

8-7-2014

Original is mailed
with signature

Whitney vs. BOA + SCFCU

Case No: 2014-001371

Case No: 2012-213208

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SC Court of Appeals

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S.C. SUPREME COURT

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SC Court of Appeals

Pages 1 of 6

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S.C. SUPREME COURT
Petitioner,

IN THE STATE OF SOUTH CAROLINA
In the Supreme Court
Case no: 2014-001371

APPEALING the South Carolina's APPEAL COURT
Appellate Case No. 2012-213208

APPEAL of Dorchester County Circuit Trial
COURT OF COMMON PLEAS
Master of Equity/servicing as Circuit – Judge Maite D. Murphy
Case no: 2012-CP-18000539

Roger L. Whaley

vs.

South Carolina Federal Credit Union and BANK of AMERICA..... Respondents.

PETITIONER/WHALEY's REPLY to - SOUTH CAROLINA FEDERAL CREDIT UNION'S Admitted REPLY to SCFCU's OWN!! filed MOTION TO DISMISS dated "JULY 8, 2014", titled - "REPLY TO RETURN TO THE MOTION TO DISMISS ON BEHALF OF SOUTH CAROLINA FEDERAL CREDIT UNION" -

NOW COMES, the Petitioner/Roger L. Whaley/a/k/a Petitioner/Whaley's continued recent research findings in Respondent/South Carolina Federal Credit Union /a/k/a/SCFCU's Court stamp filed document titled, "REPLY TO RETURN TO THE MOTION TO DISMISS ON BEHALF OF SOUTH CAROLINA FEDERAL CREDIT UNION" dated "JULY 28, 2014", which Shows/Admits/and/or appears to be attempting to Embarrass!, this! SUPREME Court's CLERK's known! **ERROR!**and or had Bias Interest, when the CLERK INSTRUCTED, Pro Se Petitioner/ Whaley to filed "an **AMENDED RETURN**"- instead to file an AMENDED RESPONSE/or REPLY; as well as SCFCU's 7/28/2014 pleading ALLEGED (without any produced documents) that "...the **APPELLATE CASE MANAGEMENT SYSTEM** Indicated that a **RETURN** was RECEIVED by **THIS! COURT! ON! JULY 18, 2014**", regarding Respondent/SCFCU's UNTIMELY/and Improper filed MOTION TO DISMISS...pursuant to Rule 240(c)"; regarding Petitioner/Whaley's ONLY! filed document filed in this Court on 7/18/2014, is titled - "Petitioner/Whale's Response/or REPLY to Respondent, SOUTH CAROLINA FEDERAL CREDIT UNION'S Motion to Dismiss (and Memorandum in Support) or in the Alternative, Motion to Strike Appendix on Behalf of RESPONDENT SOUTH CAROLINA FEDERAL CREDIT UNION"; *(See attached Exhibits 1,2,3,4,5,6 & 7, shows SCFCU's intentional FRAUD, Return claims allegedly made by this said SUPREME COURT's CLERK, Involving the Clerk's entry on Case Management System; or SCFCU's 7/28/2014 Pleading WITNESS, this Supreme Court's CLERK placed Erred/or Bias Case Management Entry of Petitioner/Whaley's filed RESPONSE/or REPLY to SCFCU's Motion to Dismiss filed in this Court on 7/18/2014)

As the following is further stated:

¹ Respondent/SCFCU's 7/28/2014 "Reply to RETURN..." ADMITS! to filed an REPLY! to its OWN! filed Motion to Dismiss, where SCFCU also ADMITS! that - "...OUR MOTION TO DISMISS DOES NOT SERVE!! as! OUR! RETURN!! to the Petition for a Writ of Certiorari."; Regarding SCFCU's 7/28/2014 pleading bring (yet! again) NEW!! and ADDITIONAL CLAIMS *(First NEW ADDED Claims brought in the LOWER TRIAL COURT ADDED to Petitioner/Whaley's COMPLAINT Claims , involving the FEDERAL Case 3-Hebrew Boys BUSINESS/and the FEDERAL Court Appointed alleged RECEIVER-who is also! this! Supreme Court's BOARD MEMBER, Mr. BEATTIE B. ASHMORE)* now! again!, SCFCU ADMITS! TO its NEW ADDED CLAIMS now! filed in this Supreme Court; involving SCFCU's UNTRUTHFUL/or Fraudulent allegations! that SCFCU's filed MOTION to DISMISS was filed PURSUANT with the RULE 240(b) - But! was actually FILED ONLY under SCACR Rule 240(c)- which DOES! NOT!! STAY!! - the TIME! LIMITATION in which SCFCU MUST! have ALREADY! FILED! its RETURN! to PETITION, pursuant with SCACR 242(f). (See Exh. A, SCFCU's JULY 8, 2014 filed "MOTION TO DISMISS...") therefore SCFCU continue! to request SPECIAL FAVORS from the said PRIOR APPEALS and Lower Trial COURTS, and now! from this Supreme Court - "Upon this Court's Disposition of OUR MOTION to DISMISS, SHOULD!! WE! be! REQUIRED!! to FILE a RETURN!! to the Petition for a WRIT of Certiorari."; Whereas Respondent/SCFCU and its said LEGAL ADVISORS, appears to BELIEVE that the S.C. LAWS and Rules does not apply to RESPONDENT(s).

SCFCU'S 7/28/2014 PLEADING ADMITS This SUPREME COURT'S CLERK (always! Knew!/a/k/a/)
 "...this! COURT! WELL! KNOWS!!, a MOTION TO DISMISS is SEPARATE and APART from!!

A RETURN! to a PETITION for a WRIT OF CERTIORARI" ² –Otherwise SCFCU appears to ADMIT! this
 SUPREME COURT CLERK's LETTER of INSTRUCTIONS to Pro Se PETITIONER/WHALEY to file a "AMENDED
 RETURN" was and intentional! Fraudulently! INSTRUCTION by this said SUPREME COURT's CLERK!! to
 MISLEAD! Pro Se PETITIONER/Whale, in the attached LETTER dated "JULY 24, 2014".³ SCACR Rule 242(b)(1 & 2)

1. SCFCU's MOTION TO DISMISS claimed that Petitioner/Whaley's FAXED DOCUMENTS were not a
 Perfected FAX! Delivery, was again! FRAUD Claims made, due to Respondent/SCFCU did not comply with this
 Supreme Court Rule 242(f)), when SCFCU ADMITS! 7/28/2014 pleading that SCFCU NEVER! filed its required
 RETURN to PETITION for Writ of Certiorari, due to SCFCU admits! it filed its MOTION TO DISMISS dated July 8,
 2014, shows! filed pursuant with SCACR 240(c), which does! not! STAY! SCFCU's time in which to have FILED
 its required "RETURN TO PETITION" pursuant with SCACR 242(f), when SCFCU NEVER! filed its MOTION TO
 DISMISS filed under 240(b), therefore SCFCU's time to file its RETURN TO PETITION is! not! at a STAY!, and
 therefore shows Petitioner/Whaley's Petition for Writ of Certiorari must/or can be Granted by this said Supreme Court.

1a): Research found and provided documents shows Respondent/SCFCU, Fraudulently/attempted to
 MISLEAD this said SUPREME COURT in its attached pleading dated 7/28/2014, by appearing to showing this
 Supreme Court's Embarrassing ERRORS of this said Supreme Court's CLERK/and/or FRAUD CLAIMS made
 against this said Supreme Court Clerk regarding this said Court's Case Management System, IMPROPER/or Altered

² Respondent/SCFCU, since it did not produced ANY provided DOCUMENTED EVIDENCE, that supports its allegation in SCFCU's "REPLY to RETURN TO
 (SCFCU'S OWN! filed) MOTION TO DISMISS..." dated 7/28/2014, appears to be in RETALIATION!! AGAINST! this Supreme Court Clerk! who advised
 PETITIONER/Whaley that his PETITION FOR WRIT OF CERTIORARI, was not! DUE! UNTIL! the DATE! JUNE 26, 2014, which SCFCU ADMITS! this
 SUPREME COURT RECORDS shows Petitioner/Whaley TIMELY FILED his PETITION for Writ of Certiorari on or BEFORE! the DATE "JUNE 25, 2014".
 Which again! DEFEATS!! SCFCU's claims in its UNTIMELY/and IMPROPER filed MOTION TO DISMISSED dated "JULY 8, 2014", which made claims and
 UNSUPPORTED provided LAW and Rule(s) – Fraudulently claimed that Petitioner/Whaley's PETITION for Writ of Certiorari was allegedly untimely filed, when
 this said SUPREME COURT CLERK Advised PRO SE Petitioner/Whaley that his PETITION for WRIT OF CERTIORARI was not! due! until JUNE 26, 2014,
 which involved Petitioner/Whaley's filed CORRECTIONS NOTICES, RESULTING in this SUPREME COURT CLERK's LETTER dated "JULY 24, 2014", in
 ERROR/or OTHERWISE wrote the WROTE! reasons for Petitioner/Whaley MUST file an AMEND RESPONSE/or REPLY that was filed on 7/18/2014; but
 instead this said SUPREME COURT CLERK in ERROR/or otherwise WROTE and instructed PRO SE Petitioner/Whaley to have filed an "AMENDED RETURN";
 Although SCFCU's said Pleading dated 7/28/2014 –ADMITS! Petitioner/Whaley FAXED COPY of Petitioner's AMENDMENT, DID NOT JUST READ as
 being an AMENDED RETURN, which SCFCU ADMITS as of 7/28/2014 that SCFCU always ACCEPTED! Petitioner/Whaley filed INSTRUCTED AMENDMENT
 as being "...RECEIVED, via FAX, what PURPORTS to be a CORRECTED!! OR!! AMENDED Return OR!! RESPONSE!! to the MEMORANDUM OF
 LAW in SUPPORT of the MOTION to DISMISS and! the CERTIFICATE of SERVICE, in an ATTEMPT!! TO CORRECT!! the DEFICIENCIES!! THIS!!
 COURT! has! HIGHLIGHTED." Therefore SCFCU ADMITS its CLEAR!! UNDERSTANDING! has ALWAYS! been Petitioner/Whaley FILED! a Proper!and
 TIMELY RESPONSE/or REPLY!! to SCFCU's filed MOTION TO DISMISS. And ONLY! this! Supreme Court's CLERK!! gave ERRED/or said BIAS INTEREST
 Wrong! Instructions in this! Supreme Court's LETTER to PETITIONER/Whaley on "JULY 24, 2014", which SCFCU's attached 7/28/2014 PLEADING ADMITS!
 was PROPER DELIVERED to SCFCU from! this! said SUPREME COURT'S CLERK!! on the DATE "JULY 25, 2014". Which Shows SCFCU wrote an
 INTENTIONAL Fraudulent "REPLY to RETURN to (SCFCU'S own! filed) MOTION TO DISMISS..." dated 7/28/2014; Pursuant with SCACR Rules 242,
 (b)(1,2,3,4,5) involving all the QUESTIONS/or ARGUMENTS in Petitioner's filed! Petition for Writ of Certiorari.

