

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas**

Gordon G. Cooper, Master-in-Equity

Case No. 2012-CP-42-3027

Appellate Case No. 2017-001238

RECEIVED

AUG 31 2017

SC Court of Appeals

Deutsche Bank National Trust Company, as Trustee for Argent Securities, Inc.,
Asset-Backed Pas-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.

**DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

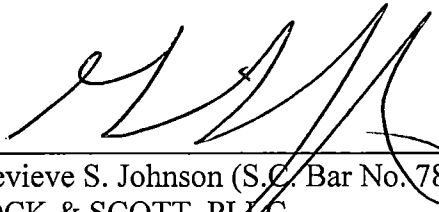
Respondent proposes the following be included in the Record on Appeal:

1. Deutsche Bank's Complaint and all accompanying exhibits, dated July 19, 2012;
2. Affidavit of Service on Defendant Geary Thomas Dooly, dated July 20, 2012;
3. Appellant Geary Thomas Dooly and Defendant Eleanor S. Dooly's Answer and all accompanying exhibits *entitled "Alleged Defendant's Counterclaim as Answer to Plaintiff's Complaint,"* dated August 17, 2012;
4. Deutsche Bank's Reply to Answer and Counterclaim, dated September 20, 2012;
5. Deutsche Bank's Reply to Counterclaims of Defendants, dated September 24, 2012;
6. Deutsche Bank's Motion to Dismiss and all accompanying exhibits, dated January 17, 2013;
7. Appellant Geary Thomas Dooly and Defendant Eleanor S. Dooly's First Amended Answer and all accompanying exhibits, date First Amended Answer and all accompanying exhibited, dated January 31, 2013;

8. Deutsche Bank's Memorandum in Support of its Motion to Dismiss and all accompanying exhibits, dated May 21, 2013;
9. Appellant Geary Thomas Dooly and Defendant Eleanor S. Dooly's "3rd Amended Counterclaim as Answer" and all accompanying exhibits, dated June 20, 2013;
10. Form 4 and Order of the Honorable Roger L. Couch, Circuit Court Judge, dated July 1, 2013;
11. Appellant Geary Thomas Dooly and Defendant Eleanor S. Dooly's Motion to Reconsider and all accompanying exhibits, dated July 31, 2013;
12. Deutsche Bank's Motion to Dismiss and all accompanying exhibits, dated August 1, 2013;
13. Deutsche Bank's Memorandum in Support of its Motion to Dismiss and all accompanying exhibits, dated December 6, 2013;
14. Form 4 and Order of the Honorable Gordon G. Cooper, Master-in-Equity, dated December 31, 2013;
15. Appellant Geary Thomas Dooly's Notice of Appeal, dated January 30, 2014;
16. Court of Appeals Unpublished Opinion No. 2015-UP-404, dated August 12, 2015;
17. Remittitur, dated September, 3, 2015;
18. Deutsche Bank's Motion for Summary Judgment and all accompanying exhibits, dated March 24, 2017;
19. Deutsche Bank's Memorandum in Support of its Motion for Summary Judgment and all accompanying exhibits, dated March 24, 2017;
20. Appellant Geary Thomas Dooly's Reply to Motion for Summary Judgment *entitled as "Alleged Defendant's Reply to Motion for Summary Judgment,"* dated April 6, 2017;
21. Notice of Hearing, dated May 4, 2017;
22. Record of Hearing for Foreclosure Case, dated May 15, 2017;
23. Complete Transcript of May 16, 2017 Hearing, including Exhibits;
24. Form 4 and Order of the Honorable Gordon G. Cooper, Master-in-Equity, (granting Deutsche Bank's Motion for Summary Judgment), dated May 16, 2017; and
25. Notice of Appeal, dated May 24, 2017.

I certify that this designation contains no matter which is irrelevant to this appeal.

Dated: August 31, 2017

By: 
Genevieve S. Johnson (S.C. Bar No. 78480)
BROCK & SCOTT, PLLC
3800 Fernandina Road, Suite 110
Columbia, South Carolina 29210
T: 803-454-3540
F: 803-454-3541

Counsel for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Gordon G. Cooper, Master-in-Equity

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.

RECEIVED

AUG 31 2017

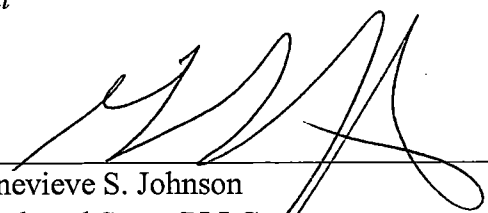
SC Court of Appeals

CERTIFICATE OF SERVICE

I, undersigned of the law offices of Brock & Scott, PLLC, attorneys for Respondent, do hereby certify that I have served a true and correct copy of *Respondent's Designation of Matter to be Included in Record on Appeal* by first-class, U.S. Mail with postage prepaid upon the following:

Geary Thomas Dooly
Eleanor S. Dooly
P.O. Box 3326
Spartanburg, South Carolina 29304
Pro Se Appellant

This 31 day of August, 2017.


Genevieve S. Johnson
Brock and Scott, PLLC
3800 Fernandina Road, Suite 110
Columbia, SC 29210
(803) 454 3540