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**The State of South Carolina
In the Court of Appeals**

Appeal from Spartanburg County

Court of Common Pleas

Gordon G. Cooper, Master in Equity

RECEIVED
AUG 09 2017
SC Court of Appeals

Case No. 2012-CP-42-3027

Appellate Case No. 2017-001238

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, and
United States of America, Defendants,
Of whom Geary Thomas Dooly is the Appellant.

INITIAL BRIEF OF APPELLANT

geary-thomas, Dooly, appellant, sui juris
c/o Post Office box 3326
Spartanburg, South Carolina [29304]
Phone (864) 978-3426

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Cases

Hanes v. Kerner 404 US.520, *Birt v Estelle* 660 F.2d 592.

United States v. Pewee Coal Co., 341 U.S. 115 (1951) The certificate of live birth equals, the State took possession and control over the birth event and denied one the right to exercise their own business judgment, thus the State became proprietor (holder of property as usufructuary) and entitled to all the benefits and subject to all the liabilities that status affords, that is, all revenues and debts are to accrue to the treasury.

Presbyterian Church v. St. Louis Union Trust Co. (1974), 18 Ill. App.3d 713 The "Certificate of Live Birth" evidences a rebuttable presumption that can be disproved by evidence showing the presumed dead is living.

Other Authorities

Cesti Que Vie Act of 1666 When the dead shows up living, the entire estate then re-vest automatically unto the one so identified as the dead for the dead is no longer dead, and

1 the personal appearance of the supposed or assumed dead man cures the condition and
2 revokes all letters of administration ab initio.

3 *Treaty of Paris* All United States citizens and inhabitants of the United States of
4 America are basically Crown subjects.

5 *Treaty of Ghent* There is to be a perpetual peace between united States of America and
6 England.

7 *1954 International Organization Immunities Act* All public officers are hereby
8 transferred to the UN – FARA registration required if one is claiming to be government.

9
10
11 **Statement of Issues in Response**
12

13 **1. Was there fraud, deception, and bad faith acts during action in subject case leading up**
14 **to and including the Hearing for Summary Judgment?**

15 **2. Did the Respondent fail to establish authority and jurisdiction to act on behalf of**
16 **Deutsche Bank National Trust Company?**

17 **3. Did Respondent fail to reply, answer, defend, or comply in a timely fashion with the**
18 **allegations presented in Appellant's Answer to Motion for Summary?**

19 **4. Did Judge Cooper focus the hearing on the erroneous statement of Counsel that the**
20 **points of Appellant's Answer to Motion for Summary Judgment "are just restatements of**
21 **the counterclaim already dismissed" [see Exhibit A page 9, lines 4 & 5 of hearing**
22 **transcript], when in fact they were NOT all "restatements"?**

23 **5. Did Judge Cooper act in bad faith by continuing the case after Appellant stated that he**
24 **was the living man [Exhibit C - Page 3, lines 8 & 9 of hearing transcript], which**
25 **proves that he, Geary Thomas Dooly, is not dead and he, Judge Cooper, has no right to**
26 **conduct a trial against a living man?**

27 **6. Did Judge Cooper, by the Appellant's statement immediately above, not know and**
28 **understand that he, Judge Cooper, is the Surety in this case and that the living man**
29 **standing before him is the Beneficiary?**

30 **7. Did Judge Cooper, by the statement of the Appellant referred to immediately above(#5**

31 **PAGE 2**

1 & 6), ignore, and pretend that he was NOT conducting a Military Court under a Military
flag posted in his courtroom, by ignoring the statement that is "on the court record"?

