

423 Bayne Street • Orangeburg, SC 29115 • Ph: 803-268-0716 • Fx: 803-534-6727

February 24, 2015

**NOTIFICATION OF A SIGNIFICANT
AND MAJOR TYPOGRAPHICAL ERROR**

The Honorable Jenny Abbot Kitchings and the Honorable V. Claire Allen
Clerk of Court & Deputy Clerk of Court; Respectively,
South Carolina Court of Appeals
POB 11629
Columbia, SC 29211

RECEIVED

MAR 03 2015

SC Court of Appeals

RE: Wells Fargo Bank, N.A. v. Dorothy Sistrunk
Civil Action Case #2008-CP-38-1024
Appellate Case #2014-001683

Ms. Kitchings and/or Ms. V. Claire Allen,

I am new at this so...please advise me of errors and/or any incorrect protocol. I am notifying the Clerk of Court and the Deputy Clerk of Court of a significant and major typographical error in my "**Appellant Objects to Wells Fargo's Motion to Strike**" on page 25, in paragraph #42(c) & Subpart (2) that was mailed on February 24, 2015. Exhibit 326 must be removed in order to avoid confusion and some words were double typed that might interfere with a direct quote. See attached copy circled in red. The error was discovered today, shortly after mailing my "**Appellant Objects to Wells Fargo's Motion to Strike**".

MY SOLUTION TO THE PROBLEM IS THE SAME AS BEFORE

In order to correct this error, and pursuant to *Rule 240(e), SCACR*, my solution is this: I am enclosing an original and (6) copies to replace the page on which the major and significant error occurred, along with the circled errors on page 25. I am also serving a copy of the corrected page to all parties listed on page 2, postage prepaid with "Proof of Service".

**I NEVER RECEIVED A RECOMMENDATION
IN THE EVENT MY PRIOR SOLUTION WAS UNACCEPTABLE**

I never received a recommendation in the event my prior method of correcting the typo error was unacceptable. Therefore, I am using the same method as before. My husband has not researched this matter since January 6th - 7th, 2015. Therefore, I am relying on the same information as before., i.e.,:

1. New York's Appellate Court only addresses misspelled words and accepts replacement briefs.

See: <http://www.nycourts.gov/courts/ad4/Clerk/FAQ-appeals.html#tpa8>

2. The Supreme Court of Alaska's Order No. 1597, addresses typographical errors on page 2, in paragraph **(D)**.

See: <http://www.courts.alaska.gov/sco/sco1597.pdf>

3. *Rule 211(b)(2), SCACR* states the following in pertinent parts; "The party may correct obvious typographical errors and misspellings which were contained in the initial brief. No other changes may be made." This rule only addresses the "Initial Brief".

Thank you.

1/s Dorothy Sistrunk

Dorothy Sistrunk

CC:

Michael Anzelmo
SC Bar No. 72933
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

Elizabeth Scott Moise
SC Bar No. 012945
151 Meeting Street / Sixth Floor
Post Office Box 1806 (29402-1806)
Charleston, SC 29401 -2239
(803) 853-5200

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Diane Shafer Goodstein, Circuit Court Judge

2014-001683

Wells Fargo Bank, N.A.,

v.

Dorothy Sistrunk,

Respondent,

Appellant.

PROOF OF SERVICE

I certify that I have served a copy of page 25, paragraph #42(c) & Subpart (2) that was mailed on February 24, 2015 in my "**Appellant Objects to Wells Fargo's Motion to Strike**" to correct a significant and major typographical error by depositing a copy of the corrected page 25, in the United Parcel Service Store & Mailbox Service, postage prepaid, on February 25, 2015, addressed to Wells Fargo's attorney/s of record that are listed below. My "**Appellant Objects to Wells Fargo's Motion to Strike**" was mailed on February 24, 2015. The significant and major typographical error was also discovered on February 24, 2015.

Today's Date: February 25, 2015

/s *Dorothy Sistrunk*
Dorothy Sistrunk
423 Bayne Street
Orangeburg, South Carolina 29115
(803) 268-0716

Attorney Michael Anzelmo
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

Elizabeth Scott Moise
151 Meeting Street / Sixth Floor
Post Office Box 1806 (29402-1806)
Charleston, SC 29401 -2239
(803)853-5200

RECEIVED

MAR 03 2015

SC Court of Appeals

nation. The Appellant demanded strict proof that a determination was being made, methods, procedures, qualification requirements and the personnel responsible for the decision; to date, no documentation has been provided. **Misrepresentation #1** and/or **Misrepresentation #2** lasted for 2 years during the Stay/TRO. {App.s 16-18}

(c) The Outright Lies and Misrepresented Facts that constitute false testimony in the **Attorney Drafted Partial Summary Order** Judge Goodstein signed on March 27, 2014 that was drafted by Elizabeth Scott Moise. The Order is replete with Outright Lies and Misrepresented Facts, like the examples listed below. {See App, 1, Ex.s 326 & 329} ^{DS} 2/24/15

