

APPELLANT'S 3rd **EMERGENCY** REQUEST FOR A STAY IN A CIVIL CASE

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

BEAUFORT COUNTY
COURT OF COMMON PLEAS

R. THAYER RIVERS JR. / SPECIAL REFEREE

RECEIVED

NOV 01 2018

SC Court of Appeals

CASE No. 2016-CP-07-02261
[No. 2016-LP-07-00637]

Gateway Mortgage Group LLC
Respondent

Vs.

L.E. Pauli Coffey
Appellant

Comes now the Appellant, L.E. Pauli Coffey, pro se and states the following;

On October 30, 2018, Appellant request an Emergency Stay of the sale of her home because Respondent, Gateway Mortgage Group LLC [Gateway], has refused to provide two forms of Surety for the sale of Appellant's home in the middle of an Appeal, as required by the state of South Carolina.

As of the date of this filing, Nov, 1, 2018, Appellant has not received Notice of a Stay of the sale of her home OR two forms of Surety from Respondent, [Gateway].

As previously evidenced by Appellant, Respondent has known for over a year that it intended to illegally force the sale of Appellant's home and did churn this case since August 17, 2017, more than twelve (12) months.

Respondent had more than enough time to secure multiple forms of Surety in that time. Respondent did, by its' own record in its' Memorandum in Support of its' Motion for Summary Judgment, cited by both Appellant and Respondent, perform more than a

dozen appraisals of Appellant's home prior to October 13, 2017. After October 2017, Appellant's home was assessed to be worth \$285,000.00 by Remax Realty of Hilton Head, South Carolina as evidenced by the asking price in its' listing of Appellant's home.

On October 8th, 2018, Appellant was contacted by Linda Pike of Pike Appraisals, the appraisal company used exclusively by Respondent since at least May 2014, about a "Notice" she received "from the Veterans Affairs Administration" request an appraisal of Chris A. Smocks home. Appellant did record these communications and has included a transcribed copy¹ of these communications (Exhibit A, with this Third Request for Emergency Stay based on the laws of the state of South Carolina.

Mrs. Linda Pike did begin her explanation of her desire to appraise Chris A. Smock's home by saying that she received a notice directly from the Veterans Affairs Website to appraise the home of Mr. Chris A. Smock. As cited by Appellant in 2016, the V.A. has no interest in and no liability for the defective mortgage instrument produced by Respondent. Mrs. Pike then continued and explained that Respondent, [Gateway], had asked the V.A. to request the appraisal of Chris Smock's home. By the end of the approximately ten (10) minute conversation between Appellant and Mrs. Pike, Mrs. Linda Pike conceded that the request for appraisal came straight from Respondent, [Gateway], and that the Veterans Affairs Administration had never made any request of Pike Appraisal for the appraisal of any address associated with Appellant.

Clearly Respondent, [Gateway], has no problem impersonating a federal agency for the purpose of continuing it's crimes against and menacing of Appellant.

¹ Appellant was a certified Transcriptionist for the Marion County Sheriff's Department in Indianapolis, IN for several years.

Or possibly it was the intent of Respondent, [Gateway], to receive the proceeds from the illegal sale of Appellant's home and then turn around and charge the V.A. for its'

defective, fraudulent mortgage instrument, as well. This type of behavior is why the state of Georgia banned Respondent, [Gateway] from operating in the state of Georgia, for life.

All digital recordings are available upon request by anyone to include, but not limited to, Respondent, the Federal Bureau of Investigations, The Security and Exchange Commission, and the Court.

Respondent initiated its' illegal suit against Appellant based solely on the lie that it had complied with the requirement that, before Foreclosure, it had served Notice of Foreclosure Intervention on October 25, 2016, on a man who passed away January 7, 2016. Respondent used that lie to justify continuation of the above listed illegal cases when saying that Mr. Chris A. Smock refused or failed to agree to mortgage intervention from his ashen state, and, therefore, Respondent was justified in continuing to sue the one person who had nothing to do with any mortgage or loan or mortgage or loan preparation or mortgage or loan filing or document filing or anything to do with any lending instrument of any kind, especially not the defective, fraudulent and incomplete mortgage Respondent dragged into Court in hopes of having a judge correct any errors Respondent may have perceived, only after the death of Chris A. Smock, the deceased person who, on October 25, 2016, was apparently served with Foreclosure Intervention Paperwork. Respondent perjured its' self in order to file suit, Throughout the life of the above listed, illegal cases, Respondent has repeatedly shown that it is willing to ignore the law and contradict the law and misrepresent the law in order to achieve its' illegal goal of taking Appellant's rightful home from her.

