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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

ORIGINAL

APPEALS FROM RICHLAND COUNTY  
Court of Common Pleas

FEB 23 2015

Joseph M. Strickland, Master-In-Equity

Case No. 2010-CP-40-0657

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.

Appellant Case No. 2014-000747

RECORD ON APPEAL

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.  
KATTEN MUCHIN ROSENMAN LLP  
550 South Tryon Street, Suite 2900  
Charlotte, North Carolina 28202  
(704) 444-2000  
Attorneys for Respondent

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Order of March 28, 2014

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS  
CASE NO.: 2010-CP-40-0657

HSBC,

Plaintiff,

vs.

ALICE LUCAS, ET AL.,

Defendant(s)

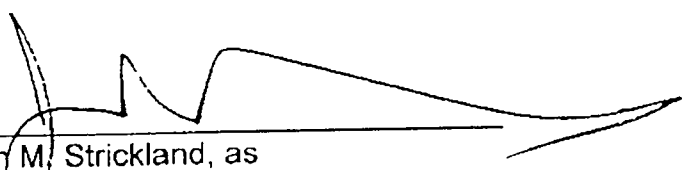
ORDER DENYING MOTION  
FOR ACCEPTANCE

RICHLAND COUNTY  
FILED  
2014 MAR 28 PM 2:14  
JANELLE W. McBRIDE  
C.C.P. & C.S.

The matter before the Court is a Motion for Acceptance filed by the defendant.

The motion is denied.

AND IT IS SO ORDERED.



\_\_\_\_\_  
Joseph M. Strickland, as  
Master in Equity for Richland County

Columbia, South Carolina  
March 28, 2014

cc: Vance Brabham, Esquire  
Alice Lucas, Pro-se  
Dwight Lucas, Pro-se

Motion for Acceptance  
(Claims Reduce to Summary Judgment)

---

STATE OF SOUTH CAROLINA

COUNTY OF

Richland

IN THE COURT OF COMMON PLEAS  
5th JUDICIAL CIRCUIT

CASE NO.: 10-CP-40-0657

MOTION AND ORDER INFORMATION  
FORM AND COVERSHEET

HSBC Mortgage Services Inc  
Plaintiff,

Alicia Lucas aka vs. Alicia Marie Felder  
Dwight Lucas  
Royce Townsend + Thomas Defendant.  
Lucas  
PRC

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Plaintiff's Attorney:<br>_____, Bar No. _____<br>Address: _____<br>Phone: _____ Fax _____<br>E-mail: _____ Other: _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Plaintiff's Attorney:<br><u>Royce Townsend</u> , Bar No. <u>1101175</u><br>Address: <u>250 Executive Center Drive</u><br>Phone: <u>803 744-4444</u> Fax _____<br>E-mail: <u>rtt@law.com</u> Other: _____ |
| <input checked="" type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)<br><input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)<br><input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                          |
| SECTION I: Hearing Information<br>Nature of Motion: <u>Motion of Acceptance</u><br>Estimated Time Needed: <u>15 mins</u> Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                          |
| SECTION II: Motion/Order Type<br><input checked="" type="checkbox"/> Written motion attached<br><input type="checkbox"/> Form Motion/Order<br>I hereby move for relief or action by the court as set forth in the attached proposed order.<br><u>Alicia Lucas</u> <u>2/25</u> , 20 <u>14</u><br>Signature of Attorney for <input type="checkbox"/> Plaintiff / <input checked="" type="checkbox"/> Defendant Date submitted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                          |
| SECTION III: Motion Fee<br><input type="checkbox"/> PAID - AMOUNT: \$ _____<br><input type="checkbox"/> EXEMPT: (check reason) <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support<br><input type="checkbox"/> Domestic Abuse or Abuse and Neglect<br><input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party<br><input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief<br><input type="checkbox"/> Motion for Stay in Bankruptcy<br><input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)<br><input type="checkbox"/> Proposed order submitted at request of the court; or,<br>reduced to writing from motion made in open court per judge's instructions<br>Name of Court Reporter: _____<br><input type="checkbox"/> Other: _____ |                                                                                                                                                                                                          |
| JUDGE'S SECTION<br><input type="checkbox"/> Motion Fee to be paid upon filing of the attached order.<br><input type="checkbox"/> Other: _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | JUDGE CODE _____<br>Date: _____, 20 _____                                                                                                                                                                |
| CLERK'S VERIFICATION<br>Collected by: <u>[Signature]</u> Date Filed: _____, 20 _____<br><input type="checkbox"/> MOTION FEE COLLECTED: \$ <u>25</u><br><input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                          |

