

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
IN THE SUPREME COURT
APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS
CHARLIES B. SIMMONS JR.
MASTER IN EQUITY

CASE NUMBER 29-CP-23-1297

DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE OF POPULAR ABS, INC.
MORTGAGE PASS-THROUGH CERTIFICATES
SERIES 2007-A

RESPONDENT

V.

SHARON D. VAUGHAN

APPELLANT

APPELLANT CASE NUMBER 2012-211936

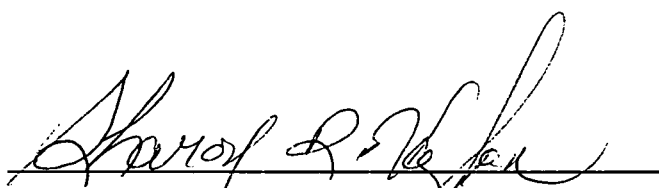
REPLY TO RESPONDENTS , INITIAL BRIEF

REPLY, BY APPELLANT.

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SC Court of Appeals


November 19, 2012

SHARON D. VAUGHAN

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(APPELLANT) (PRO-SE)

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LAW FIRM, JASEN D. WYMAN,

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(RESPONDENT)

PROOF OF SERVICE

ATTACHED:

TABLE OF CONTENTS

TABLE OF AUTHORITIES	iii
STATEMENT OF ISSUES	
ON APPEAL	1-3
STATEMENT OF CASE	4-5
FACTS	6-18
ARGUMENTS	19-20

(1) THE LOWER COURTS ERROR IN NOT ADDRESSING THE ISSUE, BROUGHT FORTH IN MOTIONS, PLEADINGS BY DEFENDANT, APPELLANT
ROGERS TOWNSEND THOMAS, LAW FIRM FAILURE TO SHOW PROOF OF ANY DOCUMENTS OF WHO THEY REPRESENT. NO DIRECT DOCUMENTS FROM PLAINTIFF.

(2) THE LOWER COURTS ERROR IN GRANTING SUMMARY JUDGEMENT.
APPELLANT HAS MORE THAN SHOWN AND PROVED AS FACT THAT THERE IS GENUINE ISSUE FOR TRIAL.
ERROR BY THE LOWER COURT , SUMMARY JUDGEMENT SHOULD HAVE BEEN DENIED.

CONCLUSION

P. 21-22

TABLE OF AUTHORITIES

MARSHALL V, MARSHALL

282-SC 534,538-39 320S.E. 2D,

44, 47, CT APP. 1984 P, 1 , 19, 21

STATUTES & RULES, OTHER AUTHORITIES

RULE (26) CIVIL JUDICIAL PROCEDURE AND RULES

RULES OF DISCOVERY P. 1 THRU 22

RULE (56) SUMMARY JUDGEMENT P. 1, 6, (15)(16)

21, 22,

RULE 56,

FREDERICK HART & CO, INC V. RECORDGRAPH CORP 169, F.2D, 580

(3 CIR 1948)

KOLTON V. HALPERN 260 F. 2D, 590 , 3 CIR 1958,

1989 CIVIL JUDICIAL PROCEDURE AND RULES, WEST, PUBLISHING.

STATUTES OF S.C. SUPREME COURT ORDER NO.

ORDER NO. 2009-05-22-01

ORDER NO. 2011-05-02-01 PAGES, 2, 6, 7, 12, 17,
18, 19, 20

REPLY TO RESPONDENTS STATE OF ISSUES BY APPELLANT

1. APPELLANT STANDS BY INITIAL BRIEF STATEMENT OF ISSUES.

2. THE LOWER COURT, FAILURE TO ADDRESS THE ISSUE UNDER
MARSHALL V. MARSHALL.

CONSIDERING ALL OF MY ANSWERS TO THE COURT STARTING IN
MARCH 24,2009, ANSWER OF FORECLOSURE , ALL MOTIONS, PLEADINGS,
TO THE COURT REQUESTING THE COURT ADDRESS THIS ISSUE, THE
LOWER COURTS ERROR IN REFUSING TO ADDRESS MY MOTIONS TO THE
COURT, MARSHALL V. MARSHALL, 282 SC 534,538-39 320 S.E. 2D, 44,47
CT.APP.1984 .