2 **8. Did Judge Cooper and the Attorney of record act in bad faith by ignoring, and failing to**
3 **answer or address a VERY critical issue as on the record of the court, namely,**
4 **Appellant's ANSWER TO MOTION FOR SUMMARY, most specifically Item 6. On**
5 **page 6 of Appellant's Answer as repeated in part here:[Exhibit B – Item 6-pgs 6 & 7]**
6 **"Item 6. Lack of Jurisdiction over geary-thomas: dooly, the living man**

7 I am geary-thomas:dooly, the living man on the soil of South Carolina. The land that I
8 live on is in the following names: geary-thomas; dooly, the living man, and eleanor-s.:
9 dooly, the living woman. It is published in the Spartan weekly News in two entries each
10 of April 7, 14, 21, 2016, namely "LEGAL NOTICE OF: QUIT CLAIM ON LAND", and
11 LEGAL NOTICE: CERTIFICATE OF ASSUMED NAME FOR A NON-PROFIT,
12 CHARITABLE ORGANIZATION, A SOLE PROPRIETORSHIP, A PARTNERSHIP,
13 A LIMITED PARTNERSHIP, AND OR TRUST". Therefore, there is no jurisdiction in a
14 Military Court under the Military Flag."

15 **9. Although the issue raised as immediately above was included as a counterclaim, is it**
16 **reasonable and just that someone as sui juris, not trained in law, would not know to**
17 **placed the issue, as addressed immediately above, under a separate heading, thus making**
18 **it a valid issue that the Respondent Attorney should have addressed rather than ignore?**

19 **10. Is it an act of bad faith for the Respondent Attorney to fail to respond the Appellant's**
20 **Answer stating facts re the counterclaims having been dismissed BUT addressing this**
21 **issue that was/is not a counterclaim but a fact of law?**

22 **11. Is the wording of the ruling by Court of Appeal nebulous, particularly to someone not**
23 **trained in law, in that, it clearly states that my appeal of 3 specific items is AFFIRMED,**
24 **and never once says denied, nor says explicitly what was AFFIRMED, therefore one**
25 **would deduce that the Appeal was AFFIRMED, yet there seems to be no rule as to how**
26 **rulings are stated?**

27 **12. Is there a serious need to fully document with proof to Judge Cooper, the Court, the**
28 **public, and all positions of government that geary-thomas: dooly is, in fact, a living man,**
29 **is NOT dead, is NOT the Surety in any case heretofore, hereto, or hereafter, and that the**
30 **false, and wrong assumption is invalid and of no effect since the assumed living man is**
31 **NOT dead, and is NOT any corporate, or commercial entity, but, in fact, is a living man**
on the soil of South Carolina?

Statement of the Case

1 This Case was initiated by what is called a "Foreclosure Mill" in Atlanta, Georgia,
2 namely "Johnson and Freedman, LLC"(Johnson) on or about July 19, 2012. Then case
3 was sold, transferred, or given to Nelson Mullins Riley & Scarborough LLP (Nelson).
4 Much later the Firm: Brock & Scott PLLC Westpark Center, 3800 Fernandina Road
5 Columbia, South Carolina adopted, bought, or acquired the Case, albeit with no authority
6 or request from the Plaintiff that has been presented by the firm to the Court Record. Thus
7 the firm is masquerading as the Plaintiff with no authority or jurisdiction. Throughout the
8 Case geary-thomas: dooly has presented many points in the Case that could not be
9 overcome in the light of justice, and therefore Plaintiff had to resort to manipulating the
10 Court, Rules, et al so as to have said points "dismissed", or avoided by ignoring defense
11 thereof. Ultimately, all the points of truth were buried, and Brock & Scott unjustly
12 obtained a Judgment via Gordon Cooper without either Brock & Scott or Judge Cooper
13 acknowledging that every time they had no jurisdiction or authority to bring this action
14 against the living man, geary-thomas: dooly. Now, the burden of proof is upon geary-
15 thomas: dooly to show proof to the lower court, the Court of Appeals, and the Attorneys
16 that geary-thomas: dooly is, in fact, a living man upon the soil of South Carolina.
17

Facts

18
19
20 1. The Appellant is not pro se, is not educated in law and is sui juris in all matters. The
21 Court is further noticed that, the Appellant/Defendant being sui juris, not educated in the
22 law, the Court must read and construe liberally all pleadings by Appellant/Defendant per
23 *Hanes v. Kerner 404 US 520, Birl v Estelle 660 F.2d 592.*

24 2. The Appellant is, as stated on the record during the hearing of May 16, 2017, "...I am
25 here on special appearance as the living man...", [**Exhibit C – Page 3 lines 8 & 9 of**
26 **Hearing transcript**] which should have been recognized by Judge Cooper and Judge
27 Cooper should have dismissed the case since his court cannot try a live man, but only a
28

1 corporate person that is dead just as any other corporation is dead. Judge cooper never
2 acknowledged the live man, thereby leaving a need to establish that fact on the record.