Dwight Lucas  
Alice Lucas  
7916 Bay Springs Road  
Columbia, South Carolina 29223

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

HSBC Mortgage Services, Inc.,

Plaintiff(s),

vs

Alice Lucas,  
a/k/a Alice Marie Felder-Lucas,  
Dwight Lucas,  
Rogers, Townsend & Thomas, PC.,

Defendant(s)

IN THE COURT OF COMMON PLEAS

Case No.: 10-CP-40-0657

MOTION FOR ACCEPTANCE

JEANETTE W. JOHNSON  
Clerk of Court

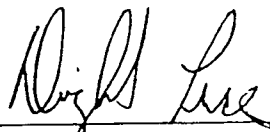
2014 FEB 25 PM 2:36

RICHLAND COUNTY  
FILED

*COMES NOW*, in peace, by special visitation, I, Dwight Lucas, a living, breathing, sentient, Christian man, and Alice Lucas, a/k/a Alice Marie Felder-Lucas a living, breathing, sentient, Christian woman the undersigned, and the verified holder of an attached perfected security interest and the acknowledged representative for the debtors herein named as DWIGHT LUCAS and ALICE LUCAS, a/k/a ALICE MARIE FELER-LUCAS, the defendant in this action (See Exhibit 1). There is no dispute with any of the facts in the instant matter. The facts of this case and all charges/offers/dishonors are accepted for value and returned in exchange for settlement and closure (See Exhibit 2). This property is exempt from levy.

I did not find a check enclosed in Rogers, Townsend & Thomas, PC offers  
Styled SUMMONS AND COMPLAINT, LIS PENDENS, CASE NUMBER: 10-CP-  
40-0657, served on DWIGHT LUCAS and ALICE LUCAS, a/k/a ALICE MARIE  
FELER-LUCAS. Therefore, a Registered Bill of Exchange has been sent to the  
Secretary of the Treasury for discharge of the debt specified in Rogers, Townsend &  
Thomas, PC offers (See Exhibit 3).

Please adjust this account for the Bonds, Proceeds, Products, Accounts and  
Fixtures, and RELEASE the Order(s) of the Court thereafter to me immediately.



Dwight Lucas, Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice



Alice Lucas, a/k/a Alice Marie Felder-Lucas,  
Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice

Dated: 2/25/14

Dwight Lucas  
Alice Lucas  
7916 Bay Springs Road  
Columbia, South Carolina 29223

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

HSBC Mortgage Services, Inc.,

Plaintiff(s),

vs

Alice Lucas,  
a/k/a Alice Marie Felder-Lucas,  
Dwight Lucas,  
Rogers, Townsend & Thomas, PC.,

Defendant(s)

} IN THE COURT OF COMMON PLEAS

}

Case No.: 10-CP-40-0657

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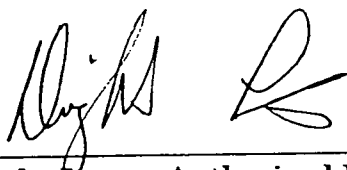
}