3. DID THE LOWER COURTS ERROR IN GRANTING SUMMARY JUDGEMENT
IN WHICH RESPONDENT HAS FAILED TO PRODUCE ANY TRUTHFUL
DOCUMENTS OF (PROOF THERE OF) COPIES LEFT IN A FILE , ILLEGALLY
ACQUIRED BY A COLLECTION AGENCY, DOES NOT CONSTITUTE TRUE
DOCUMENTS, IN WHICH THIS COLLECTION AGENCYS NAME DOES NOT
APPEAR IN ANY COURT DOCUMENTS , ROGERS, TOWNSEND, THOMAS,
LAW FIRM FILED WITH THE COURT, (NOT ONE DOCUMENT).

4. APPELLANTS ISSUE, TO THE COURT , THEN SUMMARY JUDGEMENT
SHOULD HAVE BEEN DENIED UNDER RULE 56, IN WHICH THEY HAVE
NEVER PRODUCED ANY DOCUMENTS OF PROOF THERE OF : THE
CURRENT OWNER, THE CURRENT HOLDER OF THE NOTE. FAILURE BY
THE LOWER COURT,

ROGERS TOWNSEND THOMAS, LAW FIRM , DOES NOT HAVE OR DO THEY
HOLD THE TRUE NOTE . (A COPY LEFT IN A FILE BY A LENDER THAT IS NO
LONGER IN BUSINESS, DOES NOT LEGALLY CONSTITUTE THE TRUE NOTE.

THE LOWER COURTS, FAILURE AND ERROR, UNDER SOUTH CAROLINA
SUPREME COURT, SET FORTH IN ORDER BY THE HONORABLE CHIEF JUSTICE
JEAN H. TOAL.

SOUTH CAROLINA ORDER NUMBER : 2009-05-22-01

SOUTH CAROLINA ORDER NUMBER : 2011-05-02-01 ,

THE LOWER COURT, WOULD BE IN NON-COMPLIANCE OF SAID ORDERS.

ROGERS TOWNSEND THOMAS, LAW FIRM, WOULD BE IN NON-COMPLIANCE
AND FAILURE TO PRODUCE UNDER (2) MORTGAGEE , YOU MUST TURN
OVER THE DOCUMENTS TO INCLUDE THE CURRENT OWNER, THE CURRENT
HOLDER OF THE NOTE AND MORTGAGE,
RESPONDENTS FAILURE TO COMPLY WITH SAID ORDERS.

APPELLANT HAS MORE THAN SHOWN AND PROVED TO THE COURT

GENUINE ISSUE FOR TRIAL.

APPELLANT STANDS BY INITIAL BRIEF.

APPELLANTS REPLY TO RESPONDENTS , STATEMENT OF THE CASE

APPELLANT STANDS BY THE INITIAL BRIEF , STATEMENT OF THE CASE

APPELLANT HAS FILED.

ROGERS TOWNSEND THOMAS, LAW FIRM , (MR. ROBERT DAVIS)

ON OCTOBER 6,,2010 , IN A FORECLOSURE HEARING HELD ON OCTOBER 6, 2010,

IN WHICH MR. DAVIS, WITH ROGERS TOWNSEND THOMAS LAW FIRM,

PROCEDES, WITHOUT PRIOR NOTIFICATION , IN ASKING THE COURT FOR A

POSTPONMENT , IN STATING HE NEEDED TIME TO ASQUIRE DOCUMENTS, HIS

REFUSAL TO ANSWER TO DEFENDANT, SHARON D. VAUGHAN (PRO-SE) WHAT

DOCUMENTS HE NEEDED TIME TO ACQUIRE.

ERROR BY THE LOWER COURT IN NEVER ASKING MR. DAVIS , WITH SAID

LAW FIRM , WHAT DOCUMENT HE NEEDED TIME TO RETREIVE,

DEFENDANT, APPELLANTS, ANSWER IN COURT WAS NO,

(THIS WAS REMOVED FROM THE TRANSCRIPT

THE QUESTION BECOMES WHY?

MR. DAVIS WAS GRANTED AN OPEN POSTPONMENT WITH NO TIME LIMIT

PUT ON THIS LAW FIRM FROM OCTOBER 6, 2010 UNTIL APRIL 16, 2012

THE COURT ERRED IN ABUSING ITS DISCRETION UNDER THE CIVIL
PROCEDURE ACT

THE COURT ERRED IN ITS ERRONEOUS APPLICATION OF THE LAW

THE COURT S ERROR IN DENEYING DEFENDANT, APPELLANT (PRO-SE),
UNDER MOTION FOR DISCOVERY (RULE 26)

APPELLANT STANDS BY APPELLANTS STATEMENT OF THE CASE.

APPELLANTS REPLY TO RESPONDENTS STATEMENT OF FACT

APPELLANT SHARON D. VAUGHAN, (PRO-SE) FILED NOTICE OF APPEAL

DATE MAY4, 2012, .

