

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

R. Thayer Rivers, Jr., Special Referee

Appellate Case No. 2018-001743

RECEIVED
NOV 16 2018
SC Court of Appeals

Gateway Mortgage Group, LLC,Plaintiffs-Respondent,

v.

L.E. Pauli Coffey, Defendants-Appellant.

MOTION TO DISMISS

Respondent hereby submits its Motion to Dismiss pursuant to Rule 240 of the South Carolina Appellate Court Rules and shows this Honorable Court the following:

This case involves causes of action for the foreclosure and reformation of a mortgage encumbering real property located in Beaufort County, South Carolina, which was filed on October 25, 2016. This matter was referred to R. Thayer Rivers, Jr., as Special Referee by Order of the Court filed August 17, 2017, with jurisdiction and authority to enter final judgment on any and all causes of action contained in this matter. Respondent filed a Motion for Summary Judgment, which was heard on October 17, 2017. Present at the hearing were John B. Kelchner of Hutchens Law Firm and J. Kershaw Spong of Robinson Gray, attorneys appearing on behalf of the Respondent, the Appellant, appearing *pro se*, R. Thayer Rivers, Jr., acting as Special Referee, and Aaron J. Selman of A. William Roberts, Jr. & Associates in his capacity as Court

Reporter. After the hearing, the undersigned counsel for Respondent ordered and obtained a copy of the Transcript of the Hearing.

Respondent was granted the relief sought in its Motion for Summary Judgment and an Order for Foreclosure and Sale was entered on September 18, 2018. The sale of the subject property was scheduled for November 6, 2018. On September 25, 2018, Appellant filed a Notice of Appeal. On October 1, 2018, Respondent filed a Request for Transcript and Notice to the Court with the Beaufort County Clerk of Court, which is attached hereto as Exhibit A. On October 4, 2018, Appellant filed a Notice with the Court of Appeals in which she claimed to confirm that there was no Circuit Court Transcript. Appellant filed her Initial Brief on October 4, 2018 and her Designation of Matter was accepted on October 15, 2018. The foreclosure sale was stayed on November 2, 2018 by Appellant's Chapter 7 bankruptcy filing in the United States Bankruptcy Court, District of South Carolina, bearing Case No. 18-05614-dd.

This appeal should be dismissed because Appellant did not make satisfactory arrangements in writing with the court reporter for furnishing the transcript in accordance with Rule 207(a)(1) of the South Carolina Appellate Court Rules (SCACR). "Where a transcript of the proceeding must be prepared by the court reporter, appellant shall, within the time provided for ordering the transcript, make satisfactory arrangements (including agreement regarding payment for the transcript), in writing with the court reporter for furnishing the transcript. In appeals from the court of common pleas, masters-in-equity, special referees or the family court in domestic actions, the transcript must be ordered within ten (10) days after the date of service of the notice of appeal." Rule 207(a)(1) SCACR. Undersigned counsel can confirm the transcript exists as he ordered it after the hearing, obtained a copy thereafter, and is currently in

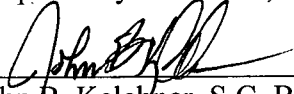
possession of it. Therefore, Appellant is inaccurate in claiming that there is no transcript despite her efforts in attempting to obtain it from the Beaufort County Clerk of Court.

“Lack of familiarity with legal proceedings is unacceptable and the court will not hold a layman to any lesser standard than is applied to an attorney.” *Goodson v. Am. Bankers Ins. Co.* 295 S.C. 400, 403, 368 s.e.2D 687, 689 (Ct. App. 1988). “A pro se litigant who knowingly elects to represent himself assumes full responsibility for complying with substantive and procedural requirements of the law.” *State v. Burton*, 356 S.C. 259, 265, 589 S.E.2d 6, 9, n.5 (2003). Appellant attended the hearing at which the transcript was taken and should have been aware that a Court Reporter was present. She also is well-versed in filing pleadings, motions, etc. with the Court as evidenced by the public index of the within case attached hereto as Exhibit B. Appellant cannot now claim that there was no transcript of the motion hearing and refuse to comply with the South Carolina Rules of Appellate Procedure.

Whenever it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court. Rule 260(a) SCACR. “The failure to comply with the procedural requirements for an appeal divests a court of appellate jurisdiction.” *State v. Brown*, 358 S.C. 382, 387, 596 S.E.2d 39, 41 (2004). Because Appellant did not comply with the South Carolina Appellate Court Rules by failing to make satisfactory arrangements in writing with the court reporter for furnishing the transcript, the Court of Appeals does not have jurisdiction to hear this matter.

Based on the foregoing, the Appellant has failed to perfect and prosecute her appeal. Accordingly, her appeal should be dismissed.

Respectfully submitted,



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-and-

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803-929-1400
phofer@robinsongray.com
Attorneys for Plaintiff-Respondent

Columbia, South Carolina
November 14, 2018

EXHIBIT A

**RESPONDENT'S REQUEST FOR
TRANSCRIPT AND NOTICE TO THE
COURT**

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF BEAUFORT 2018 OCT -1 PM 4:43

Court of Common Pleas
14th Judicial Circuit

GATEWAY MORTGAGE L.P.
BEAUFORT COUNTY, S.C.
JERRI ANN ROSENEAU
CLERK OF COURT

Vs.
LE PAULI COFFEY

C/A No. 2016-CP-07-2261
C/A No. 2016-LP-07-00637

RESPONDENT'S REQUEST FOR TRANSCRIPT AND NOTICE TO THE COURT.

