

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 Final Brief"

Appellant does hereby certify that, according to the best of my comprehension, the Final Brief does comply with the SC Rules of Civil Procedure – Rule 211.

Date: January 5, 2015

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

Geary-Thomas: Dooly

RECEIVED

JAN 05 2015

SC Court of Appeals

RECEIVED

JAN 05 2015

SC Court of Appeals

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 Final Brief"

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: JANUARY 5, 2015

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

Geary-Thomas: Dooly

RECEIVED

JAN 05 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

SC 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-Rev
1/5/15"**

Appellant does hereby certify that, according to the best of my comprehension, the Record On Appeal-Rev 1/5/15 does include all materials proposed to be included by any of the parties and not any other material.

Date: January 5, 2015

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

Geary-Thomas: Dooly

RECEIVED

JAN 05 2015

SC Court of Appeals

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- Rev 1/5/15"

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: January 5, 2015

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

Geary-Thomas: Dooly

RECEIVED

JAN 05 2015

SC Court of Appeals

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

PROOF OF SERVICE OF RECORD ON APPEAL - Rev 1/5/15

I, geary-thomas: dooly, Appellant, do hereby certify that I have served all counsel in this action with a copy of the document "Record On Appeal - rev 1/5/15 by mailing acopy os same by United States Mail, postage prepaid to the following:

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

January 5, 2015

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

Geary Thomas: Dooly

RECEIVED

JAN 05 2015

SC Court of Appeals

Geary-Thomas: Dooly
c/o P.O.Box 3326
Spartanburg, SC 29306

Nelson, Mullins, Riley, & Scarborough, LLP
Attn: Sarah R. Anderson, Giles M. Schanen
P.O.Box 10084
Greenville, South Carolina 29603-0084

January 5, 2015

Re: Deutsche Bank v. Geary Thomas Dooly
Appellate Case #: 2014-000600 [CCP #:2012 - CP- 42-3027]

Dear Ms. Anderson and Mr. Giles:

Please find herein:

1. Letter to The Court of Appeals with attached five (5) documents presented.

2. Your copy of the Record On Appeal(ROA) -Rev 1/5/15. The original ROA was disassembled and re-assembled with copies having redacted the hand written notes objected to in your Motion. Also the last several pages were changed to remove one of my documents inadvertently included, AND to insert your Document, "Motion To Dismiss", Dated August 1, 2013.

Please mail to me, the old copy that you have in your files that is being replaced by this revised copy of ROA so that I can insert same pages in it for use as my revised copy. I will greatly appreciate that.

For you reference, the pages replaced were: ROA-1, 38, 56, 64, 120, 230, 232, 240, 366, 367, 368.

Sincerely,
geary-thomas:dooly

copy: SC Appellate Court

Geary-Thomas: Dooly
c/o P.O.Box 3326
Spartanburg, SC 29306

RECEIVED

JAN 05 2015

SC Court of Appeals

January 5, 2015

South Carolina Court of Appeals
The Honorable Jenny Abbott Kitchings, Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

Re: Deutsche Bank v. Geary Thomas Dooly
Appellate Case #: 2014-000600 [CCP #:2012 - CP- 42-3027]

Dear Ms. Kitchings:

With this letter please find:

1. "Proof of Service of Record On Appeal - Rev 1/5/15". This includes 15 bound, and 1 unbound copies.
2. "Appellant's Certificate of Counsel as to Final Brief".
3. Certificate of Service as to "Appellant's Certificate of Counsel as to Final Brief" to Respondent(s).
4. Appellant's "Certificate of Counsel as to Contents of Record On Appeal- Rev 1/5/15".
5. Certificate of Service of "Appellant's "Certificate of Counsel as to Contents of Record On Appeal- Rev 1/5/15" to Respondent(s).

Some of the above documents may be duplicates in that some documents were lost, then found, therefore, included herein.
Note that some of the above was actually hand delivered to Ms.

Amelia Smith of the Court of Appeals on this date.

All copies of Record On Appeal were disassembled, and pages replaced with hand written notes redacted, and with additional document(s) included, as well as changing the back cover from plastic to paper, in accord with Motion of Respondent.

Thank you for your service. Please advise if anything is not in accord with the Court's policies & rules.

Sincerely,
geary-thomas:dooly

Geary-Thomas: Dooly

Copy to: Nelson, Mullins, Riley, & Scarborough, LLP Attn: Sarah Anderson, and Giles Schanen P.O.Box 10084 Greenville, South Carolina 29603-0084.