APPELLANT, SHARON D. VAUGHAN STANDS BY MY INITIAL BRIEF,

STATEMENT OF THE CASE, FACT OF THE CASE.

1. ERROR BY THE LOWER COURT, JUDGE CHARLES B. SIMMONS, IN GRANTING SUMMARY JUDGEMENT, UNDER SERIOUS ERROR OF NO DOCUMENTS OF PROOF THERE OF BY ROGERS TOWNSEND, THOMAS LAW FIRM, MR. DAVIS FILING A FRAULENT FORECLOSURE AND \ FRAULENT DOCUMENTS, PRESENTING NO PROOF THERE OF TO THE COURT,

STATEMENT OF FACT APPELLANT HAS SHOWN AND PROVED AS FACT.

RESPONDANTS, FAILURE IN REFUSING TO TURN OVER EVEN THE BASIC, INFORMATION, S.C. SUPREME COURT, ORDERED WOULD HAVE TO BE TURNED OVER, CURRENT OWNER, CURRENT HOLDER, WHERE IS THE TRUE NOTE .

THE SOUTH CAROLINA, SUPREME COURTS ORDERS OF 2009-05-22-01 ON MAY 22, 2009, COURT ISSUED AND ADMINISTRATIVE ORDER

THE SOUTH CAROLINA SUPREME COURT ORDER :

THE COURT ISSUED AN ADMINISTRATIVE ORDER SIGNED BY

CHIEF JUSTICE OF SOUTH CAROLINA SUPREME COURT,

CHIEF JUSTICE JEAN H, TOAL, ORDER : S.C. 2011-05-02-01, SIGNED MAY 2, 2011.

ROGERS TOWNSEND, THOMAS LAW FIRM, FAILURE AND NON COMPLIANCE

OF SAID ORDERS, THAT IF YOU ARE IN FAILURE OF ABIDING BY THESE
ORDERS,

UNDER (2) NO FORECLOSURE HEARING OR SUMMAY JUDGEMENT MAY MOVE
FORWARD IF ;MORTGAGEE OR ATTORNEY HAS NOT COMPLIED WITH THESE
ORDERS OR REQUIREMENTS,

(** ROGERS TOWNSEND THOMAS LAW FIRM , FAILURE TO COMPLY WITH
EVEN THE BASIC REQUIREMENTS, THE COURT WAS ORDERING, (NO PROOF
THERE OF FILED BY THIS LAW FIRM.

ERROR BY THE LOWER COURT IN REFUSING TO ADDRESS FRAULENT
FORECLOSURE DOCUMENTS FILED FEBUARY 18,2009, WITH NO PROOF THERE'
OF

ERROR BY THE COURT IN ALLOWING ADMISSIBILITY OF FRAULENT,
UNTRUTHFUL DOCUMENTS,

THE ERROR BY THE LOWER COURT, IN WHICH THE JUDGE'S REFUSING TO ADDRESS THE DEFENDANTS, APPELLANTS, MOTIONS, THE JUDGE'S FINDINGS NOT PROVEN BY DOCUMENTS OF ANY FACT WHAT SO EVER, THE RULING WOULD BE IN ERROR, AND FRAULENT STATEMENTS TO THE COURT BY ROGERS TOWNSEND THOMAS, LAW FIRM, WOULD BE (ERRONEOUS AND NOT SUPPORTED BY EVIDENCE.

ROGERS TOWNSEND THOMAS , REPEATED FALSE REMARK,OF APPELLANT FILING FRIVOLOUS DOCUMENTS, IS WITHOUT MERIT, AND BORDERS ON SLANDER.

APPELLANT , HAS THE LEGAL RIGHT TO DEMAND TO SEE ALL DOCUMENTS OF PROOF THERE OF , I HAVE STATED TO THE COURT AS FACT.

IN REPLY BY APPELLANT TO RESPONDANT STATING IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGEMENT.

UNDER (A) THE DEED OF THE PROPERTY

APPELLANTS ANSWER: RESPONDANTS REPEATED FALSE AND UNTRUTHFUL STATEMENTS TO THE COURT.

RESPONDANT , DOES NOT HAVE OR HOLD THE DEED OF THE PROPERTY.

THE RESPONDANT HAS A COPY OF A DEED, LEFT IN A FILE BY A LENDER, THAT IS NO LONGER IN BUSINESS, ACQUIRED IN AN ILLEGAL MANNER BY A COLLECTION AGENCY, IN WHICH THERE NAME DOES NOT APPEAR ON ANY DOCUMENTS FILED WITH THE COURT.