Comes now L.E. Pauli Coffey and hereby incorporates by reference all of her previous filings in Case No. C/A No. 2016-CP-07-2261 and Case No. C/A No. 2016-LP-07-00637 as if fully set forth herein to respectfully show unto this Honorable Court that:

1. Gateway Mortgage Group LLC [Gateway] did illegally file a Lis Pendens against Ms. Coffey and did illegally obtain a judgment for mortgage reformation, where none can occur, by paying cold hard cash to have its' own counsel, R. Thayer Rivers Jr., appointed as adjudicator by the Clerk of the 14th Judicial Circuit of South Carolina.
2. Ms. Coffey did timely file an Appeal in the above captioned illegal cases and is unaware of any Circuit Court Transcript. Should one exist, Ms. Coffey requests that a copy be forwarded to her and to the Court of Appeals as required by Rule 207.
3. On or about 27 Sept, 2018, attorney(s) for plaintiff and also co-counsel to Gateway Mortgage Group LLC with R. Thayer Rivers Jr./Special Referee/ Little Master, John B. Kelchner, Charles Harry McDonald and Alan M. Stewart were all marked "InActive" and no longer associated with the above captioned, illegal cases as per record in the Beaufort County Public Index. Please see attached Beaufort County Public Index record dated 09/27/2018, 1 page.
4. Ms. Coffey was previously denied her Right of Consent to pick and choose who her attorney was when she was denied the right to terminate her attorney's representation due to his untruthfulness in court and to Ms. Coffey. The Court simply refused, in writing, to allow Ms. Coffey to fire her attorney until such a time as the Clerk of Court or counsel for Kevin Stitt and Gateway Mortgage Group LLC, R. Thayer Rivers Jr. [Little Master/Special Referee] got good and ready to issue Orders granting Ms. Coffey's attorney leave from the Case. As a direct result, Ms. Coffey was forced to endure her displeased attorney for nearly a year before the Clerk of Court, Jerri Ann Roseneau OR R. Thayer Rivers (self described, Attorney for Kevin Stitt and Gateway Mortgage Group LLC/ Special Referee) conured up the compunction to finally issue Orders granting leave to Ms. Coffey's previous counsel.
5. Ms. Coffey cannot find, has not seen and has not been issued a copy of the Special Referee or Clerk of Court's Order(s) granting leave to John B. Kelchner, Alan M. Stewart and/or Charles Harry McDonald.
6. Ms. Coffey realizes parity in enforcement of the laws of the state of South Carolina is impossible and is the last thing on the Court's mind or on the mind of Kevin Stitt's favorite judge, R. Thayer Rivers

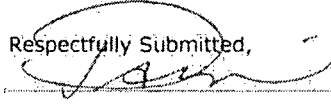
Jr., but it was required by both that Ms. Coffey endure displeased counsel for nearly a year because of the requirement of Orders that both the Clerk of Court and R. Thayer Rivers Jr refused to issue, for the purpose of punishing Ms. Coffey for standing up for herself and her rights in the state of South Carolina and, specifically, in Beaufort County, but the Court required Orders of Ms. Coffey and should therefore provide Ms. Coffey with record of the Order(s) granting leave for the afore mentioned counsel.

7. Ms. Coffey has been denied her Right to Consent for two (2) years by the Clerk of the 14th Judicial Circuit and by R. Thayer Rivers Jr. (Little Master/ Special Referee/ self described Counsel for Kevin Stitt and Gateway Mortgage Group LLC. Just because Ms. Coffey is a widow does not mean she is not entitled to her Right of Consent. **[#MeToo]**

a.) The 14th Amendment to the U.S. Constitution and Article 3 of the Constitution of the state of South Carolina guarantee that all laws are applied equally to all persons. The afore mentioned counsel are all counsel of record at the time R. Thayer Rivers Jr. illegally issued his illegal Orders and inexplicable Judgment not based in law.

The Rights Protections and Guarantees of the laws of the state of South Carolina and the United States are for all people. Individuals may not be singled out and excluded from those rights, protections and guarantees. 14th Amendment, Article 3 of the Constitution of the state of South Carolina

Respectfully Submitted,


L.E. Pauli Coffey
1707 Palmetto Dr.
Beaufort, SC
29902

Distributed via the CMS to:

ATTORNEYS OF RECORD FOR GATEWAY MORTGAGE GROUP LLC

Paul H. Hoefler ESQ
1310 Gadsden Street
Columbia, SC
29201

R. Thayer Rivers Jr.
252 Russell St.
Ridgeland, South Carolina
29936

J. Kershaw Spong
IS NOT AN ATTORNEY OF RECORD FOR GATEWAY MORTGAGE GROUP LLC.

~and~
SPECIAL REFEREE/Little Master

R. Thayer Rivers Jr.
252 Russell St.
Ridgeland, South Carolina
29936

Ms. Coffey does not have reliable access to the internet and therefore only accepts certified service via USPS.