³ Although, Pro Se Petitioner/Whaley's complied! with this Supreme Court's Erroneously instructed AMENDMENT, dated 7/24/2014, SCFCU also ADMITS as of
 7/28/2014 that PETITIONER/Whaley's AMENDMENT, also filed his AMENDED CORRECTIONS as being ALSO! a AMENDED RESPONSE – as SCFCU
 ADMITS! "On JULY 28, 2014, Respondent SCFCU RECEIVED, via FAX *(as SCFCU ADMITS! to a Perfected! Delivery! by FAX! From! Petitioner/Whaley –
 whom SCFCU again! ADMITS! was ACCEPTED! By! SCFCU; which DEFEATS! SCFCU's Fraud claims in its MOTION TO DISMISS – that
 Petitioner/Whaley's FAX to SCFCU was NOT! PERFECTED!; SAME as SCFCU also! ACCEPTED!! Petitioner/Whaley's HAND-WRITING located on
 Petitioner/Whaley's CASHIER CHECKS which Respondent/SCFCU (and Respondent/BOA, as well as the said LOWER TRIAL COURT JUDGE, and the
 APPEALS COURT Officials) always!! ACCEPTED!! the said Found RESEARCH!! HAND-WRITING located on Petitioner's PROVIDED EXHIBITS and/or
 SUPPORTIVE DOCUMENTED EVIDENCE, ACCEPTED by both said RESPONDENTS! pursuant with Respondent's! OWN! provided RULE SCRCR 10(c);

Therefore MUST also be ACCEPTED by this said Supreme Court, and this said Court's CLERK(s) pursuant ALSO with Respondent(s)'
 own! provided RULE SCACR Rule 210, and pursuant with SCACR Rule 242(b)...; WHEREAS SHOWS SCFCU filed in its Improper!and said UNTIMELY
 filed MOTION TO DISMISS, again! shows INTENTIONAL FRAUD! and UNTRUTHFUL Claims, involving SCFCU's FILED Untimely filed MOTION TO DISMISS,
 pursuant with SCFCU's filed Rule SCACR 240(c), which DID! NOT!! STAY!! the TIME LIMIT in which SCFCU SHALL/or must have filed SCRCU's "RETURN to
 PETITION" pursuant with SCACR 242(f)) – Which SCFCU's 7/28/2014 said pleading ADMITS!! SCFCU NEVER! Timely Filed its required RETURN to PETITION;

filing of Petitioner/Whaley's filed RESPONSE/or REPLY to SCFCU's filed MOTION TO DISMISS, which SCFCU even! ADMITS! to this! said Supreme Court, that "...THIS!! COURT! WELL! KNOWS!! a MOTION TO DISMISS is Separate and APART from a RETURN!! to! a PETITION! FOR a WRIT of CERTIORARI". As well as, SCFCU admits!! that SCFCU suppose to have TIMELY!! FILED its RETURN, when SCFCU ADMITS! "...OUR MOTION! to DISMISS!! DOES! NOT! SERVE!! AS! OUR! RETURN!! to! the! PETITION for a WRIT of CERTIORARI.

**SCFCU'S 7/28/2014 PLEADING AGAIN! REQUESTS SPECIAL FAVORS!
NOW! from this SUPREME COURT'S OFFICIALS**

1b): SCFCU! instead! of filing its required RETURN TO PETITION as of 7/28/2014, pursuant with SCACR 242(f), SCFCU's admittance! in its 7/28/2014 pleading, appears to REQUESTED again! SPECIAL FAVORS! (for SCFCU to NOT! BE UPHELD! with the same! standards of LAWS and PROCEDURES as Pro Se Petitioner/Whaley, regarding this APPELLATE COURT RULES and LAW(s)...** and now! is attempting to MISLED/and TRICK this said SUPREME COURT/and/or this Supreme Court's CLERK(s), to provide also! SPECIAL FAVORS to Respondent/SCFCU, whose 7/28/2014 pleading requests that "...Upon this Court's DISPOSITION of OUR (untimely and improper filed) MOTION TO DISMISS, Should! WE! BE! REQUIRED! TO! FILE! A! RETURN! to the PETITION for a WRIT of CERTIORARI..."; As SCFCU appeared BELIEF/and or prayer is that this said SUPREME COURT will NOT! (actually) REVIEW! SCFCU's already! filed MOTION TO DISMISS claims and provided LAW(s) and Rule(s), which SCFCU ONLY! filed its Motion to Dismiss Claims pursuant with SCACR 240(c)- whereas, NEVER! placed a STAY on the time limitation for SCFCU to have filed SCFCU's ADMITTED! required "RETURN to PETITION for Writ of Certiorari" that was timely filed by Petitioner/Whaley. Therefore shows SCFCU's requested SPECIAL FAVORS! from this said Supreme Court/or from this Court's CLERK(s). Pursuant with Rule 242.2. Petitioner/Whaley's attached EXHIBITS 1,2,3,4,5,6,&7 shows Petitioner/Whaley's ONLY! documents filed in this Supreme Court on! 7/18/2014, has ONLY!! the proper! written! title - "Petitioner/Whaley's RESPONSE/or REPLY to Respondent, SOUTH CAROLINA FEDERAL CREDIT UNION's Motion to Dismiss (and Memorandum in Support) or, In the Alternative, Motion to Strike Appendix on Behalf of RESPONDENT SOUTH CAROLINA FEDERAL CREDIT UNION", which even! SCFCU admits! was FILED also within! THIS

⁴ **[just as Petitioner/Whaley's always filed claims with produced! supportive documented EVIDENCE, to the Lower Trial Court and! produced again! to the APPEALS Court, which Both said COURTS own! provided LAWS and RULES, such as, Henning V. Kaye, always UPHELD Petitioner/Whaley's filed Claims and produced documented evidence, accepted also by BOTH said RESPONDENTS/or SCFCU who Tricked! and/or Misdled!! the Appeals Court and the said Lower Trial Court's Master of Equity Judge/who REPLACED an Experienced! CIRCUIT COURT JUDGE] and is now! attempting to TRICK and MISLEAD, as well as file! FRAUD Documents/and ADDED!! ADDITIONAL NEW! CLAIMS, and new! LAWS/or RULES within this! said SUPREME Court, as of JULY 8, 2014 in SCFCU's filed UNTIMELY and Improper filed MOTION TO DISMISS, and! now! in SCFCU's filed 7/28/2014 pleading.

SUPREME COURT Case Management System, (a/k/a Supreme Court's RECORDS) also! on "JULY 18, 2014" – Pursuant with Rules SCACR 242.

2.(a): although SCFCU's 7/28/2014 same pleading also! appears to shows an UNTRUE/or FRAUD DOCUMENT either! by SCFCU/or this said Supreme Court's CLERK, which SCFCU claimed (without providing ANY supportive DOCUMENTATION) ADMITS that THIS! SUPREME COURT/after! SCFCU's alleged – "...REVIEW of the APPELLATE CASE MANAGEMENT SYSTEM INDICATES!! that AI RETURN!! was RECEIVED!! by this!! COURT!! on!! JULY 18, 2014."... Although! SCFCU DID NOT state that! the said alleged! RETURN Received on JULY 18, 2014, was NEVER! CLAIMED! by SCFCU to been FILED from! this! Petitioner/Whaley. Pursuant with SCACR 242(a&b)

SCFCU'S 7/28/2014 FILED PLEADING SHOWS and ADMITS!

