interest or other loan charges collected or to be collected in connection with this loan exceed the permitted limits, then: (i) any such loan charge shall be reduced by the amount necessary to reduce the charge to the permitted limit, and (ii) any sums already collected from me which exceeded permitted limits will be refunded to me. The Note Holder may choose to make this refund by reducing the principal I owe under this Note or by making a direct payment to me. If a refund reduces principal, the reduction will be treated as a partial prepayment.

**6. BORROWER'S FAILURE TO PAY AS REQUIRED**

**(A) Late Charge for Overdue Payments**

If the Note Holder has not received the full amount of any monthly payment by the end of 15 calendar days after the date it is due, I will pay a late charge to the Note Holder. The amount of the charge will be 5.000 % of my overdue payment of principal and interest.

I will pay this late charge promptly but only once on each late payment.

**(B) Default**

If I do not pay the full amount of each monthly payment on the date it is due, I will be in default.

**(C) Notice of Default**

If I am in default, the Note Holder may send me a written notice telling me that if I do not pay the overdue amount by a certain date, the Note Holder may require me to pay immediately the full amount of principal which has not been paid and all the interest that I owe on that amount. That date must be at least 30 days after the date on which the notice is delivered or mailed to me.

**(D) No Waiver By Note Holder**

Even if, at a time when I am in default, the Note Holder does not require me to pay immediately in full as described above, the Note Holder will still have the right to do so if I am in default at a later time.

**(E) Payment of Note Holder's Costs and Expenses**

If the Note Holder has required me to pay immediately in full as described above, the Note Holder will have the right to be paid back by me for all of its costs and expenses in enforcing this Note to the extent not prohibited by applicable law. Those expenses include, for example, reasonable attorney's fees.

(F) The Note Holder may collect a processing fee for any check received by Note Holder which is dishonored and returned as provided by state law or charged by national banks from time to time.

**7 GIVING OF NOTICES**

Unless applicable law requires a different method, any notice that must be given to me under this Note will be given by delivering it or by mailing it by first class mail to me at the Property Address above or at a different address if I give the Note Holder a notice of my different address.

Any notice that must be given to the Note Holder under this Note will be given by mailing it by first class mail to the Note Holder at the address stated in Section 3(A) above or at a different address if I am given a notice of that different address.

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# **EXHIBIT B**

8784872  
ROSEBORO

P. 10

When Recorded Mail To  
FIRST UNION MORTGAGE CORPORATION  
1100 CORPORATE CENTER DR/NC4777  
RALEIGH, NC 27607-5066

[Space Above This Line For Recording Data]

**MORTGAGE** FUMC # 8784872  
THIS MORTGAGE ("Security Instrument") is given on January XX 5, 2000 The mortgagor is  
ALICE ROSEBORO a/k/a Alice L. Roseboro

\_\_\_\_ ("Borrower") This Security Instrument is given to  
FIRST UNION MORTGAGE CORPORATION, which is organized and existing  
under the laws of NORTH CAROLINA, and whose address is  
1100 CORPORATE CENTER DRIVE RALEIGH, NC 27607-5066 ("Lender")  
Borrower owes Lender the Principal sum of Ninety Nine Thousand Nine Hundred and no/100  
Dollars (U.S \$ 99,900 00 ) This debt is evidenced by Borrower's note  
dated the same date as this Security Instrument ("Note"), which provides for monthly payments, with the full debt, if not  
paid earlier, due and payable on January 1 2030 This Security Instrument  
secures to Lender (a) the repayment of the debt evidenced by the Note, with interest, and all renewals, extensions and  
modifications of the Note, (b) the payment of all other sums, with interest, advanced under paragraph 7 to protect the  
security of this Security Instrument, and (c) the performance of Borrower's covenants and agreements under this Security  
Instrument and the Note. For this purpose, Borrower does hereby mortgage, grant and convey to Lender and Lender's  
successors and assigns the following described property located in YORK  
County, South Carolina

See Attached Exhibit A Incorporated Herein.

which has the address of 1852 BON REA DRIVE ROCK HILL  
[Street] [City]  
South Carolina 29730 ("Property Address")  
[Zip Code]

TO HAVE AND TO HOLD this property unto Lender and Lender's successors and assigns, forever, together  
with all the improvements now or hereafter erected on the property, and all easements, appurtenances, and fixtures now  
or hereafter a part of the property All replacements and additions shall also be covered by this Security Instrument  
All of the foregoing is referred to in this Security Instrument as the "Property "

BORROWER COVENANTS that Borrower is lawfully seized of the estate hereby conveyed and has the right to  
mortgage, grant and convey the Property and that the Property is unencumbered, except for encumbrances of record  
Borrower warrants and will defend generally the title to the Property against all claims and demands, subject to any  
encumbrances of record.