Beaufort County Fourteenth Judicial Circuit Public Index



ELECTRONICALLY FILED - 2018 Oct 01 5:20 PM - BEAUFORT - COMMON PLEAS - CASE#2018CP0702261

Beaufort County Home Page [South Carolina Judicial Department Home Page](#) [SC.GOV Home Page](#)

Switch View

Gateway Mortgage Llc , plaintiff, et al VS L E Pauli Coffey					
Case Number:	2016CP0702261	Court Agency:	Beaufort County Common Pleas	Filed Date:	10/25/2016
Case Type:	Common Pleas	Case Sub Type:	Foreclosure 420	File Type:	Non-Jury
Status:	Appeal	Assigned Judge:	Special Referee G S And C P		
Disposition:	Ended by Non Jury	Disposition Date:	09/18/2018	Disposition Judge:	Special Referee G S And C P
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials								
Click the <input checked="" type="checkbox"/> icon to show associated parties.								
Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated	
<input checked="" type="checkbox"/> Coffey, L E Pauli	1707 Palmetto Dr Beaufort SC 29902				Defendant		01/05/2018	
<input checked="" type="checkbox"/> Coffey, L E Pauli	1707 Palmetto Dr Beaufort SC 29902				Defendant Pro Se		10/18/2017	
French, Shawn M. Sr. (Inactive)	1476 Ben Sawyer Blvd Ste. 3 Mt. Pleasant SC 29464				Defendant Attorney		10/19/2017	
<input checked="" type="checkbox"/> Gateway Mortgage Group Llc					Plaintiff		09/13/2017	
<input checked="" type="checkbox"/> Gateway Mortgage Llc (Inactive)					Plaintiff		09/18/2018	
Kelchner, John Brian	PO Box 8237 Columbia SC 29202				Plaintiff Attorney		12/09/2016	
McDonald, Charles Harry	PO Box 96 Columbia SC 29202				Plaintiff Attorney		04/05/2017	
Stewart, Alan Martin	PO Box 8237 Columbia SC 292028237				Plaintiff Attorney		10/25/2016	
<input checked="" type="checkbox"/> Hoefler, Paul Hamilton	1310 Gadsden Street Columbia SC 29201				Plaintiff Attorney		06/22/2018	
<input checked="" type="checkbox"/> Kelchner, John Brian	PO Box 8237 Columbia SC 29202				Plaintiff Attorney		12/09/2016	
<input checked="" type="checkbox"/> McDonald, Charles Harry	PO Box 96 Columbia SC 29202				Plaintiff Attorney		04/05/2017	
Rivers, R. Thayer Jr.	PO Box 668 Ridgeland SC 29936			1947	Special Referee/Master		08/17/2017	
<input checked="" type="checkbox"/> Stanley, Ashley Zarrett	PO Box 8237 Columbia SC 29202				Plaintiff Attorney		09/25/2018	
<input checked="" type="checkbox"/> Stewart, Alan Martin	PO Box 8237 Columbia SC 292028237				Plaintiff Attorney		10/25/2016	

EXHIBIT B
PUBLIC INDEX
C/A NO. 2016-CP-07-02261



Beaufort County Fourteenth Judicial Circuit Public Index



Beaufort County Home Page South Carolina Judicial Department Home Page SC.GOV Home Page

Switch View					
Gateway Mortgage Llc , plaintiff, et al VS L E Pauli Coffey					
Case Number:	2016CP0702261	Court Agency:	Beaufort County Common Pleas	Filed Date:	10/25/2016
Case Type:	Common Pleas	Case Sub Type:	Foreclosure 420	File Type:	Non-Jury
Status:	Appeal	Assigned Judge:	Special Referee G S And C P		
Disposition:	Ended by Non Jury	Disposition Date:	09/18/2018	Disposition Judge:	Special Referee G S And C P
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials						
Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Coffey, L E Pauli	NEF(10-12-2018 02:33:41 PM) Letter/Letter	Filing		10/12/2018-14:33		
Coffey, L E Pauli	Letter From SC Court of Appeals to L.E. Pauli Coffey	Filing		10/12/2018-14:33		
Coffey, L E Pauli	NEF(10-02-2018 03:52:33 PM) Notice/Other	Filing		10/02/2018-15:52		
Coffey, L E Pauli	Respondent's Notice	Filing		10/02/2018-15:52		
Coffey, L E Pauli	NEF(10-01-2018 05:20:01 PM) Filing/Other	Filing		10/01/2018-17:20		
Coffey, L E Pauli	Respondent's Request for Transcript & Notice to the Court	Filing		10/01/2018-17:20		
Coffey, L E Pauli	NEF(10-01-2018 02:10:44 PM) Order/Other	Filing		10/01/2018-14:10		
Coffey, L E Pauli	SCCoA Order-Motion/Proceed In Forma Pauperis Denied.Filing	Order		10/01/2018-14:10		
Coffey, L E Pauli	NEF(09-28-2018 05:02:55 PM) Filing/Other	Filing		09/28/2018-17:03		
Coffey, L E Pauli	Email/Order From SC CoA-Motion/Proceed In Forma Pauperis	Filing		09/28/2018-17:02		
Gateway Mortgage Group Llc	NEF(09-26-2018 03:49:54 PM) Service/Certificate Of Servi...	Filing		09/26/2018-15:55		
Gateway Mortgage Group Llc	Certificate Of Service of Decree of Foreclosure and Sale	Filing		09/26/2018-15:49		
Gateway Mortgage Group Llc	NEF(09-25-2018 03:15:50 PM) Service/Certificate Of Servi...	Filing		09/25/2018-16:08		
Coffey, L E Pauli	NEF(09-25-2018 03:20:46 PM) Letter/Letter	Filing		09/25/2018-15:22		
Coffey, L E Pauli	Letter to Honorable Kitchings, SC Court of Appeals	Filing		09/25/2018-15:20		
Coffey, L E Pauli	Letter to CoC Roseneau	Filing		09/25/2018-15:20		
Coffey, L E Pauli	Notice of Service	Filing		09/25/2018-15:20		
Gateway Mortgage Group Llc	NEF(09-25-2018 03:13:25 PM) Master/Order/Notice of Forec...	Filing		09/25/2018-15:16		
Gateway Mortgage Group Llc	Certificate Of Service of Decree of Foreclosure	Filing		09/25/2018-15:15		
Gateway Mortgage Group Llc	Notice of Appearance(Attorney A.Z.Stanley)	Filing		09/25/2018-15:15		
Gateway Mortgage Group Llc	Notice of Sale	Order		09/25/2018-15:13		
Coffey, L E Pauli	Image of Notice of Appeal to Court of Appeals,Service,Letter	Filing		09/24/2018-10:34		
Coffey, L E Pauli	Notice of Appeal to Court of	Action		09/24/2018-		

