



The South Carolina Court of Appeals

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CLERK

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August 18, 2017

Geary Thomas Dooly
Post Office Box 3326
Spartanburg SC 29304

Re: Deutsche Bank v. Geary Thomas Dooly(2)
Appellate Case No. 2017-001238

Dear Mr. Dooley:

Upon reviewing your amended appellant's initial brief, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR):

- We are returning the exhibits of transcript pages attached to the back of your appellant's initial brief as they are to be included in the record on appeal. Please see Rules 208, 210, and 267, SCACR, for further guidance regarding contents to be included in the initial briefs and in the record on appeal.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jenny Abbott Kitchings".

CLERK

cc: Genevieve Speese Johnson, Esquire
William Price Stork, Esquire

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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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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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