3 4 **Arguments**

5 . The primary matters before the appellate court are (1)the manipulation of the
6 Case by ignoring points made or skillfully having points dismissed. (2) the repeated
7 refusal of either of the State agents, namely Gordon Cooper and Attorneys of record to
8 recognize geary-thomas: dooly as the living man, albeit possible to do so by lack of
9 geary-thomas:dooly to bring that fact before the court in a manner that the Court would be
10 unable to elude. That must be done. All matters relevant.

11
12
13 1. Was there fraud, deception, and bad faith acts during action in subject case leading up
14 to and including the Hearing for Summary Judgment? **YES.** The Plaintiff was allowed to
15 not be required to file Appellant's answer to MOTION OF SUMMARY JUDGMENT by
16 accepting the statement from Attorney that filing was "only" a restatement of previous
17 counterclaims, whereas some were and some were not.

18 2. Did the Respondent fail to establish authority and jurisdiction to act on behalf of
19 Deutsche Bank National Trust Company? **YES.** Judge Cooper ignored any question as to
20 Respondent having authority from Deutsche Bank even though proof had been presented
21 that there was no such authority from Deutsche Bank.

22 3. Did Respondent fail to reply, answer, defend, or comply in a timely fashion with the
23 allegations presented in Appellant's Answer to Motion for Summary? **YES.** Judge
24 Cooper "shut me down with manipulation" as to the point.

25 4. Did Judge Cooper focus the hearing on the erroneous statement of Counsel that the
26 points of Appellant's Answer to Motion for Summary Judgment "are just restatements of
27 the same counterclaim already dismissed" [**Exhibit A -Page 9, lines 4 & 5 of hearing transcript**], when in fact they were NOT all "restatements"? **YES.** It is very obvious
28 from the transcript as noted.

29 5. Did Judge Cooper act in bad faith by continuing the case after Appellant stated that he
30 was the living man [**Exhibit C Page 3, lines 8, & 9 of hearing transcript**], which

1 proves that he, Geary Thomas Dooly, is not dead? **YES**. Judge Cooper, has no right to
2 conduct a trial against a living man, and knows that he, Judge Cooper, is, in fact, the
surety for the complaint wrongly presented to the live man.?

3 **6.** Did Judge Cooper, by the Appellant's statement immediately above, know and
4 understand that he, Judge Cooper, is the Surety in this case, and that the living man
5 standing before him is the Beneficiary? **YES**. Judge Cooper knows this well, and so
6 knowing, skillfully manipulates around the issue in attempt to transfer the surety wrongly
(but knowingly) to the living man before him.

7 **7.** Did Judge Cooper, by the statement of the Appellant referred to immediately above,
8 ignore, and pretend that he was NOT conducting a Military Court under a Military flag
9 posted in his courtroom, by ignoring the statement "on the court record"? **YES**. Judge
10 Cooper knows that the yellow fringe on a flag of different dimensions is not the united
States of America Flag but a Military Flag to show authority of the collective States.

11 **8.** Did Judge Cooper and the Attorney of record act in bad faith by ignoring, and failing to
12 answer or address a VERY critical issue as on the record of the court, namely,
13 Appellant's ANSWER TO MOTION FOR SUMMARY JUDGMENT, most specifically
14 Item 6, on page 6 of Appellant's Answer to respondents Motion for Summary Judgment
as repeated in part here: **[Exhibit B - Item 6-pgs 6 & 7]**