	Appeals,Service,Letter			08:59		
Coffey, L E Pauli	NEF(09-21-2018 12:37:12 PM) Notice/Other	Filing		09/21/2018-12:37		
Coffey, L E Pauli	Respondent's Notice of Intent to File an Appeal	Filing		09/21/2018-12:37		
Gateway Mortgage Group Llc	NEF(09-18-2018 05:03:12 PM) Master/Order/Notice of Forec...	Filing		09/18/2018-17:03		
Gateway Mortgage Group Llc	Notice of Sale	Order		09/18/2018-17:03		
Gateway Mortgage Group Llc	Special Referee's Order/Judgment of Foreclosure and Sale &F4	Order		09/18/2018-17:03		
Coffey, L E Pauli	NEF(09-07-2018 10:26:11 AM) Filing/Other	Filing		09/07/2018-10:34	09/18/2018-10:34	
Coffey, L E Pauli	Respondent's 33rd Demand for Due Process	Filing		09/07/2018-10:26	09/18/2018-10:26	
Coffey, L E Pauli	NEF(09-04-2018 09:26:22 AM) Filing/Other	Filing		09/04/2018-09:26	09/18/2018-09:26	
Coffey, L E Pauli	Respondent's 32nd Demand For Due Process	Filing		09/04/2018-09:26	09/18/2018-09:26	
Coffey, L E Pauli	NEF(08-27-2018 10:41:49 AM) Filing/Other	Filing		08/27/2018-10:42	09/18/2018-10:42	
Coffey, L E Pauli	Respondent's Notice of Service	Filing		08/27/2018-10:41	09/18/2018-10:41	
Gateway Mortgage Group Llc	NEF(08-24-2018 10:22:28 AM) Case Status Update	Filing		08/24/2018-10:22	09/18/2018-10:22	
Gateway Mortgage Group Llc	Case Status Update	Filing		08/24/2018-10:22	09/18/2018-10:22	
Coffey, L E Pauli	NEF(08-24-2018 09:33:30 AM) Filing/Other	Filing		08/24/2018-09:33	09/18/2018-09:33	
Coffey, L E Pauli	Respondent's 31st Demand For Due Process & Request	Filing		08/24/2018-09:33	09/18/2018-09:33	
Coffey, L E Pauli	NEF(08-16-2018 10:28:59 AM) Filing/Other	Filing		08/16/2018-10:29	09/18/2018-10:29	
Coffey, L E Pauli	Respondent's 30th Demand for Due Process & Notice of Intent	Filing		08/16/2018-10:28	09/18/2018-10:28	
Coffey, L E Pauli	NEF(08-14-2018 03:37:22 PM) Filing/Other	Filing		08/14/2018-15:37	09/18/2018-15:37	
Coffey, L E Pauli	Respondent's 29th Demand For Due Process	Filing		08/14/2018-15:37	09/18/2018-15:37	
Coffey, L E Pauli	NEF(08-01-2018 09:13:12 AM) Filing/Other	Filing		08/01/2018-09:13	09/18/2018-09:13	
Coffey, L E Pauli	Respondents Demand for Due Process	Filing		08/01/2018-09:13	09/18/2018-09:13	
Coffey, L E Pauli	NEF(07-30-2018 10:14:27 AM) Filing/Other	Filing		07/30/2018-10:14	09/18/2018-10:14	
Coffey, L E Pauli	Respondent's Additional Evidence In Support of Multiple	Filing		07/30/2018-10:14	09/18/2018-10:14	
Coffey, L E Pauli	NEF(07-23-2018 08:48:13 AM) Response	Filing		07/23/2018-08:48	09/18/2018-08:48	
Coffey, L E Pauli	Respondents Demand for Due Process	Filing		07/23/2018-08:48	09/18/2018-08:48	
Coffey, L E Pauli	NEF(07-03-2018 03:12:09 PM) Filing/Other	Filing		07/03/2018-15:12	09/18/2018-15:12	
Coffey, L E Pauli	Respondent's Notice to the Court & All Parties	Filing		07/03/2018-15:12	09/18/2018-15:12	
Coffey, L E Pauli	NEF(06-29-2018 10:23:24 AM) Filing/Other	Filing		06/29/2018-10:23	09/18/2018-10:23	
Coffey, L E Pauli	Respondent's (26th) Demand for Due Process	Filing		06/29/2018-10:23	09/18/2018-10:23	
Coffey, L E Pauli	NEF(06-27-2018 01:33:19 PM) Filing/Other	Filing		06/27/2018-13:33	09/18/2018-13:33	
Coffey, L E Pauli	Respondent's (25th) Demand For Due Process	Filing		06/27/2018-13:33	09/18/2018-13:33	
Coffey, L E Pauli	NEF(06-20-2018 04:42:08 PM) Filing/Other	Filing		06/20/2018-16:42	09/18/2018-16:42	
Coffey, L E Pauli	Respondent's Request For Presiding Judge	Filing		06/20/2018-16:42	09/18/2018-16:42	
Coffey, L E Pauli	Respondent's Additional Information	Filing		06/20/2018-16:42	09/18/2018-16:42	
Coffey, L E Pauli	NEF(06-13-2018 01:32:38 PM) Notice/Notice of Hearing	Filing		06/13/2018-13:32	09/18/2018-13:32	
Coffey, L E Pauli	Notice of Hearing for 6-28-18 @ 11am	Filing		06/13/2018-13:32	09/18/2018-13:32	
Stewart, Alan Martin	6/28/2018_MOTION_Roster/Notice of Motions Roster Publication	Action		06/13/2018-12:21	09/18/2018-12:21	