CLAIM REDUCED TO  
SUMMARY JUDGMENT

Pursuant to Revised Article 9 of the Uniform Commercial Code, the verified perfection of an attached security interest held by Dwight Lucas, and Alice Lucas, a/k/a Alice Marie Felder-Lucas the Principal(s) In Fact, Secured Party, to the Defendant(s) debtors in this action, herein named DWIGHT LUCAS and ALICE LUCAS, a/k/a ALICE MARIE FELER-LUCAS, whose perfection cannot be denied, takes precedent over a creditor lien judgment. Revised Article 9 §9-203(b) uses the term "attachment" to describe the moment at which a security interest becomes enforceable against the debtor. Therefore, the security interest has already become

enforceable, and a ruling for the Plaintiff(s) by the court would have no effect.

Pursuant to Revised Article 9 of the Uniform Commercial Code, an attached security interest prevails over a creditor using judicial process to obtain a lien on collateral. This property is exempt from levy. I, Dwight Lucas, and Alice Lucas, a/k/a Alice Marie Felder-Lucas, Secured Party, have reduced my claim to judgment upon the default of the Plaintiff(s), HSBC MORTGAGE SERVICES, INC., in accordance with Revised Article 9 §9-601 of the Uniform Commercial Code.



**Dwight Lucas, Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice**



**Alice Lucas, a/k/a Alice Marie Felder-Lucas,  
Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice**

Dated: 2/25/14

Dwight Lucas  
Alice Lucas  
7916 Bay Springs Road  
Columbia, South Carolina 29223

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

HSBC Mortgage Services, Inc.,

Plaintiff(s),

vs

Alice Lucas,  
a/k/a Alice Marie Felder-Lucas,  
Dwight Lucas,  
Rogers, Townsend & Thomas, PC.,

Defendant(s)

} IN THE COURT OF COMMON PLEAS

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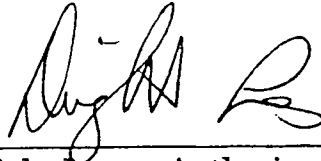
}

Case No.: 10-CP-40-0657

NOTICE OF SETTLEMENT

There is no dispute of the facts of this proceeding, and in holding certified verification of my acceptance and return, of the commercial dishonors of my acceptance of the Plaintiff(s) offers, and the exchange having been completed, I, Dwight Lucas, and Alice Lucas, a/k/a Alice Marie Felder-Lucas, holding a perfected security interest in the debtors DWIGHT LUCAS and ALICE LUCAS, a/k/a ALICE MARIE FELER-LUCAS, named as Defendant(s) in this action and the HSBC MORTGAGE SERVICES, INC., (default), accept all charges both public and private. I, Dwight Lucas, and Alice Lucas, a/k/a Alice Marie Felder-Lucas, having

reduced our claim to judgment, deem this matter settled upon acceptance without need for attachment of additional collateral fixtures.



Dwight Lucas, Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice



Alice Lucas, a/k/a Alice Marie Felder-Lucas,  
Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice

Dated: 2/25/14

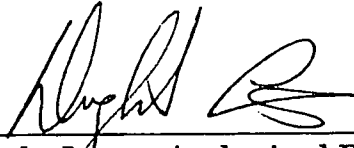
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the of the Defendant's  
MOTION FOR ACCEPTANCE, CLAIM REDUCED TO SUMMARY JUDGMENT,  
and NOTICE OF SETTLEMENT have been served by United States Mail/Certified  
Mail Return Receipt Requested, to the following addressees on this 25<sup>th</sup> day of  
February, in the year of Our Lord 2014:

Rogers, Townsend & Thomas, PC  
220 Executive Center Drive  
Columbia, South Carolina 29210

[Attorney for Plaintiff(s)]

ROHLAND COUNTY  
FILED  
2014 FEB 25 PM 2:36  
JEANETTE W. McBRIDE  
C.C.P. & G.S.



