

89304

CURTIS SHEPHERD
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ORANGE BURG, SC 29115
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[email]

RECEIVED

MAR 25 2019

SC Court of Appeals

THE STATES OF SOUTH CAROLINA

IN THE COURT OF APPEALS

CURTIS SHEPHERD

Case No.: 14-CP-38-0094

Plaintiff, – Appellant

NOTICE OF APPEAL

vs.

WELLS FARGO BANK N.A. TRUST
COMPANY, as Trustee Failures to comply
with Pooling and Servicing Agreement as Bank
Custodian. Cut-Off Date: June 1, 2005
ROGERS TOWNSEND & THOMAS, PC
LENDER PROCESSING SERVICES, Inc.
(hereinafter "LPS") LPS DEFAULT
SOLUTIONS, Inc.Docx
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.,
AS NOMINEE FOR LENDER AND
LENDER'S SUCCESSORS AND
ASSIGNS, AND WELLS FARGO
BANK, N.A., AND PAMELA SIMMONS
BEASLEY. JASON T. MOSS
, AND William H. Sloan, AND John J. Hearn
Jason D. Wyman, Kevin T. Brown,
Cynthia Thomas

APPLICATION FOR
EX PARTE ORDER STAYING
EXECUTION AND FOR ORDER
SHORTENNING TIME FOR THE
SERVICE OF MOTION FOR STAY
OF EXECUTION POINTS AND
AUTHORITIES; DECLARATION OF
DEFENDANT -

**[PROPOSED] ORDER LODGED
HEREWITH**

[No Hearing Required Pursuant to Local
Rule Section 22-3-10 Unless Court So
Orders]

DEFENDANT– RESPONDENT

Date (TO BE SET)
Time

NOTICE AND MOTION

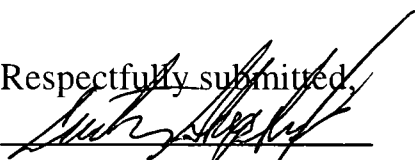
Case No. 14-CP-38-0094

CURTIS SHEPHERD NOTICE OF APPEAL Date:,
March 20, 2019

MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT

1 Plaintiff, – Appellant appeal to The States of South Carolina in the Court of
2 Appeals for the FROM ORANGEBURG COUNTY Court of Common Pleas
3 Court of Common Pleas James B. Jackson Jr, Master-in-Equity's all order books
4 And records, dated from 2012 to 2019 ,Order Granting Preliminary Injunction
5 Entered in the above-captioned action, Case No. 14-CP-38-0094 , and each and
6 Every part thereof
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24 Date:, February 19, 2019

23 Respectfully submitted,
24 
25 _____
26 CURTIS SHEPHERD
27 Plaintiff, – Appellant
28 pro se litigants

28 **MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT**

Issue 3. The Summit, Fleming and Whitt, P.A. (formerly Pearce W. Fleming Law Id. ¶ 18

iv.

SOUTH CAROLINA LAW PROHIBITS THE KICKBACK FEE AGREEMENT

Because of the FIDELITY/LPS responsibility to serve the public interest, South Carolina law places a strict limitation on the use of private, outside counsel by the FIDELITY/LPS: Sharing Legal fees with-Lawyers is illegal, and FIDELITY / LPS is not a Law Firm.

293. Fidelity's "Network Agreements" with its "Network" attorneys reflect Fidelity's Systematic participation in a fee-splitting scheme that occurs routinely in Court cases but without This Court's knowledge.

PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY

Court of Common Pleas

James B. Jackson Jr, Master-in-Equity's

Case No. 14-CP-38-0094

RECEIVED
MAR 25 2019
SC Court of Appeals

WELLS FARGO BANK, NA Respondent,

Wells Fargo Bank, N.A. Failures to comply with
Pooling and Servicing Agreement as Bank
Custodian. Cut-Off Date: June 1, 2005

v.

CURTIS SHEPHERD Appellant.

MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT

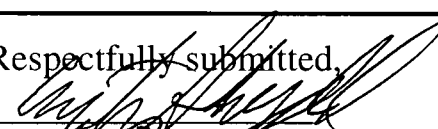
1 **PROOF OF SERVICE**

2
3 I certify that I have served the Notice of Appeal on **WELLS FARGO BANK, NA.** Doe by
4 depositing a copy of it in the United States Mail, postage prepaid, on September 15, 2000,
5 addressed to his attorney of record, , Post Office Box 456, Greenville, South Carolina 29000 [by
6 personally delivering a copy of it to his attorney of record, , at her office at 123 Oak Street,
7 Greenville, South Carolina 29000, on September 15, 2000].

8 September 15, 2000

9
10
11 March , 2019

Respectfully submitted,


12 **CURTIS SHEPHERD**
13 123 SNAP OVER LANE
14 ORANGE BURG, SC 29115
15 (646)706-9736
16 Appellant pro se litigants

17 **Other Counsel of Record:**

18 Jason T. Moss, Esquire
19 Moss & Associates
20 816 Elmwood Avenue
21 Columbia, SC 29201
22 (Respondent,)

23 **WELLS FARGO BANK N.A.**
24 **PO BOX 14411 Des Moines ia**
25 **50306-341**
26 (Respondent,)

27 **LEAD ATTORNEY**
28 John J. Hearn (I.D. 6494)
Jason D. Wyman (I.D. 11294)
Kevin T. Brown (I.D. 5801)
Attorneys for Movant

MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT

1 Rogers Townsend & Thomas, PC
2 Post Office Box 100200
3 Columbia, South Carolina 29202
4 (803) 744-4444
5 (Respondent,)

6 Mr. William H. Sloan
7 SLOAN LAW FIRM, P.A,
8 1055 N Main St Ste F,
9 Summerville, SC 29483
10 (Respondent,)

11 Pamela Simmons-Beasley
12 Chapter 13 Trustee
13 250 Berryhill Road, Suite 402
14 Columbia, SC 29210
15 (Respondent,)

16 LPS Default Solutions
17 601 Riverside Avenue
18 Jacksonville, FL 32204
19 (Respondent,)

20 Lender Processing Services, Inc.
21 601 Riverside Avenue
22 Jacksonville, FL 32204
23 (Respondent)
24
25
26
27

28 **MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT**

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