THIS SECURITY INSTRUMENT combines uniform covenants for national use and non-uniform covenants  
with limited variations by jurisdiction to constitute a uniform security instrument covering real property



P.12

FORM 4

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

JUDGMENT IN A CIVIL CASE

CASE NO. 2012-CP-4601328

WELLS FARGO BANK

ALICE ROSEBORO, ET AL

PLAINTIFF(S)

DEFENDANT(S)

Submitted by: S. J Kimball

Attorney for :  Plaintiff  Defendant  
or  
 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
- ACTION DISMISSED (CHECK REASON)**  Rule 12(b), SCRPC,  Rule 41(a), SCRPC (Vol Nonsuit),  Rule 43(k), SCRPC (Settled),  Other \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON)**  Rule 40(j), SCRPC,  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

This matter came before me on March 14, 2013, upon Defendant Alice Roseboro's Motion to Amend Answer Representing the parties were Thomas E Lydon for Plaintiff, and, Alice Roseboro appearing *pro se*

After discussion of the motion and status of the case with Ms Roseboro and Plaintiff's counsel, Ms

Roseboro elected to withdraw her motion. Therefore, it is ordered that the Motion be withdrawn, and the case shall proceed in the normal course of litigation, with Plaintiff to set a hearing on the merits at the earliest practicable date

AND IT IS SO ORDERED

ORDER INFORMATION

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)
		\$
		\$
		\$

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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.

M. Kimball 3063 3-15-13  
Master-In-Equity Judge Code Date

For Clerk of Court Office Use Only

This judgment was entered on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ and a copy mailed first class or placed in the appropriate attorney's box on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ to attorneys of record or to parties (when appearing pro se) as follows

Thomas E. Lydon

Alice L. Roseboro, pro se

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

CLERK OF COURT

Court Reporter: Aminah Hardy

h2

copy

P. 14

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

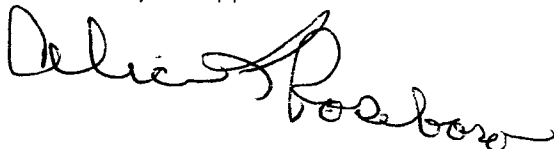
Appellant

AGREEMENT TO SUBMIT LESS THAT THE ENTIRE TRANSCRIPT

I appellant hereby give true affirmation that I only requested the first 5 pages and the last 5 pages of the following portions of the proceedings from the court reporter. At this time a motion to proceed without pay by affidavit is still pending before the court of appeals. The undersigned agree that the following portions of the proceedings will be submitted to the court are omitted from the court reporter records

- (1) Selection and swearing of the jury, omitted
- (2) Admission of the first five pages appellant requested
- (3) Admission of the last five pages appellant requested

Alice L Roseboro  
1852 Bon Rea Dr  
Rock Hill, SC 29730  
803-579-2331  
Attorney for Appellant



Thomas E Lydon  
1320 Main St 10 th FL  
P O BOX 12519  
Columbia, SC 29211  
803-579-2300  
Attorney for Respondent

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
 ) SIXTEENTH JUDICIAL CIRCUIT  
COUNTY OF YORK ) CASE NO.: 2012-CP-46-1328  
  
WELLS FARGO )  
 )  
vs. ) EXCERPTS OF P.15  
 ) TRANSCRIPT OF RECORD  
 )  
ALICE ROSEBORO )

September 17, 2013  
York, South Carolina

BEFORE THE HONORABLE S. Jackson Kimball

APPEARANCES:

Alice Roseboro, Pro Se

Tommy Lydon, Esquire  
Columbia, South Carolina

SHIRLEY BROOM  
16<sup>TH</sup> Circuit Court Reporter

R



1 THE COURT - He's not withdrawing anything.

2 MS. ROSEBORO - No, you did -- he did say

(OR  
R/O  
on file)

3 something ---

4 MR. LYDON - I withdrew my ---

5 THE COURT - Summary Judgment Motion on the merits  
6 of the complaint.

7 MS. ROSEBORO - On what?

8 THE COURT - Here's -- let me explain to you where  
9 we are.

10 MS. ROSEBORO - I want him to tell me what he did.

11 THE COURT - I'm going to tell you if you'll

12 listen to me. He is withdrawing his Motion for Summary

13 Judgment pertaining to the foreclosure which simply means

14 that we are going to have a full-blown -- at some point we

15 will have a full-blown foreclosure hearing on the whole

16 case.