Dwight Lucas, Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice



Alice Lucas, a/k/a Alice Marie Felder-Lucas,  
Authorized Representative  
Principal In Fact—Secured Party  
All Rights Reserved, Without Prejudice

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

HSBC Mortgage Services Inc.,

Plaintiff,

Treasury

Charge: DWIGHT LUCAS

Alice Lucas a/k/a Alice Marie Felder-Lucas;  
Dwight Lucas; Mortgage Electronic Registration  
Systems, Inc. (MERS) (MERS #00176105012597600);  
Mortgage Electronic Registration Systems, Inc.  
(MERS #002033-00000240595); Windsor Lake  
Park Homeowners Association, Inc.

Defendant(s).

IN THE COURT OF COMMON PLEAS

DOCKET NO. 10-CP-40-0657

AFFIDAVIT IN SUPPORT OF  
SUPPLEMENTAL JUDGMENT  
Deficiency Judgment Waived

Accept For Value Return For Value

Exempt

By:

A.R. Date

EIN: 355-5523

Deposit

Charge: DWIGHT LUCAS

SSN: 355-4223

(010062-02044)

Personally appeared, the undersigned, who being duly sworn, deposes and says:

I am one of the attorneys for the Plaintiff in the above captioned action. On May 21, 2010, a Judgment of Foreclosure and Sale was issued. Prior to the scheduled sales date, the Defendant(s), Dwight Lucas filed for relief under Chapter 13, U. S. Bankruptcy Code on May 28, 2010. Subsequent to such filing, the bankruptcy was dismissed on July 8, 2010. In order to supplement this Court's previous Judgment of Foreclosure and Sale and to reflect the effect of the Defendants' Chapter 13 filing, a supplemental order was presented to the Court.

The following principal, interest and escrow/corporate advances which are secured by the mortgage being foreclosed, have been incurred to the date of hearing shown herein below (see also attached, as Exhibit "A", the itemized debt printout from the Plaintiff):

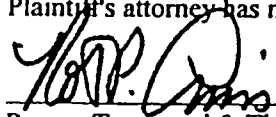
- I. Amended judgment debt is as follows:
  - (a) Principal now due..... \$146,854.15
  - (b) Interest from February 1, 2009 through August 15, 2010 at 10% per annum ..... \$23,899.71
  - (c) Advances (Escrow Advances, Corporate Charges including attorney fees, costs, and other charges previously paid)..... \$6,615.00
  - (d) Allowable Late Charges..... \$829.74
  - (e) Additional Costs of collection since previous hearing..... \$25.00

(f) Attorney's Fees..... \$3,520.00

NEW TOTAL DEBT now secured by Note and Mortgage  
including interest to date shown..... \$181,743.60

The new total debt shall accrue interest hereafter at the rate of 10% per annum.

2. Pursuant to an Administrative Order of the South Carolina Supreme Court dated May 22, 2009, the Plaintiff has set forth its belief in its Complaint or by Affidavit, which is already of record in this case, that the mortgage loan which is the subject of this foreclosure action is not eligible for modification pursuant to the terms of the Home Affordable Modification Program (HMP), and therefore Plaintiff has fully complied with said Order, and the foreclosure may proceed. Also Plaintiff called attention that pursuant to Administrative Order of the South Carolina Supreme Court dated May 22, 2009, Plaintiff's attorney has not received a counter affidavit from the Defendant(s).

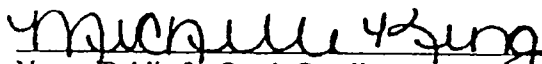


Rogers Townsend & Thomas, PC  
ATTORNEYS FOR PLAINTIFF

Samuel C. Waters (SC Bar #5958) Cheryl H. Fisher (SC Bar #15213)  
Reginald P. Corley (SC Bar #69453) Jennifer W. Rubin (SC Bar #16727)  
Ellie C. Floyd (SC Bar # 68635) Michael P. Morris (SC Bar #73560)  
Eve Moredock Stacey (SC Bar # 5300) Mary R. Powers (SC Bar #16534)  
Robert P. Davis (SC Bar # 74030) Shawn R. Willis (SC Bar # 71155)  
William S. Kochler (SC Bar # 74935) Kevin T. Hardy (SC Bar #76015)  
Benjamin J. Powell (SC Bar #77205) John P. Fetner (SC Bar # 77460)  
Kelsey K. Brockbank (SC Bar # 77519)  
220 Executive Center Drive, Suite 109 Post Office Box 100200 (29202)  
Columbia, SC 29210 (803) 744-4444