Respondent was perfectly aware and perfectly happy with its' agreement that no home should secure its' incomplete, fraudulent, improperly prepared loan instrument in 2014 and up until October 25, 2016, when Respondent suddenly decided that it was "unaware" of the filing order of documents associated with Appellant's home. Above and beyond that the closing attorney representing Appellant and her husband was hand picked and required by Respondent, and despite the fact that Respondent's employee and its' agent prepared and filed the documents in a manner consistent with Appellant's

understanding of the agreement between Chris A. Smock and Respondent, Respondent had the opportunity and the legal obligation to confirm that all the paperwork was properly filed. Citing the South Carolina Bar CLE 2018 Real Estate Essentials, dated June 15, 2018, citing Spence v. D. Cromer and R. Cromer opinion 26104 filed January 30, 2006, (generally stating) Gateway had public record (which has changed four times since October 25, 2016 as is necessary to aid Respondent in its' illegal pursuit and as have been documented, preserved and cited by Appellant throughout this injustice) of Appellant's home available to it, along with its' own records. Respondent had actual knowledge that Appellant's home did not secure any lending instrument and Respondent was fine with that until Respondent changed its' mind and illegally filed suit against Appellant. Clearly, as evidenced by more than the Beaufort County Public Record shenanigans, Respondent was and is aware that it never had a legal standing to file suit against Respondent. Yet it has destroyed Appellant's life through its' crimes for the purpose of its' own, illegal enrichment and the enrichment of its' agents and those who have helped it by changing public records and by appointing Respondent's counsel as the adjudicator in the above listed, illegal matters.

Further, citing the South Carolina Bar CLE 2018 Real Estate Essentials, dated June 15, 2018, generally, both Federal Land Bank v. Ledford 194 S.C. 347, 359, 9 S.E. 2d 804, 809 (1940) and Jones v. Elbert 211 S.C. 553 558 134 SE 2d 796, 798 both clearly state that, in justice, a third party is not responsible for the errors of a principal and cannot be held responsible for the errors of a principal. Only a principal must be held responsible for its' own errors. Respondent, [Gateway] is exclusively responsible for the document disaster it calls a mortgage and only Respondent, {Gateway} is responsible for the crimes it has committed and responsible for enlisting myriad other public and private employees to aid in its' illegal pursuits. Respondent, [Gateway], has built its' own criminal organization within Beaufort County to include public and private employees and all should be prosecuted for their obvious and well documented crimes. Appellant believes RICO statutes were created to address and prevent and hold accountable those who are responsible for just these types of unbelievable crimes.


Appellant would like to believe that the whole of the state of South Carolina is not a true, complicit believer that these types of crimes are acceptable.

Our laws exist for many reasons. One reason is so that rape is a crime BEFORE a woman says “no” that first time. In Beaufort County South Carolina it is clear that there is no place for the law or truth and that “rape” is perfectly allowable, as evidenced by the lengths that Respondent has achieved in illegally pursuing the sale of Appellant’s home.

Appellant, as repeatedly cited in her filings, cannot move until Appellant sells her home. Respondent has refused to provide Surety in this Appeal, as directed by the state of South Carolina, and therefore cannot sell Appellant’s home until it provides that surety. Appellant has included her second Request for Emergency Stay with this filing for the record.

Wherefore, Appellant prays the Court will Stay the illegal Nov 5, 2018, sale of her home by Respondent until the appellate process is finished or until Respondent provides two forms of Surety, as required. For Appellant’s home. The Order for sale was only achieved through deception, bad faith, the blatant disregard of our laws and through Respondent, in person and through counsel and with lots of help, breaking many laws to include but not limited to, impersonating a federal agency, the Veterans Affairs Administration. The sale of Appellant’s home and making Appellant homeless is not equitable relief to Respondent for the misdeeds and crimes of its’ own employees and agents. Real law is very clear that Appellant legally owns her home and Respondent has no right to it.

Nov 1, 2018


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29902

Other Attorney of Record:

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Columbia, SC

NOTICE OF SERVICE

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APPELLANT'S 3rd REQUEST FOR EMERGENCY STAY
CASES No(s). 2016-CP-07-02261
[No. 2016-LP-07-00637]

Gateway Mortgage Group LLC

Respondent

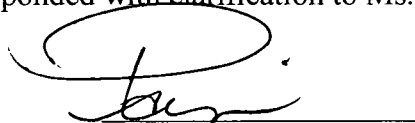
Vs.

L.E. Pauli Coffey

Appellant

On November 1, 2018, Appellant served Paul Hoefer ESQ, an attorney of record for Gateway Mortgage Group LLC (Respondent) with this Designation of Matter. As of Sept 27, 2018, John B. Kelchner, Charles Harry McDonald and Alan M. Stewart were each listed as "Active" AND "Inactive" in the Beaufort County Public Index as counsel for Respondent. On October 1st, 2018, Appellant requested clarification from the lower court as to the status of each attorney. As of the date of this filing, neither the Clerk of 14th Judicial Circuit nor any named attorney has responded with clarification to Ms. Coffey's inquiry.

November 1, 2018



L.E. Pauli Coffey

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Appellant does not have reliable access to the Internet due to poverty caused by the above listed illegal cases. As such, she request all documents be served via USPS certified service.