Hoefer, Paul Hamilton	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-12:21	09/18/2018-12:21	
Coffey, L E Paul	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-12:21	09/18/2018-12:21	
Kelchner, John Brian	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-12:21	09/18/2018-12:21	
McDonald, Charles Harry	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-12:21	09/18/2018-12:21	
Rivers, R. Thayer Jr.	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-12:21	09/18/2018-12:21	
Rivers, R. Thayer Jr.	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:59	09/18/2018-11:59	
McDonald, Charles Harry	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:59	09/18/2018-11:59	
Coffey, L E Paul	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:59	09/18/2018-11:59	
Kelchner, John Brian	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:59	09/18/2018-11:59	
Hoefer, Paul Hamilton	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:59	09/18/2018-11:59	
Stewart, Alan Martin	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:59	09/18/2018-11:59	
Stewart, Alan Martin	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:47	09/18/2018-11:47	
Rivers, R. Thayer Jr.	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:47	09/18/2018-11:47	
Hoefer, Paul Hamilton	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:47	09/18/2018-11:47	
Kelchner, John Brian	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:47	09/18/2018-11:47	
Coffey, L E Paul	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:47	09/18/2018-11:47	
McDonald, Charles Harry	6/28/2018 MOTION Roster/Notice of Motions Roster Publication	Action		06/13/2018-11:47	09/18/2018-11:47	
Coffey, L E Paul	NEF(06-13-2018 10:41:43 AM) Filing/Other	Filing		06/13/2018-10:41	09/18/2018-10:41	
Coffey, L E Paul	Evidence In Support of Respondents 24th Demand for Due	Filing		06/13/2018-10:41	09/18/2018-10:41	
Coffey, L E Paul	NEF(05-04-2018 02:38:48 PM) Filing/Other	Filing		05/04/2018-14:39	09/18/2018-14:39	
Coffey, L E Paul	Evidence In Support of Respondent's 23rd Demand for Due Proc	Filing		05/04/2018-14:38	09/18/2018-14:38	
Coffey, L E Paul	23rd Demand for Due Process & Notice to All Parties	Filing		05/02/2018-08:47	09/18/2018-08:47	
Coffey, L E Paul	Evidence In Support of Respondent's (22nd) Demand for Due	Filing		04/12/2018-16:57	09/18/2018-16:57	
Coffey, L E Paul	Respondent's(22nd) Demand for Due Process	Filing		04/11/2018-15:46	09/18/2018-08:39	
Coffey, L E Paul	NEF(04-05-2018 11:22:57 AM) Notice/Other	Filing		04/05/2018-11:23	09/18/2018-11:23	
Coffey, L E Paul	Respondent's Notice of Service	Filing		04/05/2018-11:22	09/18/2018-11:22	
Coffey, L E Paul	NEF(04-03-2018 05:00:33 PM) Notice/Other	Filing		04/03/2018-17:00	09/18/2018-17:00	
Coffey, L E Paul	Respondents Notice of Service	Filing		04/03/2018-17:00	09/18/2018-17:00	
Coffey, L E Paul	NEF(03-30-2018 02:38:36 PM) Filing/Other	Filing		03/30/2018-14:38	09/18/2018-14:38	
Coffey, L E Paul	Respondent's(21st) Demand for Due Process	Filing		03/30/2018-14:38	09/18/2018-14:38	
Coffey, L E Paul	Respondent's Notice Of Service of Proposed Order to Spec.Ref	Filing		03/30/2018-14:38	09/18/2018-14:38	
Coffey, L E Paul	Respondents Additional Evidence	Filing		03/26/2018-10:26	09/18/2018-10:26	
Coffey, L E Paul	Respondent's 20th Demand for Due Process	Filing		03/14/2018-08:47	09/18/2018-08:47	
Coffey, L E Paul	Respondent's 19th Demand for Due Process	Filing		03/02/2018-12:46	09/18/2018-12:46	
Coffey, L E Paul	Respondent's 18th Demand for Due Process	Filing		03/02/2018-12:46	09/18/2018-12:46	
Coffey, L E Paul	Respondent's 17th Demand for Due Process	Filing		02/23/2018-11:24	09/18/2018-11:24	
Coffey, L E Paul	Respondent's 16th Demand for Due Process	Filing		02/01/2018-15:05	09/18/2018-15:05	
Coffey, L E Paul	Respondent's Demand For Due Process	Filing		01/17/2018-15:45	09/18/2018-15:45	
Coffey, L E Paul	NEF(01-16-2018 01:15:33 PM)	Filing		01/16/2018-	09/18/2018-	