SCFCU BROUGHT! NEW! ISSUES/Claims/and/RULES into Petitioner/Whaley filed "Petition for Writ of Certiorari"; BUT SCFCU'S FILED 7/28/2014 PLEADING SHOWS ONLY! SCFCU'S FILED MOTION TO DISMISS- dated 7/08/2014, AND SCFCU'S 7/28/2014 again! BROUGHT! THOSE said NEW! ISSUES and CLAIMS, or NEW! RULES and LAW(s) in this! SUPREME COURT – which SCFCU/and its LEGAL COUNSELOR(s)' ATTEMPTS TO MISLEAD this SUPREME COURT that- PETITIONER FILED said NEW ISSUES/Although! SCFCU ADMITS!! in its 7/28/2014 FOOTNOTE 1, THAT SCFCU WAS NEVER! SERVED! WITH "...A COPY of the RETURN TO THE MOTION TO DISMISS" ...in which SCFCU is NOW! WANTS this Supreme Court to BELIEVE SCFCU is in an ALLEGED "REPLY to RETURN to THE MOTION TO DISMISS"

3. SCFCU's "Reply to RETURN to the MOTION TO DISMISS..." dated 7/28/2014, *(See Exhibits Aa, B, C, SCFCU's Reply to Return to Mt to Dismiss) also! ADMITS!/or shows again! ** (just as both said above RESPONDENTS/or SCFCU, brought NEW/ADDED ISSUES/Claims and FEDERAL and STATE CONFLICTING LAWS entered in the Prior Lower Trial Court and in the Appeal Court)** shows How and WHY the RespondentS/or/SCFCU in its now! 7/28/2014 pleading shows brought NEW ISSUE/Claim/and RULE, when SCFCU states that – SCFCU "...Will ONLY!! ADDRESS! NEW!! MATTERS!! (allegedly) RAISED! BY! PETITIONER'S RETURN!! to OUR MOTION in THIS!!! REPLY."; - although, SCFCU 7/28/2014 pleading also! ADMITS! and shows in its FOOTNOTE 1, SCFCU's UNTRUTH! and FRAUD Claims that Petitioner/Whaley allegedly "...RAISED..." the said NEW MATTERS, when SCFCU ADMITS!! also! on 7/28/2014 regarding this Court "July 24, 2014" (See Exh. aa) - shows why SCFCU admits that -

***...On July 25, 2014, Counsel for RESPONDENT SCFCU!! RECEIVED!! a COPY! of this!!! COURT'S!! DEFICIENCY!! NOTICE!! TO!! Mr. Whaley REGARDING! the FILING! of the RETURN!! to! the MOTION! TO! DISMISS!. However! Respondent SCFCU!! was!! NEVER!! SERVED!! with!! A! COPY!! of the RETURN!! to! the MOTION TO DISMISS." Pursuant with SCACR Rules 242**

4. SCFCU's filed MOTION TO DISMISS, admits! if the said SERVICE WAS! NOT! Property Delivered!/or was NEVER! DELIVERED! to the OPPOSING Party/or to the Party, the said Delivery was not Perfected. Therefore shows SCFCU ADMITS! that SCFCU NEVER RECEIVED ANY Copy of Petitioner/Whaley's alleged "RETURN" to SCFCU'S filed MOTION TO DISMISS, but! SCFCU does! ADMITS! also! in its Footnote 1, THAT, SCFCU DID!! RECEIVED! Perfected!! by FAXED Delivery - "...what purports to be a CORRECTED..." or AMENDED -

RESPONSE to the SCFCU's Untimely filed MOTION TO DISMISS, that was filed also with a CERTIFICATE OF SERVICE, "...in an ATTEMPT to CORRECT!! the DEFICIENCIES THIS!! COURT!! has HIGHLIGHTED...", which SCFCU further ADMITS! on its pages 1 & 2, dated 7/28/2014 pleading admits! that- "...THIS! COURT! WELL!! KNOWS!!, a MOTION to DISMISS IS SEPARATE and APART! from a RETURN!! to a PETITION for Writ of Certiorari."...which SCFCU admits! further! that SCFCU NEVER! ADDRESSED the ARGUMENTS! in Petitioner/Whaley's filed Petition for a Writ of Certiorari...due to SCFCU's filed MOTION TO DISMISS "...DOES NOT SERVE!! as OUR! RETURN!! to the PETITION for Writ of Certiorari.". Pursuant with SCACR Rule 242

4a): Which SCFCU DOES ADMITS! that its required to have SERVED its "RETURN to PETITION" pursuant with SCACR Rule 242(f), but! never! Complied!! to this said Supreme Court's ORDERED/or INSTRUCTED RULE, Instructed in this! Court LETTER dated "JUNE 25, 2014", Pursuant under SCACR 242, which instructed that - "...ALL PARTIES to this MATTER are ADVISED that ALL FILING MUST COMPLY with Requirements of RULE 242 of the South Carolina APPELLATE COURT RULES (SCACR)... ADDITIONALLY, ANY!! FILINGS!! Submitted!! BY! COUNSEL!! admitted! in SOUTH CAROLINA MUST!!! INCLUDE!! COUNSEL'S!! BAR!!! Number!.

**SCFCU'S 7/28/2014 "CERTIFICATE OF SERVICE"/proof of Service
Nor SCFCU's LAST PAGE 7/28/2014 pleading WITH the NAMES and OF ALL!!
COUNSELORS NAMED as being a LEGAL COUNSELOR involving THIS CASE MATTER
SHOWS on (attached Exh. B & C) again! SCFCU NEVER! COMPLIED with
the INSTRUCTIONS [not only of the LOWER Trial Court, and APPEALS COURT, but also]
NEVER COMPLIED of this! SUPREME COURT "JUNE 25, 2014" LETTER (See Exh. a)
WHEN SCFCU NEVER PLACED NOT! ANY! of the REQUIRED! BAR NUMBERS!
located on SIGNATURE PAGE, nor! located on PROOF OF SERVICE/or Certificate of Service page**

5. SCFCU's filed 7/28/2014 "REPLY to RETURN..." of SCFCU's OWN! filed MOTION TO DISMISS (See Exh. A) shows that SCFCU was UNTRUTHFUL and FRAUDULENT, or attempted to MISLEAD this Supreme Court's CLERK and/or this Supreme Court, that SCFCU's filed MOTION TO DISMISS was filed pursuant SCACR Rule 240(b), when the attached Exhibit A, of SCFCU's MOTION TO DISMISS indeed shows, the ONLY! RULE that SCFCU provided to support its MOTION TO DISMISS was under the UNDER 240[c], which NEVER! allowed a STAY!!, so that SCFCU's said named Legal Counselor(s) who ADMITTED! to have NEVER! filed ANY! required "RETURN TO PETITION" pursuant with SCACR Rule 242(f). Therefore supports the Granting of Petitioner/Whaley's filed Petition for Writ of Certiorari. Pursuant with SCACR Rule 242(b)


6. SCRCU's own! Legal Counselor's signed and filed "REPLY TO RETURN TO THE MOTION TO DISMISS on BEHALF of SOUTH CAROLINA FEDERAL CREDIT UNION" dated stamped by this Supreme Court dated "July 28, 2014", shows on SCFCU's said pleading on page 2, Signature page, and Certificate of Service, showing ALL the NAMES of ALL the alleged!! LICENSED BAR Legal Counselors who was at some time period, who submitted some type pleadings within this said case matter, was INSTRUCTED BY this said SUPREME COURT to PLACE Each! of

their BAR Number, but! again! you can see, that NEITHER! SCFCU's Legal Counselor again! NEVER!! COMPLIED with the Instructed orders of this said Appellate Supreme Court, just as recorded/or DOCUMENTED Copies of SCFCU's records shows NEITHER Counselor(s) Complied with Appeals Court's mailed Instructions to filed a REQUIRED Timely filed "INITIAL BRIEF" and DESIGNATION of MATTER, just as SCFCU NEVER complied with the Lower Trial Court's written instructed EMAILED instructions for SCFCU to have prepared its OWN filed alleged Proposed Order. Resulted in RespondentS/or SCFCU's continued!! NON-COMPLIANCE with ALL these said named Court's written instructions, which resulted in ONLY SPECIAL FAVORS were applied to the said RESPONDENTS/or SCFCU's Legal Counselor(s), who indeed DID NOT COMPLY to this said Supreme Court's Instructed written instructions/a/k/a ORDERS, dated JUNE 25, 2014.

CONCLUSION

WHEREFORE, the attached research found documents of attached 12 EXHIBITS, are ONLY of documents previously filed within this said Supreme Court which obtained no-research hand-writing located on neither said documents, if this said Supreme Court, personal wants COPIES without and found research located on the said documents. THEREFORE, any other required information, can be produced by this said Pro Se Petitioner/Whaley, who has always been in compliance with the Instruction letters/and/or WRITTEN signed COURT ORDERS of ALL the said named Courts. Whereas any corrections need, please do not hesitate to contact this said PRO SE Petitioner, who will immediate comply with this said Court's found deficiencies.

AUGUST 7, 2014



Roger L. Whaley, Pro Se Petitioner
8673 Laurel Grove Lane
North Charleston, S.C. 29420

SEE NEXT PAGE – TYPE PROOF OF SERVICE
as requested to be on a separate page....

IN STATE OF SOUTH CAROLINA
IN the SUPREME COURT
Case No. 2014-001371

RECEIVED

AUG 08 2014

APPEALED FROM S.C. APPEAL COURT
Case no. 2012-213208

SC Court of Appeals

ORIGINAL APPEAL from LOWER TRIAL COURT Dorchester County
COURT OF COMMON PLEAS
Replacement Master of Equity Judge/served as Circuit Court Judge/Maite D. Murphy
Case no. 2012-CP-18-539

Roger L. Whaley, Pro Se Pro se, Petitioner,

v.