RESPONDANT , DOES NOT HOLD THE TRUE DEED TO THE PROPERTY.*****

NO PROOF THERE OF ORIGINAL AND TRUE DEED. (FRAULENT STATEMENT BY RESPONDANT).

UNDER (B) THE PROMISSORY NOTE

ANSWER BY APPELLANT....

RESPONDANT DOES NOT HAVE OR HOLD THE TRUE PROMISSORY NOTE THE TRUE NOTE ON MORTGAGE.

- A COPY LEFT IN A FILE DOES NOT CONSTITUTE THE TRUE NOTE , THE NOTE ITSELF, NOT A COPY.

A PROMISSORY NOTE IS A NEGOTIABLE INSTRUMENT, THE SAME AS A SIGNED CHECK, (NO PROOF OF DEPOSIT TO A TRUST ACCOUNT OF THIS LAW FIRM, WOULD CONSTITUTE PERJURY TO THE COURT.

THEY DO NOT HOLD THE PROMISSORY NOTE, THE TRUE NOTE ON APPELLANTS MORTGAGE. (NO PROOF THERE OF) THE CURRENT OWNER, THE CURRENT HOLDER OF THE NOTE.

FACT OF APPELLANTS STATEMENT, IF THEY HAD BEEN HOLDING THE NOTE TRUE NOTE ON MORTGAGE, THIS LAW FIRM COULD HAVE SHOWN WHO THE CURRENT OWNER, AND CURRENT HOLDER WAS ON THIS NOTE.

FRAULENT STATEMENT TO THE COURT BY RESPONDANTS.

ON APRIL 16, 2012, APPELLANT CALLED THE NOTE IN COURT, IN WHICH ALL RESPONDANTS, COULD SHOW WAS A COPY LEFT ON FILE BY A LENDER.

THERE FAILURE TO PRODUCE THE TRUE NOTE TO THE COURT, AND DEFENDANT, APPELLANT, WOULD BE CONSIDERED PERJURY TO THE COURT, IN FILING FALSE DOCUMENTS, AND FALSE STATEMENTS TO THE COURT.

UNDER (C) THE MORTGAGE AGREEMENT AND ASSIGNMENT.

ANSWER BY APPELLANT:

(1 EQUITY ONE IS THE ONLY NAME ON MY MORTGAGE NOTE AGREEMENT,

(2) UNDER MORTGAGE AGREEMENT UNDER (3) X, NO ASSIGNMENT HAD BEEN DESIGNATED, , MORTGAGE ELECTRONIC REGISTRATION SYSTEMS

IS NOT ON MORTGAGE NOTE TO AGREEMENT. . ONLY A ONE TIME TRANSFER

SOLY FOR EQUITY ONE, , THEY WERE NEVER GIVEN A 1,2,3, POSITION ON

MORTGAGE NOTE, OR AGREEMENT, EQUITY ONE, ONLY NAME ON MORTGAGE

RESPONDANTS , SUBMITTING FALSE AND FRAULENT DOCUMENTS, AND

FALSE STATEMENTS, TO THE COURT,

UNDER (D) AN AFFIDAVIT OF VERIFIED STATEMENT.

ANSWER BY APPELLANT,

ROGERS TOWNSEND THOMAS LAW FIRM, MR. ROBERT DAVIS ARRIVED IN

COURT ON APRIL 16, 2012 , WITH DOCUMENTS FROM A OCWEN COLLECTION

AGENCY.

THEY SUBMITTED FRAULENT FALSE DOCUMENTS TO THE COURT
WHICH CONSTITUTES PERJURY TO THE COURT, WITH FRAULENT INTENT.

;UNDER (D) (E)

OCWEN COLLECTION AGENCY NAME IS NOT ON ANY DOCUMENTS
APPEARING ON FORECLOSURE OR IN ANY DOCUMENTS THAT HAVE BEEN
SENT TO THE COURT, IN ANY MANNER.

THERE IS NO AMENMENT TO ANY FORCLOSURE COMPLAINT THERE NAME
DOES NOT APPEAR ON ANY DOCUMENTS.

*** THERE IS NO DOCUMENT THAT HAS BEEN FILED WITH THE COURT

OR TO APPELLANT, THAT WOULD GIVE THIS COLLECTION AGENCY THE
RIGHT ***** TO ATTACH ON TO COLLECT FROM A MORTGAGE NOTE
ON APPELLANTS HOME, (NOT ONE DOCUMENT OF PROOF THERE OF).