Columbia, South Carolina

Sworn to before me this 5 day of August, 2010.

 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: 3/26/2020

No personal or deficiency judgment being demanded, the bidding will not remain open after the date of sale, but compliance with the bid may be made immediately.

Purchaser to pay for documentary stamps on Master's Deed. The successful bidder will be required to pay interest on the balance of the bid from date of sale to date of compliance with the bid at the rate of 10% per annum.

SUBJECT TO ASSESSMENTS, RICHLAND COUNTY TAXES, EXISTING EASEMENTS, EASEMENTS AND RESTRICTIONS OF RECORD, AND OTHER SENIOR ENCUMBRANCES.

Samuel C. Waters

Joseph M. Strickland  
As Master in Equity for Richland County

Attorney for Plaintiff  
010062-02044

Website: [www.rtt-law.com](http://www.rtt-law.com) (see link to Resources/Foreclosure Sales)

INSERT:

ACCEPTANCE

Motion for Objection to Order Denying  
Motion for Acceptance

---

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

HSBC Mortgage Services, Inc.,

Plaintiff(s),

vs

Alice Lucas,  
a/k/a Alice Marie Felder-Lucas,  
Dwight Lucas,  
Mortgage Electronic Registration,  
Inc., (MIN #1001761050112597608),  
Mortgage Electronic Registration,  
Inc., (MIN #1002033-0000024059-5),  
Windsor Lake Park Homeowners  
Association, Inc., Rogers, Townsend  
& Thomas, PC.,

Defendant(s)

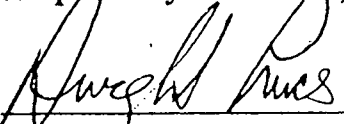
Case No.: 10-CP-40-0657

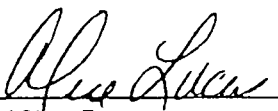
*Response*  
MOTION FOR OBJECTION  
TO ORDER  
DENYING MOTION FOR  
ACCEPTANCE

RICHLAND COUNTY  
FILED  
2014 APR -4 PM 3:54  
JEANETTE L. MCNEIDE  
Clerk of Court

I Dwight Lucas and Alice Lucas hereby affirms and swears that we were never served a motion to dismiss or deny our Motion of Acceptance filed on February 25, 2014. We object to the order denying Motion of Acceptance simply because we were never served papers or given the opportunity to answer the papers that were filed by the plaintiff's attorney.

Respectfully submitted,

  
Dwight Lucas

  
Alice Lucas,  
a/k/a Alice Marie Felder-Lucas

Dated: 4/4/14

STATE OF SOUTH CAROLINA    }  
                                          }  
THE ORDER  
COUNTY OF RICHLAND        }  
ACCEPTANCE  
-----                            }

CERTIFICATE OF MAILING  
MOTION FOR OBJECTION TO

DENYING MOTION OF

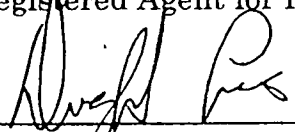
I, Alice Lucas, a/k/a Alice Marie Felder-Lucas and my husband  
Dwight Lucas, the Defendant(s), hereby certify that we forwarded by Certified Mail  
Return Receipt Requested the attached Motion for Objection to Order Denying  
Motion for Acceptance the following addressees on this 4<sup>th</sup> day of  
April, 2014:

Rogers, Townsend & Thomas, PC  
220 Executive Center Drive  
Columbia, South Carolina 29210

[Attorney for Plaintiff(s)]

CT Corporation System  
2 Office Park Court – Suite 103  
Columbia, SC 29223  
Mortgage Services, Inc.]