SOUTH CAROLINA FEDERAL CREDIT UNION and BANK of AMERICA...Respondents.

PROOF OF SERVICE

I certify that I have served BOTH Respondents, South Carolina Federal Credit Union and Bank of American (althoughl this said PETITIONER/Whaley's said REPLY is Replying only to SCFCU's filed "REPLY to RETURN to the MOTION TO DISMISS on Behalf of South Carolina Federal Credit Union"), whereas all proper parties has been properly and timely served by this said Petitioner/Whaley.

August 7, 2014

S

Roger L. Whaley, Pro Se Petitioner,
8673 Laurel Grove Lane
North Charleston, S.C. 29220

cc: NELSON MULLIN RILEY & SCARBOROUGH, LLP
Jody A. Bedenbaugh, S.C. Bar No. 71176
Erik T. Norton, S.C. Bar No. 73860
Tara C. Sullivan, S.C. Bar No. 79806
1320 Main Stree/17 Floor
Post Office Box 11070 (29211-1070)
Columbia, South Carolina 29201
(803) 799-2000

RICHARDSON & PLOWDEN, Law Firm
Sheila M. Bias, Esquire - No Bar No.
Drew H. Butler, Esquire- No Bar No.
Caleb M. Riser, Esquire-No Bar No.
1900 Barnwell Street (29201)
P.O. Drawer 7788
Columbia, S.C. 29202
803-771-4400

ATTACHMENTS - 12
WHALEY'S REPLY to SCFCU's REPLY to its OWN filed MOTION TO DISMISS
dated 7/28/2014



Exh. a

The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT
BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA
29211
1231 GERVAAS STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1060
FAX: (803) 734-1489
www.sccourts.org

June 25, 2014

Mr. Roger L. Whaley
8673 Laurel Grove Lane
North Charleston SC 29420

Re: Roger Whaley v. SC Federal Credit Union
Appellate Case No. 2014-001371

Dear Mr. Whaley:

This Court has received your Petition for Writ of Certiorari and Appendix, and the case has been assigned the appellate case number that appears above. Please use this number on all future correspondence relating to this matter.

All parties to this matter are advised that all filings must comply with the requirements of Rule 242 of the South Carolina Appellate Court Rules (SCACR). The SCACR are available online at www.sccourts.org/courtreg. Additionally, any filings submitted by counsel admitted in South Carolina must include counsel's bar number.

The attention of the parties is directed to the order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. The order can be found at www.sccourts.org/whatsnew/displaywhatsnew.cfm?indexID=932. Please note that the responsibility for insuring that information is redacted or sealed as required by this order rests with counsel and the parties. This office will not review filings for redaction or to determine if materials should be sealed.



Exh. ~~aa~~

The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT
BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA
29211
1231 GERVAIS STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1080
FAX: (803) 734-1499
www.sccourts.org

July 24, 2014

Mr. Roger L. Whaley
8673 Laurel Grove Lane
North Charleston SC 29420

Re: Roger Whaley v. SC Federal Credit Union
Appellate Case No. 2014-001371

Dear Mr. Whaley:

This Court has received your corrections to the footnotes in your return. If you want this Court to consider these corrections, you will need to serve and file an amended return that fully incorporates these corrections. You will need to provide this Court with an original and 6 copies of the amended return along with a proof of service showing that a copy of the amended return has been served on opposing counsel. The amended return must be served and filed within ten (10) days of the date of this letter.

Very truly yours,

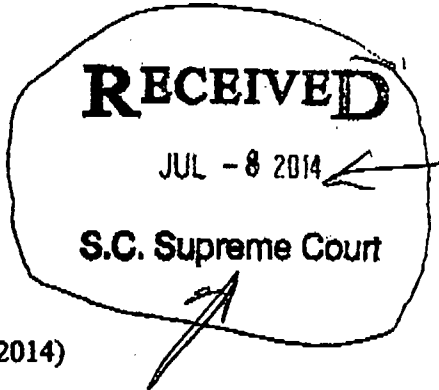
CLERK

cc: Erik Tison Norton, Esquire
Jody Alan Bedenbaugh, Esquire
Tara C Sullivan, Esquire
Drew Hamilton Butler, Esquire
Sheila Marlouvon Bias, Esquire
Caleb Martin Riser, Esquire

014-11

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTOR COUNTY
Court of Common Pleas
Maite D. Murphy, Circuit Court Judge



On Order of Dismissal (S.C. Ct. App. Filed Feb. 27, 2014)
Appellate Case No.: 2014-001371

Roger L. Whaley.....Petitioner

vs.

South Carolina Federal Credit Union and Bank of AmericaRespondents.

MOTION TO DISMISS OR, IN THE ALTERNATIVE, MOTION TO STRIKE
APPENDIX ON BEHALF OF RESPONDENT SOUTH CAROLINA FEDERAL
CREDIT UNION

Respondent South Carolina Federal Credit Union ("SCFCU") hereby
moves this Court for an Order dismissing Petitioner's Petition for a Writ of
Certiorari as untimely. Alternatively, and should this Court accept Petitioner's
untimely filing, SCFCU moves to strike the Appendix filed by Petitioner due to
extraneous information found on the documents included in the filed Appendix.

Pursuant to Rule 240(c), SCACR, the accompanying Memorandum of Law
supports this Motion.

[SIGNATURE TO FOLLOW]

Exh. Aa

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTOR COUNTY
Court of Common Pleas
Maite D. Murphy, Circuit Court Judge

RECEIVED
JUL 28 2014
S.C. Supreme Court

On Order of Dismissal (S.C. Ct. App. Filed Feb. 27, 2014)
Appellate Case No.: 2014-001371

Roger I. Whaley.....Appellant,

vs.

South Carolina Federal Credit Union and Bank of AmericaRespondents.

**REPLY TO RETURN TO THE MOTION TO DISMISS ON BEHALF OF SOUTH
CAROLINA FEDERAL CREDIT UNION**

Respondent South Carolina Federal Credit Union ("SCFCU") hereby submits this brief Reply and Response to the Return to our Motion to Dismiss. SCFCU specifically incorporates by reference as if repeated herein verbatim its arguments in its Motion to Dismiss and supporting Memorandum, and will only address new matters raised by Petitioner's Return to our Motion in this Reply.

As this Court well knows, a Motion to Dismiss is separate and apart from a Return to a Petition for a Writ of Certiorari. Accordingly, any relief requested by Petitioner regarding her Motion to Dismiss

On July 25, 2014, counsel for Respondent SCFCU received a copy of this Court's deficiency notice to Mr. Whaley regarding the filing of the Return to the Motion to Dismiss. However, Respondent SCFCU was never served with a copy of the Return to the Motion to Dismiss. A review of the Appellate Case Management System indicates that a Return was received by this Court on July 18, 2014. On July 28, 2014, Respondent SCFCU received, via fax, what purports to be a corrected or amended Return (or Response to the Memorandum of Law in Support of the Motion to Dismiss and the Certificate of Service) in an attempt to correct the deficiencies this Court has highlighted. Although it does not appear that the Amended Return is a proper amendment nor has Respondent SCFCU actually received the Return to its Motion to Dismiss, in the interest of judicial economy, Respondent SCFCU will respond briefly to this Motion.

Exh. B

not addressing the arguments in his Petition for a Writ of Certiorari should be rejected as our Motion to Dismiss does not serve as our return to the Petition for a Writ of Certiorari. Upon this Court's disposition of our Motion to Dismiss, (should we be required) to file a Return to the Petition for a Writ of Certiorari, same will be filed at that time and in accordance with this Court's orders. See Rule 240(b), SCACR ("A motion to dismiss an appeal ... shall, however, automatically stay the time limits for perfecting the appeal until the motion is decided.").

Based on the foregoing, our Motion to Dismiss, and Memorandum in Support thereof, Respondent SCFCU respectfully requests that this Court dismiss the Petition for Writ of Certiorari as untimely or, in the alternative, issue an Order striking the appendix filed by Mr. Whaley.

Respectfully submitted,

Sheila M. Bias

Drew H. Butler, Esquire
 Caleb M. Riser, Esquire
 Sheila M. Bias, Esquire
 RICHARDSON PLOWDEN & ROBINSON, P.A.
 1900 Bamwell Street (29201)
 P.O. Drawer 7788
 Columbia, South Carolina 29202
 803-771-4400

*Counsel for Respondent South Carolina Federal
 Credit Union*

July 28, 2014

Exh C

RECEIVED
JUL 28 2014
S.C. Supreme Court

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM DORCHESTOR COUNTY
Court of Common Pleas
Maite D. Murphy, Circuit Court Judge

On Order of Dismissal (S.C. Ct. App. Filed Feb. 27, 2014)
Appellate Case No.: 2014-001371

Roger L. Whaley Appellant,

v.

South Carolina Federal Credit Union and
Bank of America Respondents.

