

APPEAL FROM THE CHARLESTON COUNTY
MASTER IN EQUITY COURT
HONORABLE JUDGE MIKELL R. SCARBOROUGH

Case No. 2006-CP-10-2859

Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as Trustee of
Ameriquest Mortgages Securities, Inc. Asset Backed Passed
Through Certificates, Series 2005-R4CGM under the Pooling
And Serving Agreement dated as May 01, 2005, without recourse,

Respondent,

v.

Pandora M. Huggins-Edwards a/k/a Pandora H. Edwards; Sylvia Anne Lawrence
a/k/a Sylviatte Anne Lawrence; Glenn Huggins; Micheal Huggins; Donnell Huggins;
Samuel Huggins; Ira S. Huggins; Derwin Huggins; Andrean Huggins Cotton a/k/a
Adrienne Huggins Cotton; Sharon H. Smack; Dewayne Dixon; Kimberly Nelms;
Timothy Nelms; Jennifer Nelms; Michael A. Brown; Demetrius Huggins Nelms; a
minor, Darius Simmons; a minor, Dondre Simmons; a minor; Reginald Huggins;
Joseph Huggins; Heather Huggins; Barbara Huggins; any other Heirs-at-Law or
Devises of Rickey Henry Huggins, Deceased their heirs, Personal
Representatives, Administrators, Successors and Assigns, and all other persons
entitled to claim through them; any other Heirs-at-Law or Devises of Henry Buster
Huggins, Jr., Deceased, their heirs, Personal Representatives, Administrators,
Successors and Assigns, and all other persons entitled to claim through them; any
other Heirs-at- Law or Devises of Michelle Huggins; Deceased, theirs heirs,
Personal Representatives, Administrators, Successors and Assigns, and all other
persons entitled to claim through them; any other Heirs-at-Law or Devises of
Buster Huggins Sr., Deceased, theirs heirs, Personal Representative,
Administrators, Successors and assigns, and all other persons entitled to claim
through them; all unknown persons with any right, title or interest in the real estate
described herein; who may be in the military service of the United States of
America, being a class designated as John Doe; and any unknown minors or
persons disability being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor Credit Company; General
Motors Acceptance Corporation; White Directory Holding Carolina, Inc. d/b/a The
Talking Phone Book; Monogram Credit Card Bank of Georgia; Michael Twitty;
Deborah Twitty; The United States of America, by and through its agency, The
Internal Revenue Service; and John C. Bigler..... Defendants,

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FEB 28 2014

SC Court of Appeals

Of Whom Pandora M. Huggins-Edwards a/k/a Pandora H. Edwards _____Appellant.

Appellants Reply to
Respondent' Motion to Dismiss
The Appeal

Pandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, S. C. 29407
(843) 801-7392
Appellant-Pro Se

Rogers Townsend & Thomas, PC
220 Executive Center Drive
Columbia, S. C. 29210
Respondent Attorney,
Sean M. Foerster, (SC Bar #
77644)
(803) 771-7900

February 26, 2014

The appellant respectfully submits this Reply to the Respondent Motion To dismiss The Appeal.

That the South Carolina Court of Appeal to my understanding of its Order did not specifically Order that the Appellant file a second Amend Designation of Matter in its Order filed December 13, 2013.

That the South Carolina Court of Appeal did not specifically Order that the Appellant remove the brief in the Second Amended Record on Appeal. The brief is the Appellant right to freedom of speech. In brief it clearly points out and support the Appellant claims of poor defense.

That the Appellant is not an attorney. At first the appellant made some circuital errors. This Court Order on December 13, 2013 the Appellant to correct the circuital errors and The appellant made the correction as was Order by this Court.

That the Respondent attorney is continuing to knit pick at the minor error for grounds for dismissal of this action. The Respondent has more legally knowledge on how to get around this action claiming the minor errors. What about the Contents in this action?

The fact is if this court compare the first Record on Appeal to the Second Amended Record on Appeal I will clearly demonstrates that I complied to the Court Order to the best of my understanding and to the best of ability. For the record I would like for this court to take note to the fact that the Appellant did go through each of the Record on Appeal and clean up the handwriting by whiting them out in all 16 Copies.

That the fact is the Appellant do not have the finicincial resource and the legal team as the Respondent and the Respondent's Attorney. It is clear to the Appellant that Respondent's Attorney strategy is to wear the Appellant down first financially, mentally

Physically in hopes that the Appellant will give up on this action.

That the Appellant Pandora M. Huggins-Edwards is a retired Disable Veteran with 22 years of services in the U. S. Army. The Appellant is a fix income. Therefore my Financial situation is surly not the same as the Respondent and it's Attorney.

That the Appellant Pandora M. Huggins-Edwards is a "victim" of predatory lending. this foreclosure action 06/2859 began on August of 2006 six years later the Respondent Attorney received a judgment from the lower courts this alone should have up red flags to the lower courts.