[Registered Agent for HSBC Mortgage Services]  
Inc.

  
Dwight Lucas



Alice Lucas,  
a/k/a Alice Marie Felder-Lucas

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

HSBC,

Plaintiff,

vs.

ALICE LUCAS, ET AL.,

Defendant(s)

IN THE COURT OF COMMON PLEAS

CASE NO.: 2010-CP-40-0657

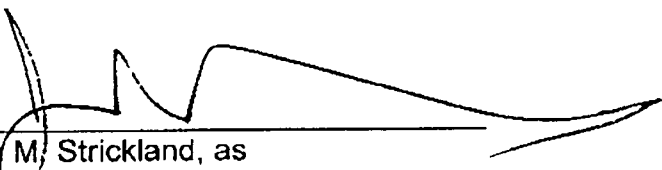
ORDER DENYING MOTION  
FOR ACCEPTANCE

RICHLAND COUNTY  
FILED  
2014 MAR 28 PM 2:41  
JEANELLE M. McBRIDE  
C.C.P. & C.S.

The matter before the Court is a Motion for Acceptance filed by the defendant.

The motion is denied.

AND IT IS SO ORDERED.

  
\_\_\_\_\_  
Joseph M. Strickland, as  
Master in Equity for Richland County

Columbia, South Carolina

March 28, 2014

cc: Vance Brabham, Esquire  
Alice Lucas, Pro-se  
Dwight Lucas, Pro-se

Appellant's Exhibits 1

UCC 1

—

**EXHIBIT – '1'**

**UCC 1 – Public Notice  
Perfected Security Interest**

# UCC FINANCING STATEMENT UCC-1

FOLLOW INSTRUCTIONS

|                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------|
| A. NAME & PHONE OF CONTACT AT FILER (optional)                                                                             |
| B. E-MAIL CONTACT AT FILER (optional)                                                                                      |
| C. SEND ACKNOWLEDGMENT TO: (Name and Address)                                                                              |
| <div style="border: 1px solid black; padding: 5px;"> Dwight Lucas<br/> 7916 Bay Spring Road<br/> Columbia, SC 29223 </div> |

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

|                         |                          |                     |                               |             |
|-------------------------|--------------------------|---------------------|-------------------------------|-------------|
| 1a. ORGANIZATION'S NAME |                          |                     |                               |             |
| OR                      | 1b. INDIVIDUAL'S SURNAME | FIRST PERSONAL NAME | ADDITIONAL NAME(S)/INITIAL(S) | SUFFIX      |
|                         | LUCAS                    | DWIGHT              |                               |             |
| 1c. MAILING ADDRESS     |                          | CITY                | STATE                         | POSTAL CODE |
| 7916 Bay Spring Road    |                          | Columbia            | SC                            | 29223       |
|                         |                          |                     | COUNTRY                       | USA         |

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

|                         |                          |                     |                               |             |
|-------------------------|--------------------------|---------------------|-------------------------------|-------------|
| 2a. ORGANIZATION'S NAME |                          |                     |                               |             |
| OR                      | 2b. INDIVIDUAL'S SURNAME | FIRST PERSONAL NAME | ADDITIONAL NAME(S)/INITIAL(S) | SUFFIX      |
|                         |                          |                     |                               |             |
| 2c. MAILING ADDRESS     |                          | CITY                | STATE                         | POSTAL CODE |
|                         |                          |                     |                               |             |
|                         |                          |                     | COUNTRY                       |             |