** SCFCU proof of service
Never state that it is
Reply to Return to Dismiss
the Motion was from
Plt. Whaley*

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., attorneys for Respondent South Carolina Federal Credit Union, do hereby certify that I have this date served the foregoing Reply to Return to the Motion to Dismiss on behalf of Respondent South Carolina Federal Credit Union by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the following:

Roger L. Whaley
8673 Laurel Grove Lane
North Charleston, South Carolina 29420

Tara C. Sullivan, Esquire
Erik T. Norton, Esquire
Jody A. Bedenbaugh, Esquire
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 11070
Columbia, South Carolina 29211

Never complied with his Supreme Court letter June 25, 2014 Request that any Caen sel. Adm. in S.C. Must include Caen sel's Ba Number

Daisy Bonds
Daisy F. Bonds

Admitted None Attorney

Dated: July 28, 2014

[Signature]

Exh 1

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEALING the South Carolina's APPEAL COURT
Appellate Case no. 2012-213208

APPEAL of Dorchester County Circuit Trial
Court of Common Pleas
Master of Equity/serving as Circuit - Judge Maite D. Murphy

Page 1 of 6 - Attachments-14
/

Roger L. WhaleyPetitioner/Appellant,

vs.

South Carolina Federal Credit Union and Bank of AmericaRespondents.

Petitioner/Whaley's RESPONSE/or Reply to Respondent,
SOUTH CAROLINA FEDERAL CREDIT UNION's Motion to Dismiss (and Memorandum in Support) or, In the
Alternative, Motion to Strike Appendix on Behalf of (RESPONDENT SOUTH CAROLINA FEDERAL CREDIT UNION

COMES NOW, Petitioner/Plaintiff/Appellant, Roger L. Whaley/a/k/a Petitioner/Whaley writing his responses/or Reply ONLY to the Respondent, South Carolina Federal Credit Union/a/k/a SCFCU, who ONLY filed SCFCU's said motion to dismiss/and said memorandum in support/a/k/a "Memorandum", to be reviewed by this said Supreme Court involving Petitioner/Whaley's filed and this Supreme court's acceptance of Petitioner's Writ of Certiorari and Appendix, after Petitioner Corrected this said court's requested "deficiency...of...the...proof of service...", which Petitioner/Whaley did timely complied, as Petitioner/Whaley respond/or reply by the below numbered statements;

1. Respondent/SCFCU's filed motion to dismiss and Memorandum is not in compliance with the SCACR Rule 240(c)(3),¹ nor Rule 242(f)², when SCFCU's complete motion and Memorandum does not address absolutely none of the required "...Argument on each Question...presented for Review...", written in Petitioner/Whaley's Writ of Certiorari, which Respondent/SCFCU ADMITS! was FAXED as filed in this said Supreme Court, with the date June 23, 2014, and admits, later was immediately Delivered by Petitioner, the Original Writ document to this Supreme Court. Therefore Respondent/SCFCU said Admittance! shows Petitioner's Writ of Certiorari was timely served, and properly accepted by this Supreme Court on the date June 25, 2014, pursuant with SCACR Rule 262(a)(2)³.

2. Respondent/SCFCU's 7/8/2014 filed Motion to Dismiss & Memorandum, (see Exh. H-0), shows Respondent/SCFCU never Complied with its own! provided Rule, SCACR Rule 240(c), alleging "Petitioner's Petition for Writ of

¹ "...Rule 240(c) Form and Content of Motions and Petitions... (3) Where the Record on Appeal or Appendix has not been filed, or where the facts relied upon in support of the motion are not contained in the Record on Appeal or Appendix, the parties shall file affidavits and other documents in support of their positions.
² "...() Return to Petitioner. Within thirty (30) days after service of the petition, respondent shall serve a copy of his return on opposing counsel, and shall file with the Clerk of the Supreme Court... The return shall include an affidavit on each objection and may include a counter-statement of the case and of the questions presented for review."
³ RULE 262 FILING AND SERVICE - (a) Filing. Except for petitions for rehearing (Rule 221) and motions for reinstatement (Rule 260), all papers shall be filed by electronic means. An electronically transmitted FILED COPY of a document may be ACCEPTED for filing; however, an original of the document must be immediately sent to the clerk. Which Respondent SCFCU ADMITS! it "...RECEIVED, VIA FAX, a COPY of a DOCUMENT..." of pro se Petitioner/Whaley's FINED, Writ of Certiorari, "ADMITTED" on said above Court by...DOCUMENT...DATED JUNE 23, 2014." (See Exh. 2); As Respondent/SCFCU ADMITS! pro se Petitioner/Whaley, said SEVERAL MOTIONS to this SUPREME COURT, BEFORE the expiration date of 30 days, which these said MOTIONS were considered as PRO SE/Petitioner/Whaley "... REQUESTS to SEEK an EXTENSION of TIME; Pursuant with SCACR 240(p) which - "... This Rule governs all motions of petition filed in the appellate court, including but not limited to: motions for extension of time...; which even Respondent/SCFCU admitted in its said Motion's Memo could be ACCEPTED as an Extension of Time. Which, the Supreme Court CLERK, provided pro se Petitioner/Whaley ON the DATE! June 6, 2014 that he had UNTIL "JULY 26, 2014" to file his Writ of Certiorari, which pro se Petitioner/Whaley HAND-DELIVERED to the Supreme Court, ON the date JUNE 6, 2014. (See Exh. A), which Respondent/SCFCU ADMITS that "Petitioner...filed, on JUNE 6, 2014, a NOTICE of COURTEOUS" adding the Court and the Parties that he would be filing his Petition for a Writ of Certiorari." (See Exh. 1); THEREFORE, ALL Proper parties and this said Supreme Court was GIVEN TIMELY FAIR (Extension) NOTICE, and was always in Compliance with the SCACR rule 240(c), and SCACR rule 242(c).

Exh. 2

Certiorari as UNTIMELY. Alternatively...moves to STRIKE the APPENDIX filed by Petitioner due to extraneous INFORMATION FOUND on the DOCUMENTS INCLUDED in the filed Appendix; Whereas, Respondent/SCFCU's own provided Rule 240(c)(3) supports, Respondent/SCFCU never provided ANY required DOCUMENTATION from this Supreme Court's office, nor from Respondent/SCFCU's said Attorney(s), which could possibly support SCFCU's claims alleged in its "Argument" on pages 3, & 4, that "...The Petition for a Writ of Certiorari is UNTIMELY...On or about June 24, 2014, counsel for Respondent/SCFCU Received, VIA FAX, a copy of a Document, attached as Exhibit B...document was dated June 23, 2014..."; (See Attached Exhibits 2,3,4)

2a): As the attached above exhibit documents in number 2, shows neither of Respondent/SCFCU's provided any alleged attached DOCUMENTED EVIDENCE, NEVER showed Respondent/SCFCU received any Faxed document on the alleged date June 24, 2014; as well as Respondent/ SCFCU never provided ANY DOCUMENT from this Supreme Court, showing any date other than the written date "June 23, 2014" when this Supreme Court received its Faxed copy of pro se Petitioner/Whaley's Writ of Certiorari. Therefore shows Respondent/SCFCU never produced the required documents in order to uphold its allegations filed in its motion to dismiss. pursuant with SCACR Rule 240(c)(3).

3. Respondent/SCFCU ADMITS! pro se Petitioner/Whaley's provided EXHIBITS having also the HAND-WRITING Notes on side, Circles, Arrows...are "Correspondence and ORDERS! RELATED! to this! APPEAL...", filed under Respondent/SCFCU's 7/08/2014 Supreme Court filed Motion to Dismiss or said Alternative... (appear to be on page 1, court stamp dated July 8, 2014, [See Exh. H-0], and/or on page 5, under "I, in the Alternative, SCFCU moves to STRIKE the APPENDIX"), which Respondent/SCFCU ADMITS! this said Supreme Court, as well as the Appeals Court, and! always! filed also within the said LOWER COURT, are documents always accepted by ALL the PARTIES in the Lower Trial Court, which is pursuant with Respondent/SCFCU's own! provided RULE, 210, SCACR, when Respondent/SCFCU admits! that -

"Petitioner's 'EXHIBITS,' which this Court construed as the APPENDIX in this Matter, CONSIST of various Correspondence and ORDERS! RELATED! to this! APPEAL! Although these ARE ITEMS which MAY BE typical of an APPENDIX, Petitioner...Rather, most of the Documents have Petitioner-emphasized text by way of HANDWRITTEN NOTES, CIRCLED, and UNDERLINED Text, and ARROWS. See Exhibit D. Part 1, Petitioner's Filed Appendix. Petitioner has improperly altered these documents from their original state and his submission of such altered documents to this Court is IMPERMISSIBLE. SEE Rule 210, SCACR..." 4.

Therefore, Respondent/SCFCU's above own! admittance makes moot/and/or shows must DENY Respondent/SCFCU's Move to Strike the Appendix, pursuant with its rule 210, or any of South Carolina Appellate Court rules. 5

4 As Rule SCACR 210(c) admits that "... (c) Content. The Record on Appeal shall include all matter designated to be included by any party under Rule 208 and shall comply with the requirements of Rule 267. The Record shall not, however, include matter which was not presented to the lower court or tribunal; and

Rule 208 states that "... (a) Time to Serve and File. At the same time a party serves his initial briefs under Rule 206, to include a reply brief, he shall also serve on all parties to the appeal a Designation of Matter to be included in the Record on Appeal which shall set forth with specificity those parts of the transcript, pleadings, orders, EXHIBITS, or OTHER MATERIALS which he proposes to include in the record on appeal. One copy of this Designation with proof of service shall immediately be filed with the clerk of the appellate court."

