

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEALS FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Circuit Court Judge

Case No. 2010-CP-40-0657

RECEIVED
JUN 15 2015
SC Court of Appeals

HSBC Mortgage Service Inc., Respondent,

v.

Alice Lucas a/k/a Alice Marie Felder-Lucas; Dwight Lucas; Mortgage Electronic Registration Systems, Inc. (MIN #100176105012597608); Mortgage Electronic Registration Systems, Inc. (MIN #1002033-0000024059-5); Windsor Lake Park Homeowners Association, Inc.; Defendant.

Of Whom Alice Lucas and Dwight Lucas are the Appellants

FINAL BRIEF

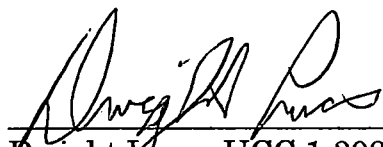
Mr. Dwight Lucas
Mrs. Alice Lucas
7916 Bay Springs Road
Columbia, SC 29223
(803) 312-2107
Pro Se


Rebecca K. Lindahl, Esq.
Richard L. Farley, Esq.
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(704) 444-2000
Attorneys for Respondent

For the claim is that we are writing this Final Brief to explain why we are appealing the Order Denying Motion for Acceptance (R. p. 4). For the claim is we the defendant, were never served Notice of a Hearing for this Motion. For the claim is we paid \$25.00 to have a Motion for a hearing, but never got the opportunity to do so. For the claim is on March 13, 2014, we were scheduled to attend a Summary Judgment hearing, my wife went to the hearing and was told by the Attorney from Roger Townsend & Thomas, P.C before the hearing, in the hall, that this hearing was just for the Summary Judgment and he gave her a copy of the paperwork. For the claim is at no time, did he mention that there would be a hearing on our Motion. For the claim is my wife said she was told that she did not have to stay for the hearing.

For the claim is in our Motion for Acceptance (R. p. 3, Exhibit 1, p. 5) there was a section that dealt with our Perfected Security Interest which we believe to be the most important section for the Motion for Acceptance. (R. Exhibit 1, p. 5) Under the – Uniform – Commercial – Code – Revised Article 9 section 203(b) indicates that our Perfected Security Interest trumps any creditor lien or judgment of a court. For the claim is we have been the caretakers (maintenance, upkeep, guardian) of 7916 Bay Springs Road, Columbia, South Carolina 29223, for over ten years. For the claim is our Interest arised as soon as we 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 we have been living at this location, in which we have been living more than ten years (870,000.00). For the claim is our Perfected Security Interest outweighs the Interest of HSBC Mortgage Services, Inc and others, and it can not be denied under any law.

For the claim is our Perfect Sercuity Interest takes presedent over the judgment that has been granted to HSBC Mortgage Services, Inc by the lower court.


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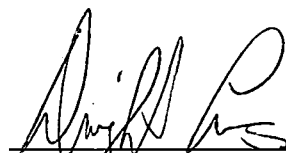
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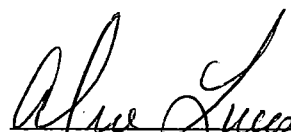
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CERTIFICATE OF APPELLANT

The undersigned hereby certifies that this Final Brief does hereby comply with Rule 211(b).



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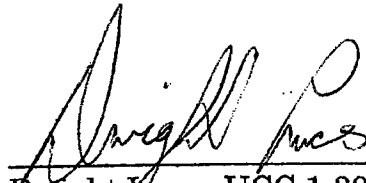
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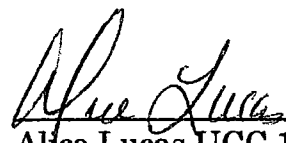
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PROOF OF SERVICE

I certify that I have served the Final Brief by depositing a copy of it in the United States Mail, postage prepaid, on June 15, 2015, addressed to the attorney of record, Rebecca K. Lindahl and Richard L. Farley, 550 South Tryon Street, Suite 2900, Charlotte, North Carolina 28202.


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