

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM SUMTER COUNTY

Richard L. Booth, Master in Equity

Case No. 2012-CP-43-1060

Appellate Case No. 2014-001016

Wells Fargo Bank, N.A. Respondent

V.

Henrietta Rouse; Park West Homeowners Association, Inc. Defendants

Of Whom Henrietta Rouse is the Appellant.

Jason D. Wyman (SC Bar # 100271)
Rogers Townsend & Thomas, PC
220 Executive Center Drive
Suite 109
Columbia, SC 29210
(803) 744-5303 – Telephone

Wells Fargo Bank, N.A.
Executive Offices
Attn: Mr. Stumpf
P. O. Box 637110
San Francisco, California 94163

CORRECTED COPY OF INITIAL BRIEF

For the claim is I am appealing the Orders denying my Motions. For with this knowledge my Motion was denied because I failed to appear, for the claim is I did contact the Court via Fax on April 2, 2014, giving - -notice - - that I would not be able to attend the hearing. As a homeowner it is my right to be able to defend for my property by allowing me to have my Motions heard, especially when I did inform the Clerk of Court that I was not going to be able to come on April 3, 2014. I am also appealing the Order for WRIT OF POSSESSION (which was signed February 5, 2014, but was not schedule to be heard until April 3, 2014 and it was not filed into the Court until April 3, 2014) because it was suppose to have been heard on the same date of my Motions.

1. Motion for Acceptance (which included Claims Reduce to Summary Judgment, Notice of Settlement)
2. Motion for Objection of Sale

For the claim is in my Motion for Acceptance there was a section that dealt with my Perfected Security Interest which I believe to be the most important section for the Motion for Acceptance. Under the – Uniform – Commercial – Code – Revised Article 9 section 203(b)

indicates that my Perfected Security Interest trumps any creditor lien or judgment of a court. For the claim is I have been the caretaker (maintenance, upkeep, guardian) of 235 Keels Road, Sumter SC 29154, for over six years. For the claim is my Interest arised as soon as I took possession of the collateral (property). For under the law is a claim of the minimum of \$8 an hour, 24 hours per day, 365 days a year, which is a minumum of \$87,000 per year times the number of years that I have been living at this location, in which I have been living more than six years (522,000.00). For the claim is my Perfecred Security Interest outweighs the Interest of Wells Fargo Bank and the investor who is benefiting from my transaction, and it can not be denied under any law.

For the claim is my Perfect Sercuity Interest takes presedent over the judgment that has been granted to Wells Fargo Bank by the lower court.

Henrietta Rouse

Autograph

Every Right Preserved

c/o 235 Keels Road

Sumter, South Carolina 29154

(803)607-9338

8/6/2014

Date

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM SUMTER COUNTY

Richard L. Booth, Master in Equity

Case No. 2012-CP-43-1060

Appellate Case No. 2014-001016

Wells Fargo Bank, N.A. Respondent

V.

Henrietta Rouse; Park West Homeowners Association, Inc. Defendants

Of Whom Henrietta Rouse is the Appellant.

**CERTIFICATE OF MAILING
PROOF OF SERVICE**

I hereby certify that I forwarded by Certified Mail a copy of the **CORRECTED COPY OF INITIAL BRIEF** to the following location(s) on this 7 day of August, in the year of 2014:

Jason D. Wyman (SC Bar # 100271)
Rogers Townsend & Thomas, PC
220 Executive Center Drive
Suite 109
Columbia, SC 29210
(803) 744-5303 – Telephone
[ATTORNEY FOR THE RESPONDENT]

Wells Fargo Bank, N.A.
Executive Offices
Attn: Mr. Stumpf
P. O. Box 637110
San Francisco, California 94163

Henrietta Rouse
Autograph
Every Right Preserved
c/o 235 Keels Road
Sumter, South Carolina 29154
(803)607-9338

8/6/2014
Date

RECEIVED

AUG 07 2014

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM SUMTER COUNTY

Richard L. Booth, Master in Equity

Case No. 2012-CP-43-1060

Appellate Case No. 2014-001016

Wells Fargo Bank, N.A. Respondent

V.

Henrietta Rouse; Park West Homeowners Association, Inc. Defendants

Of Whom Henrietta Rouse is the Appellant.

Jason D. Wyman (SC Bar # 100271)
Rogers Townsend & Thomas, PC
220 Executive Center Drive
Suite 109
Columbia, SC 29210
(803) 744-5303 – Telephone

Wells Fargo Bank, N.A.
Executive Offices
Attn: Mr. Stumpf
P. O. Box 637110
San Francisco, California 94163

NOTICE OF CORRECTION

For the claim is this letter is to inform you of the corrections made on the Corrected Copy of Initial Brief. For the claim is according to SCACR the caption/title did not comply with Rule 267(a) and must be corrected. For with the knowledge the claim is the caption/title has been changed to the correct caption/title. For with this knowledge thank you for your time.

Henrietta Rouse

Autograph

Every Right Preserved

c/o 235 Keels Road

Sumter, South Carolina 29154

(803)607-9338

8/6/2014
Date

RECEIVED

AUG 07 2014

SC Court of Appeals