5 Respondent/SCFCU's filed Motion to Dismiss filed in the Appellate Court (See Exh. H-2,3,4) dated February 5, 2014 under its "INTRODUCTION BACKGROUND" - ADMITS! DO NOT DENY! and/or SHOWS - in its Record and last paragraphs, that it always ACCEPTED and RELEASD upon pro se Appellant/Petitioner/Whaley's (HAND-WRITTEN NOTES, Check, Arrows, written on his ATTACHMENTS) with its Original COMPLAINT filed in the Lower Trial Court, and the SAME typed documents also within the said APPEAL COURT, shows same hand-writing, written on pro se PETITIONER/Whaley's provided CASHIER'S CHECKS, which Respondent/SCFCU's "INTRODUCTION BACKGROUND" ADMITS! Petitioner/Whaley's CASHIER'S CHECKS, and ALL his other RESIGNATION/FOUND Documents (which also have hand-written notes located on (handwritten CIRCLES, and Arrows) which shows the ACTUAL ORIGINAL written TYPED NAME Document with the Petitioner/Whaley's named PHYEE, whom Respondent/SCFCU ADMITS! is CLEARLY UNDERSTOOD that Respondent/SCFCU made OUT to the "...Entry leaves as CAPITAL CONSORTIUM GROUP...", which are the SAME exact type DOCUMENTS that were ACCEPTED within the Lower Trial Court, and the Appellate Court, in which Respondent/SCFCU either used and actually USED those said Documents as their alleged PROOF, knowing the Petitioner's own CASHIER'S CHECKS.

Although Appellate court had documents, shows neither said named RESPONDENT/SCFCU nor BOA, NEVER complied with Respondent/SCFCU's own provided South Carolina Appellate Court Rule 210(a), nor Rule 208 INVOLVING the REPLY to pro se Appellant/PETITIONER/Whaley's TIMELY filed INITIAL BRIEF, which Respondent/SCFCU had before ADMITS that...

"...The underlying action was COMMENCED on FEBRUARY 16, 2012, with APPELLANT filing a confusing COMPLAINT AGAINST BANK of AMERICA (BOA) and SOUTH CAROLINA FEDERAL CREDIT UNION (SCFCU). It alleges the allegations INCLUDED CLAIMS of Civil Conspiracy, Fraud, THEFT of MONEY, and BREACH of CONTRACT with respect to CASHIER'S CHECKS issued BY SCFCU and ENTIRELY known as CAPITAL CONSORTIUM GROUP and subsequently REPORTED into Plaintiff's ACCOUNT at BOA...the NOTICE OF APPEAL was filed in OCTOBER 2012. Due to various ISSUES with the TRANSCRIPT, and FILMS DEFICIENCIES, Appellant's purported INITIAL BRIEF was not filed until AUGUST of 2013. On October 24, 2013, BOA filed A Motion to Dismiss or in the Alternative a Motion to STRIKE those Portions of Appellant's INITIAL BRIEF and DESIGNATION of Matter to be INCLUDED in the RECORD on APPEAL."

Exh. 3

4. This Supreme Court's ORDERS in its LETTER dated "June 25, 2014", shows and/or supports pro se Petitioner/Whaley, always! complied!! with CORRECTIONS! requested by the said Court(s), when this Supreme Court also requested that - Petitioner/Whaley's "Deficiency...must be CORRECTED ...of the...accompanying PROOF OF SERVICE...in compliance with SCACR...substantially in the FORMAT shown by FORM 7 in Appendix C to part II...", which Petitioner/Whaley complied, by or before the date "June 25, 2014", OTHERWISE this Supreme Court ordered or stated that Petitioner/Whaley's filed Petition of Certiorari would have been dismissed, just as ALL! the Deficiency ORDERS requested by the said APPEALS COURT officials always! APPROVED! and ACCEPTED! All and ANY of Appellant/Petitioner/Whaley's CORRECTED Deficiencies, therefore shows that - Respondent/SCFCU's claims under its "introduction" claimed that "...Petitioner's...filed the INSTANT APPEAL in OCTOBER of 2012. There were numerous filing DEFICIENCIES and! his INITIAL BRIEF was not filed UNTIL AUGUST of 2013" ⁶, is pursuant with SCACR Rule 242(b)(2) "...Where there is a dissent in the decision of the Court of Appeals."

RESPONDENT/SCFCU's COMPLETE FILED MOTION TO DISMISS and MEMORANDUM and ALL its Supportive LAWS ONLY SUPPORTS, Respondent SCFCU's MOTION TO DISMISS must be "DECLINED" or DENIED; and SUPPORTS pro se PETITIONER/Whaley's Writ of Certiorari to be Granted, since Respondent/SCFCU's Own provided Laws CONFLICTS with this said SUPREME COURT'S prior RULINGS and LAWS (pursuant with SCACR 242(b)(3)&(5))

5. Respondent/SCFCU's July 8, 2014 filed motion to dismiss and Memorandum ADMITS that Petitioner/Whaley indeed, did TIMELY filed "...his Initial Brief was filed...(in the above said Appeals Court, timely on) AUGUST of 2013... and Designation of Matter..."; and shown by the said APPEALS COURT's ORDER/or Letter of August 23, 2013, that the APPEALS COURT ACCEPTED pro se filed "Initial Brief and Designation of Matter" as being PROPERLY FILED after! Petitioner CORRECTED any and all deficiencies requested by the Appeals Court for Petitioner to Correct. Therefore Respondent/SCFCU provided Law dated July 8, 2014, requesting this Supreme Court to DISMISS Petitioner/Whaley's APPEAL, by repeated! the APPEALS Court's provided Law "Henning v. Kaye...415 S.E. 2d 794 (1992)" that was entered in the Appeals Court's ORDER 2/27/2014, and (allegedly) supported by the Appeals Court's FINAL ORDER on 5/22/2014, shows the Appeals Court & Respondent's provided Law - "Henning v. Kaye...415 S.E. 2d 794 (1992)" is pursuant with SCACR Rule 242(b)(3) "...Where the decision of the Court of Appeals is in CONFLICT with a prior decision of the Supreme Court..." - WHEN this Supreme Court Henning V. Kaye -- DECLINED! or DENIED! to Grant that said Respondent(s) MOTION to DISMISS -- which indeed CONFLICTS! with Respondent/SCFCU and! the Appeals Court that Granted Respondent's MOTION to DISMISS 2/27/14 was pursuant with their ONLY! above case LAW "Henning v. Kaye...".

6. Respondent/SCFCU's July 8, 2014 MOTION to DISMISS and Memo's written "Introduction" and "Argument" also rely! upon the Appeals Court's provided LAW "Henning v. Kay, 307 S.C. 436, 415 S.E. 2d 794 (1992)" which is a LAW shown to be ONLY in FAVOR of pro se Petitioner/Whaley's Appeals MUST NOT be DISMISSED, pursuant with this Supreme

⁶ Petitioner's attached Exhibits, As, AAA, AAA-1, shows, and ADMITS in Respondent/SCFCU's LETTERS dated "September 16, 2013", and "OCTOBER 22, 2013", "Admitted by SCFCU WITHOUT ANY SUPPORTIVE LAWS and ANY Supportive S.C. Appellate Court, that could possibly support SCFCU's Letter on Sept. 16, 2013 stating that "...Mr. Whaley, pro se Appellant, FILED and SERVED his REQUESTION of WRIT on what appears to be SEPTEMBER 4, 2013; therefore pursuant to THE (Appellate) COURT'S AUGUST 23, 2013 LETTER, OURS (Initial) RECOMMENDATION, Brief and MEMORANDUM ARE CURRENTLY IN ORDER BY 5:00 PM, OCTOBER 3, 2013. However, with a 30-day EXTENSION of time, but ONLY "which showed ONLY ONE! INDIVIDUAL CONSIDERATION, OUR INITIAL BRIEF and DESIGNATIONS were in ORDER on or BEFORE November 4, 2013". Just as SCFCU provided ABSOLUTELY NO SUPPORTIVE LAW nor any Appellate Court Rule to support the TIME in which SCFCU ADMITS that "...Subsequent (meaning, FOLLOWING) our LATTER! to PETITIONER'S (pro se Whaley's) FILING of his INITIAL BRIEF, RESPONDENT/SCFCU or Bank of America filed a MOTION TO DISMISS..." which SCFCU Letter of "OCT. 22, 2013" (and shows was not) ONLY UNTIMELY filed, and SCFCU's LETTER dated "OCTOBER 22, 2013" ADMITS that "...Respondent South Carolina Federal Credit Union is in receipt of Mr. Whaley's LETTER to the COURT which REQUESTED that JUDGMENTS against RESPONDENT BANK of AMERICA be reversed (and) that said RESPONDENT MATTER be sent to Lower Trial Court for DISPOSITION, IN ORDER DIRECT JUDGMENT IN FAVOR of PLAINTIFF Respondent Bank of America, Pursuant with SCACR Rule 242(b)(3) AND... A APPEALS-MOTION is DIRECTED at ANOTHER PARTY. HOWEVER, in the Court Mr. Whaley INTENDED the Motion be DIRECTED towards Respondent South Carolina Federal Credit Union, please ACCEPT the LETTER as OUR BRIEF RETURN to the MOTION. THIS MOTION is most PROBABLY against RESPONDENT South Carolina Federal Credit Union. Respondent South Carolina Federal Credit Union ADVISE this honorable COURT for an EXTENSION of TIME in which to FILE said INITIAL BRIEF. This Court GRANTED the MOTION by ORDER filed September 27, 2013. ACCORDINGLY Respondent SOUTH CAROLINA FEDERAL CREDIT UNION MUST FILE said MOTION UNTIL November 4, 2013 -- 13 DAYS from TODAY."