	Filing/Other			13:15	13:15	
Coffey, L E Pauli	Respondent's Demand for Due Process	Filing		01/16/2018-13:15	09/18/2018-13:15	
Coffey, L E Pauli	Respondent's Demand for Due Process	Filing		01/16/2018-13:15	09/18/2018-13:15	
Coffey, L E Pauli	Respondent's Notice to the Court & Gateway Mortgage Group LL	Filing		01/16/2018-13:15	09/18/2018-13:15	
Coffey, L E Pauli	Respondent's Demand for Due Process	Filing		01/16/2018-13:15	09/18/2018-13:15	
Coffey, L E Pauli	Respondent's Demand For Due Process & Motion to Dismiss	Motion		01/05/2018-14:39	09/18/2018-14:39	
Coffey, L E Pauli	NEF(11-27-2017 10:42:06 AM) Filing/Other	Filing		11/27/2017-10:42	09/18/2018-10:42	
Coffey, L E Pauli	Respondents Demand For Due Process	Filing		11/27/2017-10:42	09/18/2018-10:42	
Coffey, L E Pauli	Notice of Proposed Orders & Notice of Service	Filing		11/21/2017-08:42	09/18/2018-08:42	
Coffey, L E Pauli	Response Notice to the Court & Gateway Mortgage Group	Filing		11/15/2017-10:16	09/18/2018-10:16	
Coffey, L E Pauli	NEF(11-09-2017 11:44:24 AM) Notice/Other	Filing		11/09/2017-11:44	09/18/2018-11:44	
Coffey, L E Pauli	Notice to the Court	Filing		11/09/2017-11:44	09/18/2018-11:44	
Coffey, L E Pauli	Notice of Service (Affirmative Defense)	Filing		10/30/2017-08:26	09/18/2018-08:26	
Coffey, L E Pauli	Amended Notice of Intimidation by Gateway Mortgage &	Filing		10/30/2017-08:25	09/18/2018-08:25	
Coffey, L E Pauli	Notice of Service (Notice of Intimidation) 10-27-17	Filing		10/30/2017-08:23	09/18/2018-08:23	
Coffey, L E Pauli	Notice of Intimidation by Gateway Mortgage Group LLC	Filing		10/26/2017-15:59	09/18/2018-15:59	
Coffey, L E Pauli	Additional Evidence in Support of Response & Motion	Filing		10/23/2017-10:27	09/18/2018-10:27	
Coffey, L E Pauli	Request for Clarification Reference the Status of Shawn M.	Filing		10/23/2017-10:25	09/18/2018-10:25	
Coffey, L E Pauli	Notice of Service	Filing		10/23/2017-10:24	09/18/2018-10:24	
Coffey, L E Pauli	Amended Requests to the Clerk. Unknown Party Signed Order to	Filing		10/20/2017-15:20	09/18/2018-15:20	
Coffey, L E Pauli	Response to Motion to Strike Memo In Support of Motion for	Filing		10/20/2017-13:32	09/18/2018-13:32	
Coffey, L E Pauli	NEF(10-19-2017 10:21:00 AM) Order/Relieve Counsel	Filing		10/19/2017-10:21	09/18/2018-10:21	
Coffey, L E Pauli	Order Granting Motion to Relieved	Order		10/19/2017-10:21	09/18/2018-10:21	
Coffey, L E Pauli	Respondents Communication with all Parties	Filing		10/18/2017-10:12	09/18/2018-10:12	
Coffey, L E Pauli	Request for Clarification from the Clerk of the 14th Circuit	Filing		10/17/2017-12:59	09/18/2018-09:11	
Coffey, L E Pauli	Motion to Dismiss as Cases Have No Basis in Law	Motion		10/17/2017-09:34	10/17/2017-09:34	
Gateway Mortgage Group Llc	NEF(10-13-2017 09:21:21 AM) Filing/Other	Filing		10/13/2017-10:42	09/18/2018-10:42	
Gateway Mortgage Group Llc	Memo In Support of Motion for Summary Judgment	Filing		10/13/2017-09:21	09/18/2018-09:21	
Gateway Mortgage Group Llc	Certificate Of Service.	Filing		10/13/2017-09:21	09/18/2018-09:21	
Coffey, L E Pauli	Demand the Response to Motion for Sum Judg dtd 1/6/17 be up-	Filing		10/12/2017-15:56	09/18/2018-15:56	
Coffey, L E Pauli	Certificate Of Mailing on 10/12/2017	Filing		10/12/2017-10:09	09/18/2018-10:09	
Coffey, L E Pauli	Motion/Proposed Orders to show she never had mtg.	Motion		10/12/2017-10:06	10/17/2017-10:06	
Coffey, L E Pauli	Respondent's Notice Of Service	Filing		10/06/2017-11:37	09/18/2018-11:37	
Coffey, L E Pauli	Second Declintion of Special Referee	Filing		10/02/2017-10:43	09/18/2018-10:43	
Coffey, L E Pauli	Amended Demand for Due Process	Filing		10/02/2017-10:42	09/18/2018-10:42	
Coffey, L E Pauli	Demand for Due Process Reference Her Notice to the Court	Filing		09/27/2017-16:41	09/18/2018-16:41	
Gateway Mortgage Group Llc	Crt Svc Notice of Hearing parties 9-27-17	Filing		09/27/2017-11:05	09/18/2018-11:05	
Gateway Mortgage Group Llc	Notice of Hearing b/f Special Referee 10-17-17 at 2:00 pm	Filing		09/25/2017-14:14	09/18/2018-14:14	

