

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEALS FROM DORCHESTER COUNTY

James E. Chellis, Master-In-Equity

Case No.: 2013-CP-18-00519

Appellant Case No. 2017-002169

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NOV 09 2017

SC Court of Appeals

American Homes 4 Rent Properties Ten, LLC, Petitioner,

In Re:

Wells Fargo Bank, N.A., Respondent,

v.

Richard B. Cunningham; Latisa L. Cunningham; SC Housing Corp.;  
Drakesborough Homeowners Association, Inc., Defendants,

Of Whom Latisa L. Cunningham is the Appellant.

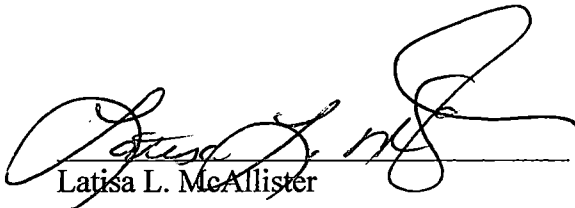
OBJECTION TO RESPONDENTS WELL FARGO MOTION TO DISMISS

Comes Now for Special Appearance, Latisa L. McAllister aka Latisa L. Cunningham objecting to the respondents Wells Fargo Motion to Dismiss. The reasons are as follow:

1. Wells Fargo is no longer a party to this particular action.
2. The proceeding in which Wells Fargo obtained the Summary Judgment for the Foreclosure Sale was in violation of the Clear Field Doctrine "Governments descend to the Level of a mere private corporation, and take on the characteristics of a mere private citizen...where private corporate commercial paper [Federal Reserve Notes] and securities [checks] is concerned. ... For purposes of suit, such corporations and individuals are regarded as entities entirely separate from government Clearfield Trust Co. v. United States 318 U.S. 363-371 (1942)"When governments enter the world of commerce, they are subject to the same burdens as any private firm or corporation" -- U.S. v. Burr, 309 U.S. 242 See: 22 U.S.C.A.286e, Bank of U.S. vs. Planters Bank of Georgia, 6L, Ed. (9 Wheat) 244; 22 U.S.C.A. 286 et seq., C.R.S. 11-60-103
3. The Judgment and Sale are void because the Dorchester County Court is a private owned corporation with a Dunns Number including not limited to the State of South Carolina, which brings us to this very fact that this case was adjudicated without any Fiduciary Relationship between me and the Dorchester County court, the State of South Carolina and there was no Proof of Claim i.e. IRS Form 4490 for the alleged debt filed in my Federal District.

The Respondents Wells Fargo has tried to point out the number of times that I have filed an appeal on this cause but it is my God given Rights for me to fight for what is mine and fight for due process in which I have been totally denied. Looking back at the beginning of this Foreclosure Case it was never started properly because the respondent did not summons me by use of the South Carolina Secretary of State.

Therefore I pray that this court denies the Respondent Wells Fargo Motion to Dismiss.

  
Latisa L. McAllister

11/09/17  
Date

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PROOF OF SERVICE

I, Latisa L. Cunningham certify that I am of such age and discretion to be competent to serve papers. That on the 9 day of Nov, 2017, I have served a copy of the documents listed below, by Certified Mail, sent to each of the following person(s) at the location(s) stated below, which is the last known location.

Document(s): **OBJECTION TO RESPONDENT MOTION TO DISMISS**

Party(ies) Served:

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Latisa L. McAllister

11/09/17  
Date