15 **"6. Lack of Jurisdiction over geary-thomas: dooly, the living man**

16 I am geary-thomas:dooly, the living man on the soil of South Carolina. The land that I
17 live on is in the following names: geary-thomas; dooly, the living man, and eleanor-s.:
18 dooly, the living woman. It is published in the Spartan weekly News via two entries each
19 of April 7, 14, 21, 2016, namely #1 "LEGAL NOTICE OF: QUIT CLAIM ON LAND",
20 and, #2 "LEGAL NOTICE: CERTIFICATE OF ASSUMED NAME FOR A NON-
PROFIT, CHARITABLE ORGANIZATION, A SOLE PROPRIETORSHIP, A
21 PARTNERSHIP, A LIMITED PARTNERSHIP, AND OR TRUST". Therefore, there is
22 no jurisdiction in a Military Court under the Military Flag." **YES, very bad faith.**

23 **9.** Although the issue raised as immediately above was included as a counterclaim, is it
24 reasonable and just that someone as sui juris, not trained in law, would not know to
25 placed the issue, as addressed immediately above, under a separate heading, thus making
26 it a valid issue that the Respondent Attorney should have addressed rather than ignore?
27 **YES**, but since the two State agents goal is money and not justice, it is in the best
28 financial interest to just pass it over with a wink in spite of justice.

29 **10.** Is it an act of bad faith for the Respondent Attorney to fail to respond the Appellant's
30 Answer stating facts re the counterclaims having been dismissed BUT addressing this
31 issue that was/is not a counterclaim but a fact of law? **YES**, but if the non-counterclaim

1 issue is addressed in good faith and justice, the Respondent would end (lose) the Case
2 wherein she was masquerading as the Bank Plaintiff with no authority.

3 11. Is the wording of the ruling by Court of Appeal nebulous, particularly to someone not
4 trained in law, in that, it clearly states that my appeal of 3 specific items is AFFIRMED,
5 and never once says denied, nor says explicitly what was AFFIRMED, therefore one
6 would deduce that the Appeal was AFFIRMED yet there seems to be no rule as to how
7 rulings are stated? YES, the wording is very misleading to a man not trained in the law
8 and manipulative word usage. Appellant had appealed to the Court certain issues, for
9 example, saying that Judge Cooper had no jurisdiction, then the Court makes a one word
10 ruling AFFIRMED. This certainly says that the Court is affirming my issue that Judge
11 Cooper has no jurisdiction. It seems that the Court would say DENIED to an issue, and
12 therefore, we AFFIRM the ruling of Judge Cooper. Question in point: How would you
13 word your ruling if two of the three issues you agreed with, but one, you did not agree
14 with?

15 12. Is there a serious need to fully document with proof to Judge Cooper, the Court, the
16 public, and all positions of government that geary-thomas: dooly is, in fact, a living man,
17 is NOT dead, is NOT the Surety in any case heretofore, hereto, or hereafter, and that the
18 false, and wrong assumption is invalid and of no effect since the living man is NOT dead
19 as assumed, and is NOT any corporate, or commercial entity, but a living man on the soil
20 of South Carolina? YES, a very serious need to fully document lawfully, and rightfully
21 that geary-thomas: dooly is, in fact, a living man and that the presumption that he is dead,
22 and exist only as a dead entity, much like a dead corporation, is wrong. *Presbyterian
23 Church v. St. Louis Union Trust Co. (1974), 18 Ill. App.3d 713* The "Certificate of Live
24 Birth" evidences a rebuttable presumption that can be disproved by evidence showing the
25 presumed dead is living.

26 CONCLUSION

27 In accord with arguments presented herein this Appeals Court should reverse the
28 ruling of Judge Cooper, and more importantly, dismiss this case in its entirety
29 immediately, since there is no need to waste additional court time and cost on a case that
30 has no merit, no foundation, and no jurisdiction. Furthermore, the case could be said to be
31 operating outside the law currently.

The living man, geary-thomas: dooly operates in peace and harmony with our
Father the Creator God, and has no desire to impose any kind of fine or penalty upon

1 Judge Cooper, or the Attorneys. Yes, I have been harmed, but not injured; therefore, I
2 request dismissal in total of this case, barring others for repeating such harm.

3 Respectfully submitted,

4 August 7, 2017

5 geary-thomas: Dooly
6 the living man, appellant, sui juris
7 c/o: Post Office Box 3326
8 Spartanburg, South Carolina [29304]
9 Phone (864) 978-3426

10 *geary-thomas: Dooly the living*
11 *man*

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CERTIFICATE OF SERVICE

I, Geary-Thomas: Dooly, hereby certify that a copy of the following documents have been mailed on or before this date via USPS with proper postage to each party listed below:

DOCUMENTS

- 1. INITIAL BRIEF OF APPELLANT WITH EXHIBITS
- 2. DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL – Form 14.