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

|                         |                          |                     |                               |             |
|-------------------------|--------------------------|---------------------|-------------------------------|-------------|
| 3a. ORGANIZATION'S NAME |                          |                     |                               |             |
|                         | HSBC Mortgage Services   |                     |                               |             |
| OR                      | 3b. INDIVIDUAL'S SURNAME | FIRST PERSONAL NAME | ADDITIONAL NAME(S)/INITIAL(S) | SUFFIX      |
|                         |                          |                     |                               |             |
| 3c. MAILING ADDRESS     |                          | CITY                | STATE                         | POSTAL CODE |
| P. O. Box 961293        |                          | Fort Worth          | TX                            | 76161-0293  |
|                         |                          |                     | COUNTRY                       | USA         |

4. COLLATERAL: This financing statement covers the following collateral:

This is a public notice that Dwight Lucas authorized representative of DWIGHT LUCAS has external interest in the property as described: 7916 Bay Spring Road, Columbia, SC 29223; as recorded on April 5, 2002 in the Office of the Register of Deeds for Richland County in Record Book 00647 at Page 1645. Also a Quit-Claim Deed from DWIGHT LUCAS to ALICE MARIE FELDER-LUCAS and DWIGHT LUCAS dated April 24, 2003, Recorded May 30, 2003 in the Office of the Register of Deeds for Richland County in Record Book 00800 at Page 2863. Also a One-Half Interest Deed from DWIGHT LUCAS to ALICE LUCAS Recorded on December 30, 2004 in the Office of the Register of Deeds for Richland County in Record Book 01010 at Page 3379. Also a One-Half Interest Deed from ALICE LUCAS aka ALICE MARIE FELDER-LUCAS to DWIGHT LUCAS dated February 8, 2005, Recorded herewith in the Office of the Register of Deeds for Richland County, South Carolina.

TMS# 17013-02-06

Property Address: 7916 Bay Springs Road, Columbia, SC 29223

5. Check only if applicable and check only one box: Collateral is ☐ held in a Trust (see UCC1Ad, Item 17 and Instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

☐ Public-Finance Transaction ☐ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box:

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☒ Bailee/Bailor ☐ Licensee/Licenser

8. OPTIONAL FILER REFERENCE DATA:

By: *Ally*

Appellant's Exhibits 3

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Bill of Exchange

EXHIBIT – '3'

Bill of Exchange

Invoice No: DL001

Registered Mail # RR 663 048 156 US

Jacob Lew  
Department of the Treasury  
1500 Pennsylvania Ave., NW  
Washington, DC 20220

**Non-Negotiable**

**Re: Currency Exchange in Accord with Public Policy**

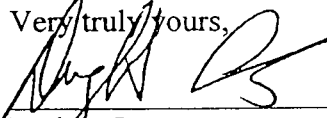
Attention: Jacob Lew, Respondent

Enclosed, the Undersigned, Dwight Lucas, herewith accepts for value the enclosed presentments and all related endorsements front and back, in accordance with Accommodation, Public Policy and UCC @1-104 and 10-104. Charge the Undersigned's Treasury Account Employer Identification Number for appropriate registration fees and command the Memory of account 355542934 to charge the same to the Debtor's Order, or to Respondent's Order.

The total amount of this Non-Negotiable Bill of Exchange in the enclosed filing is \_\_\_\_\_ . Please adjust the Undersigned's Treasury Account forthwith.

In the event Respondent requires further information or assistance from the Undersigned, please write to the Undersigned at the mailing location provided herein and herewith. Until then I am.....

Very truly yours,

  
Dwight Lucas  
c/o 7916 Bay Spring Rd.  
Columbia, SC 29223  
Employer ID# 35-5542934



**COPY**

**Non-Negotiable  
Charge back**

Invoice #DW001  
Date 02/24/14

**Jacob Lew**  
1500 Pennsylvania Ave., NW  
Washington, DC 20220

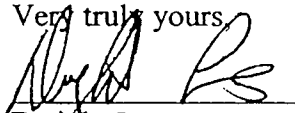
Dear Mr. Lew,

I accept for value all related endorsements in accordance with Accommodation and Public Policy. Charge my Treasury Account Employer Identification Number 35-5542934 for the registration fees and command the memory of account 355542934 and charge the same to the debtor's Order, or your Order.