CURRENT OWNER, CURRENT HOLDER, WHERE THE NOTE IS ON APPELLANTS
HOME.

ROGERS TOWNSEND THOMAS, LAW FIRM, PRESENTING FRAULENT
FORECLOSURE, FRAULENT DOCUMENTS, TO THE COURT STARTING ON

FEBRUARY, 18, 2009 , UNTIL THE PRESENT DATE.

OCWEN COLLECTION ILLEGALLY ACQUIRING INFORMATION ON A MORTGAGE

AGREEMENT ON MY HOME, ,

ROGERS TOWNSEND THOMAS LAW FIRM, FAILING TO MAKE APPELLANT OR

THE COURT AWARE THEY WERE REPRESENTING A OCWEN COLLECTION,

WHICH IS WHO THEY ACTUALLY REPRESENT, THEY DO NOT REPRESENT,

PLAINTIFF OF FORECLOSURE, THIS IS THE FACT OF THIS CASE AS TO WHY

THEY CANNOT PRODUCE ANY DOCUMENTS DIRECTLY FROM DEUTSCHE

BANK NATIONAL TRUST.

VALIDATION OF DEBT OR DOCUMENTS, AFFIDAVIT OF VERIFIED STATEMENT

CONSTITUTES, (PERJURY TO THE COURT)

NO LEGAL DOCUMENTS, FROM A OCWEN THAT GIVES THEM THE RIGHT

TO ATTACH ON TO COLLECT FROM MORTGAGE NOTE,

NO CURRENT OWNER, NO CURRENT HOLDER,

THE QUESTIONS, BECOME WHO ARE THEY TRYING TO STEAL APPELLANTS

PROPERTY FOR, WITH NOT ONE DOCUMENT OF THE CURRENT OWNER

OR HOLDER OF THE NOTE,, WHO ARE THEY TRYING TO STEAL THIS PROPERTY

FOR, THEY ARE NOT REPRESENTING THE TRUE CURRENT OWNER AND
HOLDER OF THE NOTE, ...,

APPELLANT REPLY TO RESPONDANTS STANDARD OF REVIEW

APPELLANTS ANSWER AND CAUSE AS TO ALL OF THE DOCUMENTS

OF FACT , APPELLANT HAS FILED ON THIS APPEAL.

RESPONDANTS LACK AND FAILURE TO TURN OVER ANY DOCUMENTS OF

FACT, NO PROOF THERE OF , NOT ONE DOCUMENT OF FACT OF PROOF.

UNDER RULE 56, SUBDIVISION (E), THE WORDS ANSWERS TO INTERROGATORIES, ARE ADDED IN THE THIRD SENTENCE OF THIS SUBDIVISION TO CONFORM TO THE AMENDMENT OF SUBDIVISION ©, THE LAST TWO SENTENCES ARE ADDED TO OVERCOME A LINE OF CASES, CHIEFLY IN THE THIRD CIRCUIT WHICH HAS IMPAIRED THE UTILITY OF THE SUMMARY JUDGEMENT DEVICE. A TYPICAL CASE IS AS FOLLOWS, A PARTY SUPPORTS HIS MOTION FOR SUMMARY JUDGEMENT BY AFFIDAVITS OR OTHER EVIDENTIARY MATTER SUFFICIENT TO SHOW THAT THERE IS NO GENUINE ISSUE AS TO A MATERIAL FACT, THE ADVERSE PARTY , IN OPPOSING THE MOTION DOES NOT PRODUCE ANY EVIDENTIARY MATTER OR PRODUCES SOME BUT NOT ENOUGH TO ESTABLISH THAT THERE IS A GENUINE ISSUE FOR TRIAL, INSTEAD THE

ADVERSE PARTY REST ON AVERMENTS OF HIS PLEADINGS WHICH ON THEIR
FACE PRESENT AN ISSUE.

IN THIS SITUATION THE THIRD CIRCUIT CASES HAVE TAKEN THE VIEW THAT
SUMMARY JUDGEMENT MUST BE DENIED, IF THE AVERMENTS ARE WELL
PLEADED AND NOT SUPPOSITIOUS.

NOR IS THE AMENDMENT DESIGNED TO AFFECT THE ORDINARY STANDARDS
APPLICABLE TO THE SUMMARY JUDGEMENT MOTION.