(1) **Outright Lie #1:** "[T]he loan closed on December 21, 2007 and the Defendant and her lawyer attended the closing." {pg 3, #12} **No lawyer attended the closing with the Appellant on December 21, 2007.**

(2) **Outright Lie #2:** "[T]he Defendant and her family needed new housing because they did not want to be responsible for costs associated with yard work for a home that the Defendant and her family rented at 574 Coburg Lane, Orangeburg, South Carolina of yard work is the reason the Defendant needed new housing." {pg 2, #1} **The cost associated with yard work had nothing to do with the Appellant's need for new housing. In addition, the Appellant and her family did not reside at (this maybe a legitimate error) 574 Coburg Lane.** ^{DS} 2/24/15

(3) **Misrepresentation #1:** "[I]n response to an advertisement in a local newspaper, Defendant's husband contacted Thomas Jacobs ("Jacobs" or sometimes "seller") to inquire about various houses he had for sale." {pg 2, #2} **The Appellant's husband never contacted Thomas Jacobs about houses he had for sale.**

(4) **Misrepresentation #2:** "[A]fter Defendant's husband looked at several houses with Jacobs, her husband decided to purchase a home located at 423 Bayne Street in Orangeburg, South Carolina ("423 Bayne Street")." {Pg 2, #3} **The Appellant's husband never decided to purchase 423 Bayne Street after looking at several houses with Thomas Jacobs.**

(5) **Misrepresentation #3:** "[I]n the month prior to closing, Defendant and her family moved into 423 Bayne Street and started cleaning and making repairs." {pg 2, #4} **The Appellant and her family did not move into 423 Bayne Street in the month prior to closing and started cleaning and making repairs. Notice:** Attorney Moise's own statements verifies the **Appraisal Fraud** and **Document Fraud** of Jim H. Austin, III.

nation. The Appellant demanded strict proof that a determination was being made, methods, procedures, qualification requirements and the personnel responsible for the decision; to date, no documentation has been provided. **Misrepresentation #1** and/or **Misrepresentation #2** lasted for 2 years during the Stay/TRO. *{App.s 16-18}*

(c) The Outright Lies and Misrepresented Facts that constitute false testimony in the **Attorney Drafted Partial Summary Order** Judge Goodstein signed on March 27, 2014 that was drafted by Elizabeth Scott Moise. The Order is replete with Outright Lies and Misrepresented Facts, like the examples listed below. *{See App, 1, Ex. 329}*

(1) **Outright Lie #1:** "[T]he loan closed on December 21, 2007 and the Defendant and her lawyer attended the closing." *{pg 3, #12}* **No lawyer attended the closing with the Appellant on December 21, 2007.**

(2) **Outright Lie #2:** "[T]he Defendant and her family needed new housing because they did not want to be responsible for costs associated with yard work for a home that the Defendant and her family rented at 574 Coburg Lane, Orangeburg, South Carolina." *{pg 2, #1}* **The cost associated with yard work had nothing to do with the Appellant's need for new housing. In addition, the Appellant and her family did not reside at (this maybe a legitimate error) 574 Coburg Lane.**

(3) **Misrepresentation #1:** "[I]n response to an advertisement in a local newspaper, Defendant's husband contacted Thomas Jacobs ("Jacobs" or sometimes "seller") to inquire about various houses he had for sale." *{pg 2, #2}* **The Appellant's husband never contacted Thomas Jacobs about houses he had for sale.**

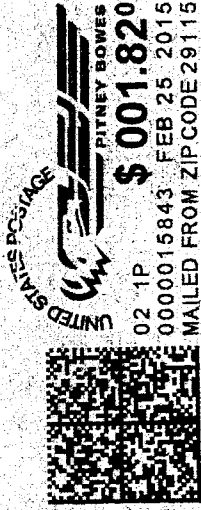
(4) **Misrepresentation #2:** "[A]fter Defendant's husband looked at several houses with Jacobs, her husband decided to purchase a home located at 423 Bayne Street in Orangeburg, South Carolina ("423 Bayne Street")." *{Pg 2, #3}* **The Appellant's husband never decided to purchase 423 Bayne Street after looking at several houses with Thomas Jacobs.**

(5) **Misrepresentation #3:** "[I]n the month prior to closing, Defendant and her family moved into 423 Bayne Street and started cleaning and making repairs." *{pg 2, #4}* **The Appellant and her family did not move into 423 Bayne Street in the month prior to closing and started cleaning and making repairs. Notice:** Attorney Moise's own statements verifies the **Appraisal Fraud** and **Document Fraud** of Jim H. Austin, III.

Dorothy Sistrunk
423 Bayne Street
Orangeburg, South Carolina 29115

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
POB 11629
Columbia, SC 29211

Sistrunk
/ne Street
burg, South Carolina 29115



FIRST CLASS

RECEIVED

MAR 03 2015

SC Court of Appeals

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
POB 11629
Columbia, SC 29211