That the Respondent Attorney is rejecting that Attorney and Cost of 83,000.00 Instrument not be included in the Record of Appeal. The underlying fact is the Respondent Attorney had no problem introducing this document at the trail hearing To the lower court in order for the \$83,000.00 included in the Final Judgment Order. The Respondent Attorney is now rejecting that this instrument be omitted from the Record of Appeal. This is the appellant grounds for appeal. The appellant pleas defense of Fraud.

That the Appellant is confused by the Respondent Attorney request as to if the Instruments listed below are documents that should have been place in its designation Of matter, are be included in the Appellant designation of matter are remove it From this action.

. Complaint filed on July 24, 2006

. First Amended Lis Pendens, & Complaint filed on September 10, 2008

The underlying fact is to the appellant understanding these documents are essential in this action due to the fact that the Respondent Attorney filed these instruments in Charleston County Master in Equity Court in order to start the initial foreclosure action. The appellant defense as fraud in this action.

With all due respect to this Court the Respondent Attorney Exhibits 1 thru 7 is clearly Demonstrating that the Respondent Attorney is requesting that this court justify its Action and its order on December 13, 2013. The Respondent Attorney is forcing this Court to dismiss its action base on the Respondent attorney view of the Laws and Rule in the Respondent's favor. Surly this Court need no reminders of its past decisions And quick judgment to rule for dismissal without clearly looking at the facts in this Action.

The Appellant would to inform this court of the fact that John C. Bigler Has sold the extension of the foreclosure property. The new owner of the house is Starting to remodel, the new owner clearly stated that this court has already made a Decision in the South Carolina Court of Appeal.

That Appellant understanding of the Order December 17, 2013 the Final Brief was to be Corrected and filed in the 30days as ordered.

That the South Carolina Court of Appeal Order that Deutsche Bank respectfully file It Final Brief as soon as possible.

Respectfully submitted



Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, South Carolina 29407
(843) 801-7392
Appellant Pro SE

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY

MASTER IN EQUITY COURT

HONORABLE JUDGE MIKELL R. SCARBOROUGH

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Representatives, Administrators, Successors and Assigns, and all other persons
entitled to claim through them; any other Heirs-at-Law or Devises of Henry Buster
Huggins, Jr., Deceased, their heirs, Personal Representatives, Administrators,
Successors and Assigns, and all other persons entitled to claim through them; any
other Heirs-at- Law or Devises of Michelle Huggins; Deceased, theirs heirs,
Personal Representatives, Administrators, Successors and Assigns, and all other
persons entitled to claim through them; any other Heirs-at-Law or Devises of
Buster Huggins Sr., Deceased, theirs heirs, Personal Representative,
Administrators, Successors and assigns, and all other persons entitled to claim
through them; all unknown persons with any right, title or interest in the real estate
described herein; who may be in the military service of the United States of
America, being a class designated as John Doe; and any unknown minors or
persons disability being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor Credit Company; General

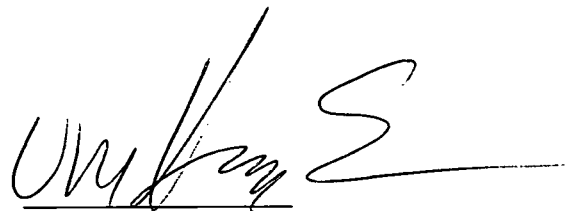
Motors Acceptance Corporation; White Directory Holding Carolina, Inc. d/b/a The Talking Phone Book; Monogram Credit Card Bank of Georgia; Michael Twitty; Deborah Twitty; The United States of America, by and through its agency, The Internal Revenue Service; and John C. Bigler..... Defendants,
Of Whom Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards _____Appellant.

PROOF OF SERVICE

I HEREBY CERTIFTY that I have served The Appellant Reply for the Respondent Motion to Dismiss the Appeal To the Respondent Attorney on February 26, 2014, by Depositing a copy of each in the United States Mail, postage prepaid,m addressed to following on record;

Sean M. Foerster
Rogers & Townsend & Thomas PC
P. O. Box 100200 (29202)
220 Executive Center Drive
Columbia, South Carolina, 29210
(803) 771-7900

Attorneys for Responder Deutsche Bank
National Trust Company, As Trustee of
Amerquest Mortgage Securities, Inc.
Asset Backed Pass Through Certificates,
Series 2005-R4CGM under pooling
And Servicing Agreement dated May 1, 2005,
Without recourse



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(843) 801-7392

The Appellant-PRO SE

To: Whom this may concern

I am sending 7 copies to the South Carolina
of Appeal and one copy to the Respondent attorney
this file and Clockito Appellate Case

NO. 2012-21254

Thank you

Vandora M. Edwards

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SC Court of Appeals