

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity

86491
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APR 18 2018

Case No. 2012-CP-42-3027

SC Court of Appeals

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.

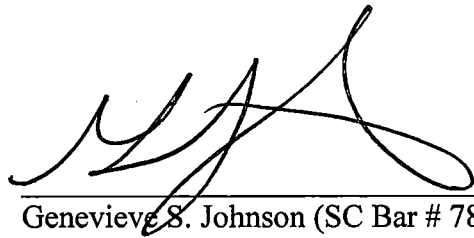
MOTION TO ALLOW THE LATE FILING OF RETURN TO DOCUMENT LABELED
APPELLANT'S MOTION FOR LEAVE OF APPEAL PENDING A VOID JUDGMENT OF
ORDER OF THE LOWER COURT'S ORDER

Respondent, Deutsche Bank National Trust Company, as Trustee for Argent Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2004-W11, through undersigned counsel, moves for leave to submit the late filing of a return to alleged Motion of Appellant. Respondent received the Appellant's document entitled Motion for Leave to Appeal Pending a Void Judgment of Order of the Lower Court and determined said document was not a Motion as it does not fall at all within the scope of Rule 240, SCACR. It is unclear to the Respondent the actual purpose of

the document or what specific relief, if any, Appellant is requesting. Based on the above, Respondent did not file a return. However, upon review of the docket, the document shows as filed with the Court of Appeals on April 4, 2018, and is labeled as a Motion. Therefore, out of an abundance of caution, the Respondent feels the proper procedure may be to file a return. Said return would have been due on April 16, 2018.

Based on the above, Respondent respectfully requests to be allowed to file the attached return out of time.

April 13, 2018

A handwritten signature in black ink, appearing to read 'G. Johnson', written over a horizontal line.

Genevieve S. Johnson (SC Bar # 78480)
Brock and Scott, PLLC
3800 Fernandina Road, Suite 110
Columbia, SC 29210
(803) 454 3540
Attorney for the Respondent

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Gordon G. Cooper, Master-in-Equity**

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Defendants,

Of whom, Geary Thomas Dooly is the Appellant.

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 the *MOTION TO ALLOW THE LATE FILING OF RETURN TO DOCUMENT LABELED APPELLANT'S MOTION FOR LEAVE OF APPEAL PENDING A VOID JUDGMENT OF ORDER OF THE LOWER COURT'S ORDER* 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 18th day of April, 2018.



Brittany R. Sloan
Litigation Paralegal
Brock & Scott, PLLC