PARTY(IES)

BROCK & SCOTT PLLC
 Attn: Genevieve S. Johnson, SC Bar No. 78480
 Westpark Center
 3800 Fernandina Road, Suite 110
 Columbia, South Carolina 29210

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

Date: August 7, 2017

geary-thomas: Dooly
 the living man, appellant, sui juris
 c/o: Post Office Box 3326
 Spartanburg, South Carolina [29304]
 Phone (864) 978-3426

geary-thomas: Dooly, the living man

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1 MR. DOOLY: These counterclaims are a new submission as of April 6, I
2 believe it was, and it must be addressed by the Plaintiff.

3 THE COURT: Counsel?

4 MS. JOHNSON: Your Honor, I would assert that they are just restatements
5 of the same counterclaim already dismissed by the Court, and even if they were
6 not, they are not timely filed under the Rules of Civil Procedure for South
7 Carolina. They would have needed to be filed years ago before the Answer time
8 expired. There has been no Order of this Court allowing any additional filings.
9 The Court has expressly said the opposite. No additional filings. Counterclaims
10 have been dismissed.

11 THE COURT: Okay.

12 MR. DOOLY: Again, I move this Court dismiss this case with prejudice
13 based on the various things I've outlined that were not answered in my
14 counterclaim.

15 THE COURT: All right. Counsel, anything further?

16 MS. JOHNSON: Your Honor, really nothing further. The counterclaims
17 have been dismissed by the Court. Any additional filings are not timely at this
18 point. Based on the pleadings, exhibits, Affidavits and submissions we've made,
19 we have properly proved our case and we are entitled to summary judgment at this
20 time. We've met our initial burden of proof. They've come forward with no other
21 specific facts or issues. There is nothing remaining for trial and I think summary
22 judgment is proper at this time.

23 THE COURT: All right. I'm going to deny the motion for dismissal of the
24 case. I'm going to grant the motion for summary judgment based on the pleadings
25 in this case based on the appeal as far as the affirmation of my original Order back

Federal Court prosecution. FINALLY, Mr. John L. O'Brien, Jr Register of Deeds of Southern Essex District, Salem Massachusetts stated in his cover letter with his AFFIDAVITS re "the four robo signers" as follows: If you [Alleged Defendant] are currently being foreclosed upon, this AFFIDAVIT may be presented to your attorney, the lender, or the court to show that your chain of title has been corrupted." This statement is part of the above mentioned [See Exhibit # 5] , and Alleged Defendant hereby presents said AFFIDAVITS to the court, and Plaintiff. This Case has no standing without proof that Mr. O'Brien testimony is untrue wherein he would be, in his words, "October 3, 2012, under the pains and penalty of perjury." Alleged Defendant is aware that in other cases, it has been ruled that one cannot question a document to which he is not a party, however, in instant case and instant questioning, the document does contain the named Alleged Defendant, and the questioning does relate to fraud upon the court of using a document that was sworn by affidavit to be corrupt by the Officer of Record of Deeds. Therefore , it is left to the Plaintiff to prove validity of the Assignment Document.

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SPRINGFIELD COUNTY
2017 APR -6 AM 9:58
MASHOPE BLACKLEY

6. Lack Of Jurisdiction over geary-thomas: dooly, the living man

LACK OF JURISDICTION of Master-in-Equity has been AFFIRMED by the South Carolina Court of Appeals via their Order re Alleged Defendant's Appeal [See Exhibit # 1]. I am geary-thomas: dooly, the living man on the soil of South Carolina. The land that I live on is in the following names: geary-thomas: dooly, the living man, and eleanor-s.: dooly, the living woman. It is published in the Spartan Weekly News in two entries each of April 7,14, & 21, 2016, namely "LEGAL NOTICE: NOTICE OF: QUIT CLAIM ON LAND", and "LEGAL NOTICE: CERTIFICATE OF ASSUMED NAME

FOR A NON-PROFIT, CHARITABLE ORGANIZATION, A SOLE PROPRIETORSHIP, A PARTNERSHIP, A LIMITED PARTNERSHIP, AND OR TRUST".