The total amount of this Non-Negotiable Acceptance for Value in the enclosed filing is \_\_\_\_\_.

Thank you for your help in this matter. If assistance is needed, please feel free to contact me. Until then I am...

Very truly yours,



Dwight Lucas  
c/o 7916 Bay Spring Rd.  
Columbia, SC 29223

Registered Mail # RR 663 048 156 US  
**Pre-Paid – Preferred Stock**  
**Priority – Exempt from Levy**

Encl: Currency Exchange  
Bill of Exchange with 1040-ES Attached  
Collateral copy  
cc: file, collateral



**COPY**

Date: 02/24/14

Invoice # DW001

Registered Mail # RR 663 048 156 US

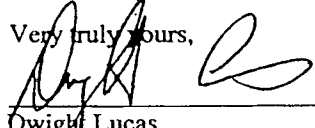
**Non-Negotiable Bill of Exchange**  
Account # 355542934

Re: "Non-Negotiable Acceptance of Inconsideration and Request Inconsolation in Accord with UCC 3-419 and HJR-192 of 5 June 1933, and Registered Adjustment of Account:

COLLATERAL: Summons, Citation, Complaint, AFV Document

Value of Bill: \_\_\_\_\_ The Undersigned accepts for value (all endorsements/considerations front and back and includes those in accord with UCC 3-419) as evidence with the herein Bill of Exchange to UCC Contract Account numbered 355542934, in the amount listed above, and is part of the Undersigned's tax estimate for use by the Republic, and the account is charged for the fees necessary for securing and registration (for the priority exchange for the tax exemption to discharge the public liability is accord with HJR-192 of 5 June 1933) of the Undersigned's (preferred stock/unalienable) rights. The Undersigned directs commanding the memory of account numbered 355542934 charging the same to the debtor's order or the Secretary of the Treasury's order. Until then I am...

Very truly yours,

  
Dwight Lucas  
c/o 7916 Bay Spring Rd.  
Columbia, SC 29223

c- Jacob Lew  
file  
collateral

.....  
Please detach

.....  
Please detach

**STUB**

**STUB**

Return to: Dwight Lucas  
c/o 7916 Bay Spring Rd.  
Columbia, SC 29223

Date: 02/24/14

Registered Mail # RR 663 048 156 US

Collateral: Summons, Citation, Complaint, AFV Document

Value of Bill: \$ \_\_\_\_\_

Invoice #DW001

Account # 355542934

**STUB**

**STUB**

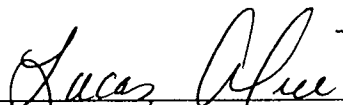


**COPY**

Certificate of Appellant

The undersigned hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

January 23, 2015

/s/   
\_\_\_\_\_  
Lucas, Alice UCC 1-308  
7916 Bay Spring Road  
Columbia, SC 29223

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEALS FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-In-Equity

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Case No. 2010-CP-40-0657

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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.;

Appellant.

Appellant Case No. 2014-000747

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PROOF OF SERVICE

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I certify that I have served the Record on Appeal on HSBC Mortgage Service Inc, by depositing a copy of it in the United States Mail, postage prepaid, on February 23, 2015, addressed to the attorney of record, Rebecca K. Lindahl and Richard L. Farley, 550 South Tryon Street, Suite 2900, Charlotte, North Carolina 28202.

February 23, 2015

s/ Alice Lucas  
Lucas, Alice  
7916 Bay Springs Road  
Columbia, South Carolina 29223  
(803) 312-2107  
Pro Se

**RECEIVED**

FEB 23 2015

**SC Court of Appeals**