Gateway Mortgage Group Llc	Cert Serv (Notice of Hearing) 9-25-17	Filing		09/25/2017-14:14	09/18/2018-14:14	
Gateway Mortgage Group Llc	Crt Svc Plts Motion/ Summary Judgmeny to Def 9-18-17	Filing		09/18/2017-14:11	09/18/2018-14:11	
Coffey, L E Pauli	Response to Motion for Summary Judgment	Filing		09/18/2017-11:03	09/18/2018-11:03	
Coffey, L E Pauli	Demand for Due Process Reference Her Notice to the Court Dat	Filing		09/15/2017-15:18	09/18/2018-15:18	
Gateway Mortgage Group Llc	Crt Svc Motion/Motion Summary Judgment to Def 9-11-17	Filing		09/11/2017-11:58	09/18/2018-11:58	
Gateway Mortgage Group Llc	Motion for Summary Judgment	Motion		09/11/2017-11:35	10/17/2017-11:35	
Coffey, L E Pauli	Record of Declination to Special Referee	Filing		08/25/2017-11:26	09/18/2018-11:26	
Coffey, L E Pauli	Additional Information in Support of Motion/Request to Strik	Filing		08/23/2017-08:49	09/18/2018-08:49	
Coffey, L E Pauli	Request to Strike Motion and Proposed Order of Reference	Motion		08/22/2017-16:54	10/17/2017-16:54	
Gateway Mortgage Group Llc	Crt Svc Motion/ Order of Reference to Def 8-18-17	Filing		08/18/2017-15:42	09/18/2018-15:42	
Gateway Mortgage Group Llc	Order of Reference to Special Referee	Order		08/17/2017-09:39	09/18/2018-09:39	
Gateway Mortgage Group Llc	Order Cover Sheet \$25.00(reference to SR)	Filing		08/17/2017-09:04	09/18/2018-09:04	
Gateway Mortgage Group Llc	Certificate Of Service	Filing		08/17/2017-09:04	09/18/2018-09:04	
Coffey, L E Pauli	Response to the Court's Order to Vacate Order of Reference &	Filing		08/11/2017-15:16	09/18/2018-15:16	
Coffey, L E Pauli	Letter from MIE Regarding Cancelled Hearing & Dukes Recusal	Filing		08/03/2017-16:15	09/18/2018-16:15	
Coffey, L E Pauli	Order Vacating Order of Reference and Order of Recusal	Order		08/02/2017-08:45	09/18/2018-08:45	
Coffey, L E Pauli	Additional Evidence in Support of Respondents	Filing		07/25/2017-10:29	09/18/2018-10:29	
Coffey, L E Pauli	Evidence in Support of Respondent's Demand for Due Process	Filing		07/24/2017-10:07	09/18/2018-10:07	
Coffey, L E Pauli	Demand for Due Process	Filing		06/30/2017-11:57	09/18/2018-11:57	
Coffey, L E Pauli	Motion to Dismiss	Motion		06/08/2017-13:26	10/17/2017-13:26	
Coffey, L E Pauli	Additional Exhibit to Accompany Defendant's Requests for	Filing		06/01/2017-08:27	09/18/2018-08:27	
Coffey, L E Pauli	Additional Exhibit	Filing		05/25/2017-10:13	09/18/2018-10:13	
Coffey, L E Pauli	Request for Clarification from the Court	Filing		05/15/2017-12:58	09/18/2018-12:58	
Gateway Mortgage Group Llc	Crt Svc Hearing Notice to Def 4-17-17	Filing		04/17/2017-11:43	09/18/2018-11:43	
Coffey, L E Pauli	Additional Exhibits to Accompany Respondent's 2nd Motion to	Filing		04/17/2017-11:23	09/18/2018-11:23	
Coffey, L E Pauli	Notice of Hearing b/f MIE 5-9-17 at 10:00 am	Filing		04/06/2017-08:09	09/18/2018-08:09	
Coffey, L E Pauli	2nd Amended Motion to Reconsider Proposed Orders for SJ	Filing		04/05/2017-09:11	09/18/2018-09:11	
Coffey, L E Pauli	Amended Motion to Reconsider Proposed Orders for Summary Jud	Motion		04/04/2017-12:34	05/09/2017-12:34	
Coffey, L E Pauli	Notice to the Court	Filing		04/03/2017-13:25	09/18/2018-13:25	
Gateway Mortgage Group Llc	Notice/Notice of Appearance	Filing		03/31/2017-14:46	09/18/2018-14:46	
Coffey, L E Pauli	Motion to Vacate Judge Dukes' Order	Motion		02/02/2017-23:59	05/09/2017-23:59	
Coffey, L E Pauli	Motion to Vacate Judge Dukes' Order	Motion		02/01/2017-17:03	05/09/2017-17:03	
Coffey, L E Pauli	Notice/Notice of Appearance	Filing		02/01/2017-15:45	09/18/2018-15:45	
Gateway Mortgage Group Llc	Motion and Order of Reference	Order		01/31/2017-11:54	09/18/2018-11:54	