As Respondent/SCFCU's September 10, 2013, LETTER shows Respondent/SCFCU is the ONLY! (licensed) Attorney for (and) (banker) Respondent/Party in the APPEALS COURT! that REQUESTED an EXTENSION of TIME, (and SCFCU 9/10/13 letter shows Respondent/BANK OF AMERICA NEVER Requested an EXTENSION, nor FILED any kind of NOTICE of INTENT) just a pro se Petitioner/Whaley's attempt to file document dated 9/10/2013, shows that that document! NOT Requested ANY REQUIRED! RULE nor ANY LAW! under which SCFCU's requested to extend! EXTENSION; but in accordance with Rule 242(b)(3) states: (4) "... This Rule governs all motions or petitions filed in the appellate court, including but not limited to: motions for extension of time... and... (5) Unless otherwise provided by these Rules, or ordered by the appellate court, the time limits imposed by these Rules SHALL NOT BE STAYED by the FILING of a MOTION or petition." - DEFEATS SCFCU's "introduction" claims that "Subsequent to Petitioner's FILING of his Initial Brief, Respondent BOA (Bank of America) FILED a MOTION to DISMISS, or, in the ALTERNATIVE, a MOTION to Strike Petitioner's INITIAL BRIEF, and DESIGNATION OF MATTER..."

Exh. 4

Court's prior decisions, pursuant with SCACR 242(b)(2)&(3); which now on 7/8/14, the said Respondent/SCFCU has provided this said SUPREME COURT with a NEW case LAW "Cf. Elam v. South Carolina Dept. of Transp., 361 S.C. 9, 602 S.E. 2d 772 (2004), which again! contradicts! or shows that! said cas LAW "Cf. Elam v. S.C. Dept of Transp..." also! FAVORS! the pro se Petitioner/Whaley, when this SUPREME COURT RULED! and admits! that "...We granted the petition for a writ of certiorari to review the Court of Appeals' unpublished order dismissing the appeal of the South Carolina Department of Transportation (SCDOT) as untimely. *Elam v. South Carolina Dept of Transp.*, S.C. Ct.App. Order dated July 26, 2002. We reverse"; - which makes the Appeals Case pursuant with SCACR Rule 242(b)(3), which CONFLICTS! with a PRIOR RULING of this said Supreme Court's DISCUSSION.

(6a): Respondent/SCFCU's filed requests in their 07/08/2014 motion and memorandum, shows " _ Where the decision of the Court of APPEALS is in CONFLICTS with a PRIOR DECISION of the SUPREME COURT- decided by this Supreme Court of South Carolina. Heard November 19, 2003. Decided September 13, 2004. in ELAM v. SOUTH CAROLINA DEPT. of TRANSP. NO. 200309. 361 S.C. 9 (2004), 602 S.E.2d 772; Hattie Rose ELAM, Respondent, v. SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION, Petitioner, whereas makes Respondent/SCFCU's alleged DEADLINE Claims another moot! and Conflicting claims by SCFCU, whose Motion to Dismiss must be denied! or "Declined". SEE "Rule 242(b), SCACR" - 7

Respondent/SCFCU ADMITS! THIS SUPREME COURT "constructed" for READ AS the APPENDIX in THIS MATTER - CONSIST of various CORRESPONDENCE and ORDERS! RELATED! TO! this APPEAL; which RESPONDENT/SCFCU's 07/08/2014 "Introduction" FOOTNOTE 1 SHOWS -Where substantial constitutional issues are directly involved; AND Where a federal question is included and the decision of the Court of Appeals conflicts with a decision of the United States Supreme Court; involving also as FEDERAL RECEIVER Mr. Beattie B. Ashmore who is also! EMPLOYED! or receives Benefits with THIS SUPREME COURT BOARD - Pursuant with 28 USC 958 (see Exh. C); and Conflicts with the STATE! COURT! LAW reference a Appointed RECEIVER-Law Firm of Nelson, Mullin, Riley & Scarborough, LLP

7. Respondent/SCFCU's 7/8/2014 motion to dismiss memorandum, on page 5, under its "In the Alternative, SCFCU moves to strike the Appendix", ADMITS that "Petitioner's 'EXHIBITS' in its Appendix in this matter, CONSIST of various Correspondence and Orders RELATED! to! this! APPEAL" Petitioner/Whaley provided the SAME attached documents given to this Supreme and Appeals Court -is! not! denied!! by Respondent/SCFCU! was given to the Appeals Court, provided with Appellant/Petitioner's filed along! with! the Lower Court's TRANSCRIPT(s), and other Documented EVIDENCE, that always SUPPORTED, Petitioner's SAME documents with all said handwritten notes-written, was also provided to the Lower Trial Court, which make ALL THOSE SAME said Documents Admissible in this SUPREME COUR, as well within the said APPEAL COURT, involving the APPEALS COURT'S (alleged Final) ORDERS (which RESPONDENT/SCFCU admits the Court GRANTED both RESPONDENTS Motion to Dismiss involving the APPEAL Court) dated 5/22/2014 AND 02/27/2014, although! NEITHER! said named RESPONDENTS! NEVER! Objected! to absolutely! any! of the said HAND-WRITTEN NOTES, or Circles, and Arrows made on the SAME documents that were filed within the lower Trial Court, involving Petitioner's Cashier's Checks named PAYEE, whom Respondent/SCFCU admits it made out Petitioner's cashier's checks to the Entity Capital Consortium Group. *

⁷ SCACR 242(b) Considerations Governing Review. A writ of certiorari is not a matter of right granted only where there are special and important reasons. ...which will be considered:
(2) Where there is a dissent in the decision of the Court of Appeals.
(3) Where the decision of the Court of Appeals is in conflict with a prior decision of the Supreme Court.
⁸ Respondent/SCFCU has actually used the said WRITTEN DOCUMENTS as SCFCU's alleged documented EVIDENCE, as to allegedly support its allegations involving PETITIONER/WHALEY'S provided CASHIER'S CHECKS, named PAYEE/COG, whom BOTH Respondent/SCFCU's Motion to Dismiss filed in the SUPREME COURT dated 7/8/2014, page 2 "Introduction" FOOTNOTE 1, ALLEGED that "...the trial Judge's ORDER re RESPONDENT'S Motion to Dismiss, PETITIONER'S claims RELATED to CONTRIBUTIONS be MADE Via CASHIER'S CHECKS in Capital Consortium, an ENTITY CONTROLLED BY INDIVIDUALS (Fough, McQueen, Giroux-written in Respondent's pleadings and in LOWER TRIAL COURT'S TRANSCRIPTS) collectively REFERRED to as the "THREE HEBREW BOYS". In DECEMBER of 2010, the "THREE HEBREW BOYS" were CONVICTED! for THEIR INVOLVEMENT in an alleged PONZI SCHEME involving the CONTRIBUTIONS to CAPITAL CONSORTIUM and Capital Shared ENTITIES - involving a FEDERAL! COURT! said case matters that's interfering! with! the! ON! GOING! STATE! COURT! CASE MATTER(s), which RESPONDENT/SCFCU and the APPEAL COURT - said claims and decision! or request involves "...Where a federal question is included and the decision of the Court of Appeals conflicts with a decision of the United States Supreme Court." pursuant with SCACR Rule 242(b)(5);

Exh. 5

8. Respondent/SCFCU's said Motion to Dismiss/Memorandum 07/08/2014, under its Footnote 1, makes its claims, (WITHOUT! Respondent/SCFCU Never! PRODUCED!! absolutely NO! SUPPORTIVE DOCUMENTS), which Respondent/SCFCU'S own said Motion & Memo, says is required pursuant with SCACR Rule 240(c) or 240(c)(3), which SCFCU's claims involve the Appeal Court's DECISIONS of 5/22/2014 and 2/27/2014, that involves a Question in this said matter, Pursuant with SCACR Rule 242(b)(4), Where substantial constitutional issues are directly involved, (pursuant also with SCACR Rule 242 (b)(2)(3)&(5), INVOLVING Respondent/SCFCU's 7/8/2014 FOOTNOTE 1 claims and allegations involving Petitioner/Whaley's -

"...Via Cashier's Check, to CAPITAL CONSORTIUM, and ENTITY Controlled (allegedly) by INDIVIDUALS (Pough, McQueen, Brunson, See Lower Trial Court Transcript, regarding Federal Law issueal brought by Respondents in this State Court Laws hearing matters held, May, 2012) Colloquially referred to as the 'THREE HEBREW BOYS'. In December of 2010, the 'THREE HEBREW BOYS' were CONVICTED as to for their INVOLVEMENT in an alleged! PONZI SCHEME. *Yakka* which Petitioner's Original COMPLAINT/and filed in the Appeals Court, always! claimed "Conspiracy of 'THEFT!! of Money Funds"-

"(which involves ONLY! Respondent[s]) who JOINT! ADDED! PARTY (the alleged! Federal RECEIVER, Mr. Beattie B. Ashmore, who is also!! a MEMBER! on the BOARD!! of this said SUPREME COURT) whom RESPONDENT(S)/SCFCU's JOINT a FEDERAL!! Case Law Matters! with [a Prior Closed! STATE! COURT! Case Law MATTER] and this! present! ONGOING STATE! COURT! Case Law MATTER! that the said FEDERAL COURT Case said Laws interferes with this said ONGOING!! STATE! Court CASE Laws and Rules, which involves "...Where substantial constitutional issues are directly involved; AND Where a federal question is included and the decision of the Court of Appeals conflicts with a decision of the United States Supreme Court..."; pursuant with SCACR Rule 242(b)(4)&(5);