Therefore, there is no jurisdiction in a Military Court conducted under the Military Flag. Discussions of claims, complaints, or any matter would need to be done in Chancery Court which, I believe, is held in Judges Quarters without an Attorney representing either party.

7. There is no evidence of account and general ledger statement(s) showing full accounting of the alleged obligation that Plaintiff is attempting to collect, or that Plaintiff actually loaned their own money versus lending their credit. NOTE: It has been fully established by Case Law that banks cannot lend their credit. [See Exhibit # 6] for some 25 such case law citings in support of same].

Evidence necessary to resolve and prove the validity and source of funds of Plaintiff's alleged loan would include, as previously demanded:

- a) FR 2046 balance sheet (OMB #s 2046, 2049, 2099, and
- b) FAS 95 Cash Flow Statements, and
- c) 1099 OID report, and
- d) CUSIP number(s), and
- e) SEC Registration # of the pooled trust, and
- f) FWP (free Writing Prospectus)

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CLERK OF COURT
SPRINGFIELD COUNTY
2017 APR -6 AM 9:58
M. HOPE BLACKLEY

1 Sixty-eight cents (\$212,767.68).

2 THE COURT: And the basis for your motion, Counsel?

3 MS. JOHNSON: Your Honor, our motion is supported by an Affidavit of
4 Indebtedness signed by our client. They are the holder of the note and mortgage
5 executed by Mr. Dooly on this property.

6 THE COURT: All right. Mr. Dooly?

7 MR. DOOLY: My objection, Your Honor, is this person has no jurisdiction
8 and no authority exercised in this case today and I am here on special appearance
9 as the living man speaking for -- trying to preserve the property that is unjustly
10 being tried to take from me that I live on and I have--- This person is also in
11 default. I have entered a--- I answered their motion for this hearing. I answered
12 it with a counterclaim that, according to 12(a) of the Rules of South Carolina, a
13 counterclaim must be answered and it must be answered within thirty (30) days and
14 this one has not been answered. As a counterclaim, I actually become the Plaintiff,
15 as you know, in that particular document and that one was not addressed within the
16 thirty (30) days. So, everything in that counterclaim is null and -- is valid and
17 without ability for the Plaintiff to defend it and this hearing should not be
18 occurring. I talked with the Plaintiff's representative here, Ms. Johnson, and she
19 said this meeting was going to go on anyway even though she had not done it. She
20 had already violated the court or misused the court by stating in a previous filing
21 that the appeal that I did before the Appellate Court of South Carolina was denied
22 and it was not denied. It was affirmed in total and three different things that they
23 named in that which I named in my document were identified, one of which was
24 the counterclaims had to be heard and they still have to be heard and answered by
25 the Plaintiff if that Plaintiff can establish any authority and the first thing they

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

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

August 7, 2017

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SC Court of Appeals

Re: Deutsche Bank v. Geary Thomas Dooly
Appellate Case No. 2017-001238

Attn: V. Claire Allen, Deputy Clerk

Thank you for your recent letter dated July 28, 2017, re "deficiencies on Initial Brief and Designation of Matter captions/title".

My apology to the Court for these over sites, and I appreciate your kind letter and patience.

Both the corrected Initial Brief, and the corrected Designation of Matter are enclosed with the corrections noted by you.

If more convenient, you may respond via phone 864-978-3426, voice mail, or text, or via e-mail at tdooly7@aol.com.

Best regards,
Geary Thomas Dooly

Geary-Thomas: Dooly, the living man

cc: Genevieve S. Johnson, Esquire

7
omas: A O

x 33

burg, South Carolina
[29304]



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29211

U.S. POSTAGE
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DEPUTY CLERK

SOUTH CAROLINA COURT OF APPEALS
JENNY ABBOTT KITCHINGS, CLERK OF COURT
P.O. Box 11629
COLUMBIA, South CAROLINA 29211

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