17 MS. ROSEBORO - So you know why he's withdrawing

18 that? Because, see ---

19 THE COURT - Ms. Roseboro, it doesn't matter.

20 MS. ROSEBORO - Because she lied on her paperwork.

21 THE COURT - All right.

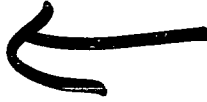
22 MR. LYDON - Need me to prepare an Order, Your

23 Honor?

24 THE COURT - Please.

First Union Mortgage Corporation  
1100 Corporate Center Drive  
Mail Code NC 4777, Bldg B-2  
Raleigh, NC 27607-5045  
(800)-326-5150

First  
Union



November 24, 1999

NOV, 24, 1999

To: Alice Roseboro  
264 Whitgreen Street  
Rock Hill, SC 29730

my assigned loan

Property: Not selected yet.

NO: 8784872

Interest rate: 7.75%

Loan amount: \$25,300

Loan number: 8184872



Congratulations! We are happy to inform you that your loan has been approved subject to the following conditions:

- I. Attorney/Settlement Agent's compliance with our written closing instructions.
- II. Receipt and approval by First Union of the items listed below. You or your real estate agent must submit this information to our office in order to proceed with your closing arrangements.

**FIRST UNION**

First Union Mortgage Corporation  
1100 Corporate Center Drive  
Raleigh, NC 27607

**EXCERPT**

April 02, 2001

04, 2, 2001

087916

XR002

Alice Roseboro  
1852 Bon Rea Drive  
Rock Hill, SC 29730

Re: FUMC Loan number 0008784872

Dear Customer:

### SHORT-YEAR ESCROW STATEMENT

Enclosed is a short year statement reflecting the activity in your escrow account prior to the transfer of your mortgage loan servicing. This statement includes all activity occurring in your escrow account between the dates of your last escrow account review and the release of your loan to Wells Fargo Home Mortgage, INC.

Please review this information as confirmation of the activity in your escrow account. Should you have any questions concerning the current servicing of your mortgage loan, please contact Wells Fargo Home Mortgage, INC. at 1-866-261-5643 Monday through Friday from 8:00AM until 5:00PM, Eastern Standard Time.

First Union Mortgage Corporation appreciated the opportunity to provide service on your mortgage loan, and we thank you for your business.

First Union Mortgage Corporation

\*Footnote\*

I have NOT PAID on this account # 8784872 in 13 YRS, since it was sold in 2001 noted above. Wells Fargo gave me a new account NO in 2001 3XXXXX2.

October 08, 2010

001307 1 AB 0.360 1307/001307/003000 007 01 AC0304 LC170 685

Alice Roseboro  
1852 Bon Rea Dr  
Rock Hill SC 29730-3007



Dear Alice Roseboro :

RE: Loan Number (3-2), Client 685

Wells Fargo Home Mortgage has received your signed modification agreement and has completed the modification process. You will receive monthly billing statements outlining your new payment plan and instructions on where to send your payments. If you are enrolled in electronic withdrawals to make your monthly mortgage payments, you will receive quarterly statements.

Thank you for allowing us to assist you.

If we can be of further assistance, please call us at (800) 551-9808, Monday through Friday, 8 AM to 8 PM, Central Time.

Sincerely,

Wells Fargo Bank, N A is required by the Fair Debt Collection Practices Act to inform you that if your loan is currently delinquent or in default, as your loan servicer, we will be attempting to collect a debt, and any information obtained will be used for that purpose. However, if you have received a discharge, and the loan was not reaffirmed in the bankruptcy case, Wells Fargo Bank, N A will only exercise its right against the property and is not attempting any act to collect the discharge debt from you personally.

Excerpt  
Page  
1

**Modification:** A loan modification is a written agreement between you and the lender that permanently changes the terms of the loan

- Deed In Lieu of Foreclosure:** With a Deed In Lieu of Foreclosure, you transfer ownership of your home to the lender. You would be given a short period of time to move from your home. You would receive a full release of your debt, or a substantial reduction of the debt. This option is not available if there is more than one mortgage or lien on the property. This option is NOT available if your home is a mobile/manufactured home.
- Reinstatement of Your Loan:** If you are able to do so, you would pay the total amount past due in one lump sum

**\* INFO FROM PLAINTIFF'S ATTORNEY \***

**ROGERS AND TOWNSEND LLC**

Excerpt  
Page  
2

**\* INFO ON Sept Letter Excerpt page \***

On September 14, 2011, the loan was referred to outside counsel to initiate foreclosure proceedings. The foreclosure action was a direct result of the loan showing due for the November 01, 2010 through September 01, 2011 mortgage payments.

As of the date of this letter, your loan is due for 13 months.