9. Respondent/SCFCU's 07/08/2014, Supreme Court filed Motion to Dismiss and Memorandum, under its footnote 1, makes allegations involving another! Court CASE MATTER, involving the said Respondent/SCFCU and the S.C. APPEAL Court's granted Orders of 5/22/2014 and 2/27/2014, ordered pursuant ONLY!! with a SUPREME STATE! Court Case LAW "Henning v. Kay, 307 S.C. 438, 415 S.E. 2d 794 (1992)", which RULED in FAVOR of pro se Petitioner/Whaley, as to this Supreme Court's ORDERED the RESPONDENT's Motion to Dismiss (and memo) to be "DECLINED"/or DENIED. Which is pursuant with SCACR Rule 242 (b)(2)(3)&(5)

10. Respondent/SCFCU's 07/08/2014, Supreme Court filed Motion to Dismiss and Memorandum, under its footnote 1 makes allegations involving another Court Case matter, which Respondent/SCFCU alleged involves Petitioner/Whaley's filing of his Writ of Certiorari to be allegedly! UNTIMELY, which Respondent/SCFCU provided another SUPREME State! Court Case Law... "ELAM v. SOUTH CAROLINA DEPT. OF TRANSP. ... 361 S.C. 9 (2004), 602 S.E.2d 772", which Ruled ALSO in FAVOR of pro se Petitioner/Whaley, when Elam v. S.C. of Trans, ruled that "... We granted the petition for a writ of certiorari to review the Court of Appeals' unpublished order dismissing the appeal of the South Carolina Department of Transportation (SCDOT) as untimely. *Elam v. South Carolina Dept of Transp., S.C. Cl.App. Order dated July 25, 2002. We reverse!!*. Which is pursuant with SCACR Rule 242 (b)(2)(3)&(5)

WHEREFORE, in Conclusion of Respondent/SCFCU's request to this said Supreme Court, have requested matters that "... the decision of the Court of Appeals is in CONFLICTS with a PRIOR DECISION of this SUPREME Court". Furthermore, shows that Respondent/SCFCU's motion to dismiss and its memorandum in support must be "DECLINED"/or Denied, and therefore shows this honorable Supreme Court must Grant pro se Petitioner/Whaley's Petition for Writ of Certiorari, by upholding this Supreme Court's prior said Ordered decisions involving the LAWS provided by the said named Respondent/SCFCU, which all said LAWS were indeed in FAVOR of the pro se Petitioner/Whaley, involving also the Appeals Court's ordered decisions of May 22, 2014 involving its order of 2/27/2017, must be overruled, and REVERSE/and or remand this said very serious, case matter to be heard within whatever proper Court(s).

Dated July 18, 2014

5/1
 Roger L. Whaley, Pro Se
 8673 Laurel Grove Lane
 North Charleston, South Carolina, 29420

Exh. 6

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEALING the South Carolina's APPEAL COURT
Appellate Case no. 2012-213208

APPEAL of Dorchester County Circuit Trial
Court of Common Pleas
Master of Equity/serving as Circuit - Judge Malte D. Murphy

Roger L. WhaleyPetitioner

vs.

South Carolina Federal Credit Union and Bank of America.....Respondents.

CERTIFICATE OF SERVICE

I, declare, that I, Roger L. Whaley, hand-delivered, mailed, and/or faxed his said Response/Reply ONLY to Respondent/SCFCU's filed motion to dismiss and Memorandum in Support, whose Legal Counselor's Law Firm, is Richardson, Plowden, Robinson, P.A., as the Appeals Court rulings nor any lower trial court's rulings, NEVER CONSOLIDATED nor JOINT the said DEFENDANTS (SCFCU & Bank of America). Therefore only SCFCU's provided its Motion to Dismiss and Memorandum, which NEVER COMPLIED with the required Rule pursuant with SCACR RULE 242(f) ¹, regarding Respondent/SCFCU's motion & memo that was NEVER upheld with SCFCU's own provided Laws Herring v. Keys...415 S.E.2d 794 (1992) nor Cf. Elam v. South Carolina Dept. of Transp., 361 S.C. 9, 602 S.E.2d 772 (2004).

Date: July 18, 2014

S//
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¹ "(f) Within 30 days after service of the petition, respondent shall serve a copy of his return on opposing counsel, and shall file with the Clerk of the Supreme Court one original and six (6) copies of his return and proof of service showing that the return has been served. The return SHALL INCLUDE an Argument ON EACH QUESTION and may include a counter-statement of the case and of the questions presented for review."

WHEREAS, and posted facts are, that Respondent/SCFCU's COMPLETE "ARGUMENT" addresses absolutely NONE of Petitioner/Whaley's provided "...questions presented for review..." which appear (just as in the Appeals Court, and within the Lower Trial Court) Respondent/SCFCU Only raised up/ filed out/ ADDED Claims, in which the Plaintiff/Appellant/Petitioner/Whaley - NEVER claimed in his COMPLAINT regarding any alleged Criminal claims involving an alleged FEDERAL, Postal Scheme, involving the alleged BUSINESS/ADDED PARTIES 3-Harbor Boys, whom RESPONDENT/SCFCU continued make said ADDED CLAIMS, JUST AS RESPONDENT/SCFCU's Motion to Dismiss - said Motion - has not ADDRESS/REPLY/ DENIED/NEW ARGUMENT, absolutely ANY of Petitioner/Whaley's provided Questions and Arguments written in Petitioner's Will of Carolina. As Respondent/SCFCU's said motion and memo only address the alleged finalities of Petitioner's already filed and accepted Will of Carolina, which this said Supreme Court accepted & filed in this Supreme Court ONLY after Petitioner/Whaley filed into this Supreme Court's REQUESTED CORRECTIONS, which was corrected and also filed within this said Supreme Court.

Exh. 7

IN THE STATE OF SOUTH CAROLINA
In The Supreme Court
Case no: 2014-001371

APPEALING the South Carolina's APPEAL COURT
Appellate Case no. 2012-213208

APPEAL of Dorchester County Circuit Trial
Court of Common Pleas
Master of Equity/serving as Circuit - Judge Maite D. Murphy
Case no: 2012-CP-18000539

Roger L. WhaleyPetitioner
vs.
South Carolina Federal Credit Union and Bank of America.....Respondents.

PETITIONER/WHALEY'S AMENDMENT TO the RETURN/OR RESPONSE to
SOUTH CAROLINA FEDERAL CREDIT UNION's
MEMORANDUM of LAW IN SUPPORT of

Motion to Dismiss or, In the Alternative, Motion to Strike
Appendix on Behalf of **RESPONDENT SOUTH CAROLINA FEDERAL CREDIT UNION/axed & mailed 7/18/14**
SHOWING CORRECTION NOTICES - under FOOTNOTE 3, and
CORRECT of SUPREME COURT No: 2014-001371/Erred no. 2014-000067
and placing the CORRECTION DATE to JULY 19, 2014 (Erred written June 19, 2014)
are **CORRECTIONS ON - Petitioner/Whaley's RESPONSE/or RETURN to Only Respondent/SCFCU 7/8/14 Pleadings**

COMES NOW, the pro se Petitioner/Whaley, bring to the attention of all parties and to this said Supreme Court, making known, Petitioner's above said Amendment, to fully incorporate the CORRECTION involving Footnote 3 of Petitioner's Response/or RETURN to SCFCU's Memo and Support its Motion to Dismiss, or said Alternative, when Petitioner/Whaley, wrote in error that...

"...Which, this Supreme Court CLERK, provided pro se Petitioner/Whaley ON the DATE June 5, 2014 that he had UNTIL "July 25, 2014" to file his Writ of Certiorari...; should read the said Supreme Court Clerk told Petitioner/Whaley on JUNE 5, 2014 " he had UNTIL "JUNE 25, 2014"

Therefore, Petitioner/Whaley further incorporates the Correction, and/or amendment also SUPREME COURT No: 2014-001371/m erred written 2014-000067; as well as, placing the CORRECT DATE of JULY 19, 2014 (in erred written June 19, 2014), regarding this said Amendment of said CORRECTIONS are being filed so to incorporate the first Faxed/and/or mailed Corrections provided to ALL PARTIES, mailed to this said Supreme Court since 7/18/2014, of Petitioner/Whaley's filed "...Response/or Reply to Respondent/South Carolina Federal Credit Union's Memorandum of Law in Support of Motion to Dismiss, or, in the Alternative, Motion to Strike Appendix...", whereas, this said AMENDMENT of these said NOTICE of CORRECTIONS will not prejudice any said party or this said Supreme Court.

CERTIFICATE OF SERVICES

I declare that all proper parties, has been Faxed, mailed or Hand-Delivered, and (5 copies to) this Supreme Court, of this said Amendment to RETURN/or CORRECTIONS to South Carolina Federal Credit Union's Memorandum of Law in Support of Motion to Dismiss, or, In the Alternative, Motion to Strike Appendix:

Dated: July 25, 2014

cc: Tara C. Sullivan, Esquire
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Columbia, S.C. 29211

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Respectfully submitted,
5
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