

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY

Court of Common Pleas

Gordon G. Cooper, Master in Equity

Case No. 2012-CP-42-3027; Appellate Case: 2014-000600

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE FOR ARGENT SECURITIES INC.,
ASSET-BACKED PASS-THROUGH CERTIFICATES,
SERIES 2004-W11,

RESPONDENT

v.

Geary Thomas Dooly, Eleanor S. Dooly,
United State of America, Defendants

Of whom Geary Thomas Dooly is the Appellant

APPELLANT

APPELLANT'S "Certificate of Counsel as to Contents of Record On Appeal"

Appellant does hereby certify that, according to the best of my comprehension, the Record On Appeal does include all materials proposed to be included by any of the parties and not any other material with the following two (2) exceptions:

1. Appellant added the Record On Appeal the Document APPELLANT'S INITIAL REPLY BRIEF (R. pp. 366-373) (Note that: these pages were inadvertently not included in the index) after writing a letter to the Court AND the Respondent on August 28, 2014 stating that it seemed appropriate that this should be included and asking for the Court AND Respondent's approval. Appellant received no

PAGE 1 OF 3

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OCT 06 2014

SC Court of Appeals

correspondence from either until after September 29, 2014 wherein Respondent objected to the inclusion. This untimely response was past (15 DAYS) the date wherein the Appellant was required to file the 15 or so bound copies to the Court.

Appellant does NOT object to these pages being NOT included in the Court's review, and to them NOT being included as part of the Record On Appeal. It was impossible to "not include" due the untimely response.

2. Respondent filed a Motion to the Appellate Court dated September 22, 2014 requesting to include a document dated August 1, 2013 titled PLAINTIFF'S MOTION TO DISMISS COUNTERCLAIMS AND FOR ORDER OF REFERENCE TO MASTER-IN-EQUITY. During the course of this case Respondent had filed two (2) identically titled documents by the title above. One document was filed on January 25, 2013 (See R. pp. 196-207) and the other by the same title filed on August 1, 2013. Appellant inadvertently included the January 25, 2013 dated document going by title, but failed to note, at that time, that there were two (2) so entitled documents, THEREFORE, Appellant agrees that Respondent may include the August 1, 2013 dated document. AGAIN, the same Record On Appeal was provided to Respondent well in advance of the required date for Appellant to supply the 15 or so bound copies, however Respondent failed to review that supplied Record On Appeal and make any objections until the late date of September 22, 2013, approximately 10 days after the deadline for Appellant to send the bound copies to the Court, thus there was no way to make any requested changes in the bound copies.

Date: October 3, 2014

Geary-Thomas: Dooly
c/o P.O.Box 3326
Spartanburg, South Carolina 29304

Geary-Thomas: Dooly, MD

CERTIFICATE OF SERVICE

I, Geary-Thomas: Dooly, hereby certify that a copy of the following document(s) has been mailed on or before this date via USPS with proper postage to each party listed:

DOCUMENT(S)

1. APPELLANT'S "Certificate of Counsel as to Contents of Record On Appeal"

PARTY(IES)

Nelson, Mullins, Riley, & Scarborough, LLP
Attn: Sarah R. Anderson (SC Bar # 100007)
Giles M. Schanen (SC Bar # 70391)
P.O.Box 10084
Greenville, South Carolina 29603-0084

Date: October 3, 2014

Geary-Thomas: Dooly
c/o P.O.Box 3326
Spartanburg, South Carolina 29304

Geary-Thomas: Dooly, ARD

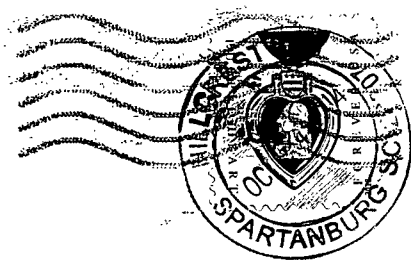
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Mary - Thomas Pugh
c/o P.O. Box 3326
Spartanburg, South Carolina
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