Gateway Mortgage Group Llc	Order Cover Sheet \$25.00	Filing		01/30/2017-15:18	09/18/2018-15:18	
Gateway Mortgage Group Llc	Affidavit Regarding Military Service	Filing		01/30/2017-15:18	09/18/2018-15:18	
Gateway Mortgage Group Llc	Order Denying Def's Motion/Dismiss S/C,LP & Granting Pla's	Order		01/30/2017-10:52	09/18/2018-10:52	
Coffey, L E Pauli	Motion to Reconsider Proposed Orders for Summary Judgment	Motion		01/30/2017-10:08	05/09/2017-10:08	
Gateway Mortgage Group Llc	Order Cover Sheet \$25.00-Waived(Proposed Order On Motions)	Filing		01/25/2017-14:37	09/18/2018-14:37	
Coffey, L E Pauli	Response to Motion for Summary Judgment	Filing		01/06/2017-16:36	09/18/2018-16:36	
Gateway Mortgage Group Llc	Motion for Summary Judgment on Issue of Validity and Propert	Motion		12/30/2016-12:21	01/11/2017-12:21	
Gateway Mortgage Group Llc	Service/Certificate Of Service	Filing		12/30/2016-12:21	09/18/2018-12:21	
Coffey, L E Pauli	Letter re: MIE Status Update	Filing		12/30/2016-11:47	09/18/2018-11:47	
Coffey, L E Pauli	Request and 3rd Noltice to the Court	Filing		12/16/2016-16:01	09/18/2018-16:01	
Gateway Mortgage Llc	Order Amending Caption Nunc Pro Tunc	Motion		12/16/2016-13:05	12/16/2016-13:05	
Gateway Mortgage Llc	Notice/Notice of Appearance	Filing		12/15/2016-14:32	09/18/2018-14:32	
Coffey, L E Pauli	Notice to the Court	Filing		12/12/2016-08:10	09/18/2018-08:10	
Gateway Mortgage Llc	Certificate of Mortgagor Non-Compliance	Filing		12/09/2016-15:15	09/18/2018-15:15	
Gateway Mortgage Llc	Notice/Notice of Appearance	Filing		12/09/2016-15:15	09/18/2018-15:15	
Coffey, L E Pauli	Responce to Plaintiff's Motion for Lis Pendens	Filing		11/28/2016-15:59	09/18/2018-15:59	
Coffey, L E Pauli	Motion to Dismiss Plt's Motion for Lis Pendens	Motion		11/28/2016-15:37	01/11/2017-15:37	
Coffey, L E Pauli	Notice To The Court	Filing		11/17/2016-14:12	09/18/2018-14:12	
Coffey, L E Pauli	2nd Supplemental Response to Complaint	Filing		11/08/2016-13:11	09/18/2018-13:11	
Coffey, L E Pauli	Supplemental Response to Complaint	Filing		11/02/2016-10:33	09/18/2018-10:33	
Gateway Mortgage Llc	Aff Svc LP SC etc on L E Pauli Coffey 10-26-16	Filing		10/31/2016-14:25	09/18/2018-14:25	
Coffey, L E Pauli	Response to Plt's Complaint	Filing		10/28/2016-08:18	09/18/2018-08:18	
Coffey, L E Pauli	Motion to Dismiss	Motion		10/27/2016-11:03	01/11/2017-11:03	
Gateway Mortgage Llc	Certificate of Exemption from ADR	Filing		10/25/2016-11:06	09/18/2018-11:06	
Gateway Mortgage Llc	Notice of Foreclosure Intervention	Filing		10/25/2016-11:06	09/18/2018-11:06	
Gateway Mortgage Llc	Summons & Complaint	Filing		10/25/2016-11:05	09/18/2018-11:05	
Gateway Mortgage Llc	R100 026 00A 0186 0000	Filing		10/25/2016-11:05	09/18/2018-11:05	

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

R. Thayer Rivers, Jr., Special Referee

Appellate Case No. 2018-001743

RECEIVED
NOV 16 2018
SC Court of Appeals

Gateway Mortgage Group, LLC,Plaintiffs-Respondent,

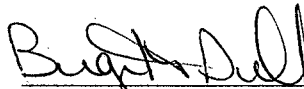
v.

L.E. Pauli Coffey,Defendants-Appellant.

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on today's date, I served on the person(s) below a copy of the Motion to Dismiss of Respondent Gateway Mortgage Group, LLC by depositing same in the United States Mail with sufficient postage affixed and addressed as follows:

L.E. Pauli Coffey
1707 Palmetto Drive
Beaufort, SC 29902
Appellant Pro Se



Brigitte Dull
HUTCHENS LAW FIRM
PO Box 8237 (29202)
240 Stoneridge Dr.
Columbia, SC 29210
(803) 726-2700

Columbia, South Carolina
November 14, 2018

HUTCHENS
— LAW FIRM —

HIGH PERFORMANCE LAW™

Foreclosure Department
Phone: 803-726-2700
Fax: 803-252-6822
HutchensLawFirm.com

Offices In:
Fayetteville, Charlotte, Wilmington, NC | Columbia, SC
240 Stoneridge Drive
Columbia, SC 29210

P.O. Box 8237
Columbia, SC 29202

November 14, 2018

The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

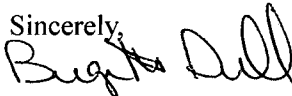
Re: Gateway Mortgage Group, LLC v. L.E. Pauli Coffey.
Appellate Case No. 2018-001743

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SC Court of Appeals

Dear Sir/Madam:

Enclosed please find the original and six (6) copies of the Motion to Dismiss of Respondent Gateway Mortgage Group, LLC regarding the above-referenced matter. By copy of this letter, I am serving Appellant L.E. Pauli Coffey with a copy of the same.

Sincerely,



Brigitte Dull

Enc.

cc: L.E. Pauli Coffey
1707 Palmetto Drive
Beaufort, SC 29902
Appellant Pro Se

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR. THE PURPOSE OF THIS COMMUNICATION IS TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.



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