WHERE AN ISSUE AS TO A MATERIAL FACT CANNOT BE RESOLVED WITHOUT
OBSERVATION OF THE Demeanor OF WITNESSES IN ORDER TO EVALUATE
THEIR CREDIBILITY, SUMMARY JUDGEMENT IS NOT APPROPRIATE, THERE
THE EVIDENTIARY MATTER IN SUPPORT OF THE MOTION DOES NOT ESTABLISH
THE ABSENCE OF GENUINE ISSUE, SUMMARY JUDGEMENT MUST BE DENIED
EVEN IF NO OPPOSING EVIDENTIARY MATTER IS PRESENTED
AND SUMMARY JUDGEMENT MAY BE INAPPROPRIATE WHERE THE PARTY
OPPOSING IT SHOWS UNDER SUBDIVISION (F) THAT HE CANNOT AT THE TIME

PRESENT FACTS ESSENTIAL TO JUSTIFY HIS OPPOSITION. .

APPELLANT HAS SHOWN FACTS, THAT RECONDANTS, HAD NO GENUINE DOCUMENTS OF PROOF THERE OF : TO ALL THE ISSUES I HAVE SUBMITTED TO THE COURT, INITIAL BRIEF, ALL DOCUMENTS FILED WITH THE LOWER COURT, SHOWING RESPONDANTS, FAILURE TO PRODUCE ANY DOCUMENTS UNDER RULE (56) SUMMARY JUDEMENT SHOULD BE DENIED.

ERROR BY THE LOWER COURT, UNDER SOUTH CAROLINA , SUPREME COURT ORDERS OF 2009-05-22-01 , UNDER SOUTH CAROLINA SUPREME COURT ORDERS OF 2011-05-02-01,

THE LOWER COURT , FAILURE IN COMPLYING WITH THE ORDERS SET FORTH BY THE SOUTH CAROLINA SUPREME COURT, THE LOWER COURTS ERROR IN IGNORING THESE ORDERS.

ERROR BY THE LOWER COURT, BY APPELLANTS, MOTIONS TO THE LOWER COURT, IN WHICH, HIS ERROR IN ALLOWING ROGERS TOWNSEND THOMAS LAW FIRM , TO CONTINUE TO SENT FRAULENT DOCUMENTS TO THE COURT, AND

THE COURT BEING FULLY AWARE THEY WERE FALSE.

ROGERS TOWNSEND THOMAS LAW FIRM BEING IN NONCOMPLIANCE AND
FAILURE OF SAID ORDERS BY THE SOUTH CAROLINA SUPREME COURT,
2009-05-22-01,,2011-05-02-01, SUMMARY JUDGEMENT SHOULD HAVE BEEN
DENIED.

FAILURE BY THE LOWER COURT, IN ERROR, OF ALLOWING THE
HOMEOWNER, DEFENDANT, APPELLANT, (PRO-SE) THE LEGAL RIGHT
EVERY HOMEOWNER, AND DEFENDANT WOULD HAVE UNDER CIVIL
PROCEDURES AND RULES
ERROR BY THE COURT UNDER RULE (26)

REPLY TO RESPONDENTS ARGUMENT BY APPELLANT

1. THE LOWER COURT MASTER IN EQUITY DID NOT CONCLUDE THAT ROGERS TOWNSEND THOMAS, LAW FIRM, REPRESENTED SAID PLAINTIFF ON FORECLOSURE.

FAILURE BY THE LOWER COURT IN ADDRESSING THE ISSUE IN WHICH THERE IS NO DIRECT, DOCUMENTS FROM (DEUTSCHE BANK) STATING THEY REPRESENT SAID PLAINTIFF.

FAILURE, ERROR, BY THE LOWER COURT, IN APPELLANT REQUESTING TO THE LOWER COURT, IN ALL MOTIONS, PLEADINGS, FILED WITH THE COURT.

FAILURE BY THE LOWER COURT IN NOT ADDRESSING THIS ISSUE ,DEFENDANT, APPELLANT, HAD REQUESTED OF THE COURT. MARSHALL V. MARSHALL.

2. ALL DOCUMENTS , ROGERS ,TOWNSEND, THOMAS HAS FILED WITH THE COURT ARE COPIES OF DOCUMENTS, ILLEGALLY SUBMITTED, FOR A OCWEN COLLECTION , OCWEN NAME DOES NOT APPEAR ON ANY DOCUMENTS, FILED IN THIS FORECLOSURE, THERE IS NO DOCUMENTS GIVING THEM THE RIGHT TO ATTACH ON AS A COLLECTION AGENCY TO MORTGAGE CONTRACT ON APPELLANTS MORTGAGE CONTRACT.
3. NO DOCUMENTS FROM DEUTSCHE BANK TO A ROGERS TOWNSEND THOMAS, LAW FIRM , DEUTSCHE BANK NATIONAL TRUST, HAS STATED DIRECTLY TO DEFENDANT, APPELLANT, SHARON D. VAUGHAN, THEY HAVE NOT FILED A FORECLOSURE ON SAID PROPERTY, 14 COTTINGHAM CIRCLE, GREENVILLE, S.C. , DEUTSCHE BANK HAS STATED DIRECTLY TO DEFENDANT, APPELLANT, THEY HAVE NOT RETAINED THIS LAW FIRM.
4. ERROR BY THE LOWER COURT IN NOT ADDRESSING AND REVIEWING ANY DOCUMENTS OF FACT FILED BY DEFENDANT, APPELLANT (PRO-SE)
5. RESPONDANTS, ROGERS TOWNSEND THOMAS LAW FIRM FALSE STATEMENT THEY PRESENTED THE ORIGINAL NOTE, THE PROMISSORY NOTE , THE TRUE NOTE ITSELF, CONSTITUTES, PERJURY ON THE PART OF THIS LAW FIRM.

THEY DO NOT HOLD THE TRUE NOTE ON APPELLANTS MORTGAGE, DEFENDANT CALLED THE NOTE IN COURT ON APRIL 16,2012, ALL THIS LAW FIRM COULD SHOW WAS A COPY ALWAYS LEFT IN A FILE BY A LENDER THAT IS NO LONGER IN BUSINESS.

A COPY LEFT IN A FILE BY A LENDER , THAT WAS ILLEGALLY ACQUIRED BY A OCWEN COLLECTION, DOES NOT CONSTITUTE THE TRUE NOTE.

6. FAILURE BY THE LOWER COURT, THE LOWER COURT WOULD BE IN NON- COMPLIANCE WITH THE ORDERS THAT WERE SET FORTH BY THE SOUTH CAROLINA SUPREME COURT ,
2009-05-22-01 , SOUTH CAROLINA SUPREME COURT ORDER OF MAY 2,2011
2011-05-02-01
FAILURE UNDER MORGAGEE:::::::::: YOU MUST TURN OVER THE CURRENT OWNER CURRENT HOLDER OF THE NOTE, WHERE THE CURRENT OWNER WOULD BE LOCATED.

(UNDER 3) OF 2011-05-02-01, NO SUMMARY JUDGEMENT OR FORECLOSURE MAY BE GRANTED IF YOU HAVE NOT COMPLIED WITH SAID ORDERS,

ROGERS TOWNSEND THOMAS LAW FIRM FILING , FALSE STATEMENT TO THE COURT THAT THEY HAD COMPLIED, WOULD CONSTITUTE, FALSE DOCUMENTS AND STATEMENTS TO THE COURT.

7. ERROR, AND FAILURE , BY THE LOWER COURT, IN NOT ADDRESSING THE FALSE DOCUMENTS, AND STATEMENTS, MADE TO THE COURT BY ROGERS TOWNSEND, THOMAS LAW FIRM, MR. ROBERT DAVIS.

ERROR BY THE LOWER COURT , MASTER IN EQUITY,
IN REFUSING TO ADDRESS DEFENDANTS, MOTION S THAT WERE FILED TO THE LOWER COURT , UNDER MORTGAGOR DENIED,,, MOTION TO DISMISS SUMMARY JUDGEMENT, DISMISS FORECLOSURE.

DO DOCUMENTS OF PROOF THERE OF BY ROGERS TOWNSEND THOMAS LAW FIRM FALSE DOCUMENTS, AND STATEMENTS SENT TO THE COURT BY SAID LAW FIRM.

APPELLANT STANDS BY THE INITIAL BRIEF, ARGUMENT.

REPLY CONCLUSION OF APPELLANT

APPELLANT STANDS BY CONCLUSION APPELLANT HAS STATED TO THE COURT.

ON APRIL 16, 2012, IN A SUMMARY JUDGEMENT HEARING, APPELLANT CALLED THE NOTE IN COURT, ROGERS TOWNSEND THOMAS LAW FIRM, SHOWS AND PRESENTS A COPY LEFT IN A FILE BY A LENDER THAT IS NO LONGER IN BUSINESS (EQUITY ONE)

THIS LAW FIRMS, DOES NOT REPRESENT DEUTSCHE BANK, THIS LAW FIRM REPRESENTS A COLLECTION AGENCY NAMED OCWEN, THAT ILLEGALLY ACQUIRED INFORMATION ON A MORTGAGE CONTRACT ON APPELLANTS HOME.

FACT: THEY CANNOT PRODUCE ANY DOCUMENTS, OF FACT, THE CURRENT OWNER THE CURRENT HOLDER, WHERE THE TRUE NOTE IS ON APPELLANTS HOME, THEY DO NOT HAVE THIS PROOF ARE INFORMATION,,

THIS LAW FIRM FILED FRAULENT FORECLOSURE ON APPELLANTS HOME, KNOWNLY, AND WILLFULLY IN FILING THIS FORECLOSURE, THEY WERE FILING FALSE DOCUMENTS, THAT CONSTITUTES PERJURY TO THE COURT.

APPELLANT IN REQUESTING THE SOUTH CAROLINA COURT OF APPEALS WOULD REQUIRE ROGERS TOWNSEND THOMAS, LAW FIRM TO PRODUCE THE:

TRUE NOTE INSELF, NOT A COPY, NOT A CERTIFIED COPY, APPELLANT HAS A LEGAL RIGHT TO HAVE THE TRUE NOTE, THE CURRENT OWNER OF THE NOTE, THE CURRENT HOLDER OF THE NOTE. CONTACT WITH THE CURRENT OWNER, AND HOLDER OF THE NOTE.

THE QUESTION BECOMES WHO IS ROGERS TOWNSEND THOMAS TRYING TO STEAL APPELLANTS PROPERTY FOR, THEY DO NOT REPRESENT DEUTSCHE BANK, THEY CANNOT PRODUCE ANY DOCUMENTS OF PROOF THERE OF, APPELLANT HAS STATED TO THE COURT AS FACT.

THE HOMEOWNER, DEFENDANT, APPELLANT, PRO-SE,,, SHARON D. VAUGHAN CAN ASSURE THE COURT, WHAT I HAVE SUBMITTED TO THE COURT, IN PROTECTING MY HOME FROM FRAULENT FORECLOSURE BEING FILED, AND IN PROTECTING MY LEGAL RIGHTS, AND CIVIL RIGHTS, FROM WHAT WOULD CONSTITUTE FRAUD, AND THEFT.

(21)

APPELLANT IS ASKING THE HONORABLE SOUTH CAROLINA COURT OF APPEALS TO .

1. REVERSE THE DECISION OF THE LOWER COURT, APPELLANT IS ASKING THE COURT, TO DENY SUMMARY JUDGEMENT, FOR THE FACTS APPELLANT HAS STATED TO THE COURT.
2. APPELLANT IS ASKING THE COURT TO DISMISS THE FORECLOSURE, ON THE GROUNDS , AND ERROR BY THE LOWER COURT NO PROOF THERE OF, ANY DOCUMENTS,
3. NO LEGAL DOCUMENTS , FROM ROGERS TOWNSEND THOMAS LAW FIRM , PRESENTED TO ATTACH ON TO COLLECT FROM MORTGAGE NOTE.

APPELLANT , PRAYS TO THE HONORABLE SOUTH CAROLINA COURT OF APPEALS FOR RELIEF IN THIS SERIOUS MATTER AND INJUSTICE.

SHARON D. VAUGHAN

November 19, 2012 Sharon D. Vaughan

14 COTTINGHAM CIRCLE
GREENVILLE, S.C. 29617-3421
864-325-9551

PROOF OF SERVICE ATTACHED
TO ROGERS TOWNSEND THOMAS
LAW FIRM, JASEN D. WYMAN

HOMEOWNER, DEFENDANT, APPELLANT
PRO-SE

11-19-2012

POSTAGE PAID, ON November 19, 2012,

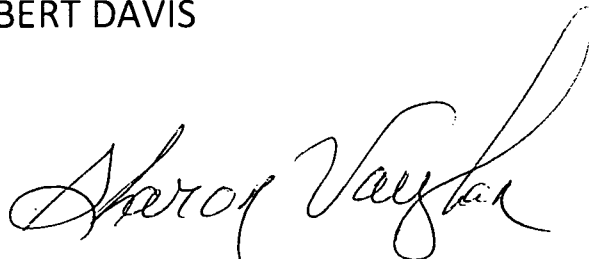
ADDRESSED TO ROGERS TOWNSEND THOMAS LAW FIRM,

220 EXECUTIVE CENTER DRIVE, P.O. BOX 100200 , COLUMBIA,

S.C. 29202-3200

TELEPHONE : 803-771-7900, \

MR. JASEN D. WYMAN, MR ROBERT DAVIS



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ORIGINAL TO

S.C. COURT OF APPEALS