

APPELLANT'S STATUS UPDATE
March 19, 2019
STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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MAR 19 2019
SC Court of Appeals

BEAUFORT COUNTY
COURT OF COMMON PLEAS

R. THAYER RIVERS JR. / SPECIAL REFEREE/ COUNSEL FOR RESPONDENT

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

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SC Court of Appeals

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 Feb 4, 2019, Appellant gave Notice and evidenced to the Court that at the time of the initial filing of her Appeal, Rule 207 did not require that the transcript from the illegal and contested hearing, presided over by Gateway Mortgage Group LLC co-counsel, R. Thayer Rivers Jr., be provided by appellant.

Further, in her Designation of Matter, Appellant showed that the hearing in question, for which the court has now demanded a transcript, was presided over by Respondent, Gateway Mortgage Group LLC, own co-counsel, R. Thayer Rivers Jr., who refused to recuse himself from the matter and, instead, chose to be paid for breaking the laws of the state of South Carolina, which guarantees an impartial court, as well as to defy the Constitution of the United States of America, the 14th Amendment, which also guarantees an impartial court. No Court is impartial if the Plaintiff's counsel is also the judge, as is well document fact in the matter of Gateway v. Coffey 2016-LP-07-00637 and 2016-cp-07-02261 Beaufort County, South Carolina.

Appellant has never had a mortgage. Appellant does not owe money or her home to Respondent, Gateway Mortgage Group LLC and Respondent, Gateway Mortgage Group LLC has no legal claim to Appellant's home. It was only through illegally employing its' own counsel as adjudicator that Respondent was able to secure a judgment allowing the Reformation of a Mortgage without the inclusion of any borrower, also a crime in the United States of America, as evidenced and referenced by Appellant in her original Appeal from Orders and Judgment.

Appellant also showed to the Court that Respondent, Gateway Mortgage Group LLC and its' counsel, Paul H. Hoefler, R. Thayer Rivers, John B. Kelchner, Charles Harry "Chuck" McDonald, and J. Kershaw Spong, conspired and succeeded in churning the above referenced matters for more than twelve (12) months in order to financially break Appellant because, apparently, crime is the best way to make money and steal homes in the state of South Carolina because it believes it is exempt from compliance with and adherence to the Constitution, and all of its' Amendments, of the United States of America. Appellant can't fix that, she's been trying since she was illegally named as a debtor when she has never been a debtor.

Additionally, Chief Justice Jean Hoefler Toal requires that a debtor be served with Notice of Foreclosure Intervention, a document never served on any debtor in the above referenced matters because Appellant is not a debtor and has never been a debtor, before foreclosure can happen. Appellant assumes South Carolina's bloodline law exempts counsel, Paul H. Hoefler, listed counsel for Respondent, Gateway Mortgage Group LLC, in the lower court matter since day one (1), from compliance with that requirement or the requirement of an impartial court or the requirement that filings are based on fact, and not the fiction composed by Respondent, Gateway Mortgage Group LLC and all of its' counsel, to include but not limited to the Hutchens Law firm, J. Kershaw Spong, and Paul H. Hoefler in order to continue to reap the rewards and benefits of ill-gotten gains by stealing a home from a service connected DAV widow who has never been a debtor.

Also, SCRCF allows the Appellate Court to reverse an Order and Judgment for the first reason it finds in an Appeal from Judgment and Orders. Appellant mistaken believed that thirty three (33) individually enumerated demands for due process denied by Counsel for Respondent/Special Referee, R. Thayer Rivers Jr. would be grounds to reverse and vacate Orders and Judgment that are also illegal. Apparently Appellant was sadly mistaken. Apparently Appellant does not enjoy the benefits and luxuries of the proper bloodline in South Carolina and, therefore, does not get to enjoy the Rights, Protections and Guarantees of the laws and Constitution of the state of South Carolina nor does she get to enjoy the Rights, Protections and Guarantees provided by the U.S. Constitution and our country's laws.

Appellant also mistaken believed that three (3) individually enumerated demands for a jury trial, after the above referenced matters were vacated by the Master In Equity court, might have earned her a jury trial, but found that Respondent's Counsel/Special Referee, R. Thayer Rivers Jr., doesn't seem to believe in Constitutional Rights. Clearly Appellant does not have the "right bloodline" to qualify for a jury trial in South Carolina, either.

The denial of Due Process thirty (33) times, the denial of Jury Demand (3) times and the appointment by Respondent of its' own counsel as adjudicator, in order to secure illegal Judgment and Orders for the purpose of furthering ill-gotten gains and illegal enrichment, are all reasons to reverse and vacate the Orders and Judgment produced by R. Thayer Rivers as Special Referee in the above referenced matters BEFORE addressing

the case laws which individually prohibit the initial filing of Respondent, Gateway Mortgage Group's, illegal Lis Pendens and illegal Complaint against Appellant.

Addressing the laws which prohibit the filing of Lis Pendens against Ms. Coffey, the South Carolina Bar's Real Estate Essentials Manual, the bible of real estate law in South Carolina, clearly shows that Appellant is not legally responsible for the screw ups and wishful thinking of Respondent, Gateway Mortgage Group LLC, and that Respondent, Gateway Mortgage Group LLC had no right to file a Lis Pendens and Complaint. Citing *Federal Land Bank v. Ledford* 194 SC 347, 359, 9 S.E. 2d 804 (1940) "Where agency is established and there is a wrong committed by agent, principal must bear the loss whether the agency is actual or apparent, he who brings about the loss must bear the loss" Respondent, Gateway Mortgage Group LLC, made this mess and it is its' mess for which to bear all loss. Citing *Wachovia v. Coffey*, 698 S.E. 2d 244 (S.C. Ct. App. 2010) specifically, agent is the architect of its' own disaster. Citing *Jones v. Elbert*, 211 SC 553, 558, 134 SE 2d 796, 798 (1945) "As a matter of public policy, principal who selects agent and directs manner in which agent executes his role, in justice to third person with whom agent may deal and who are not responsible for his selection or conduct, is liable for agent's torts committed in furtherance of principal business". And citing, generally, Epps 139 SC at 447, 138 SE 302. Appellant/ Petitioner is not responsible for any disaster Respondent, Gateway Mortgage Group LLC has created. Respondent, Gateway Mortgage Group LLC, could have utilized its' Mortgage Banker Bond [MBB] at any time to cover the loss, described by its' counsel/ Special Referee in his Judgment and Orders, at anytime prior to illegally, wrongfully, wantonly and recklessly filing suit against Appellant for the purpose of its' own illegal enrichment and with the maliciously intended consequence being the destruction of Appellant's life out of no fault of her own.

Appellant realizes that she has no voice in any South Carolina court because she is not an attorney. Appellant wishes to remind this court that the laws of our country are for every person and not just for lawyers and not just for those persons who are represented by lawyers. Job security is no excuse to deny civil and constitutional rights to anyone. Neither is bloodline law.

It is the Court's duty, obligation and responsibility to ensure that Appellant's Rights are not stolen from her. It is not the Appellant's job to stand before the court and ask that her Rights be "gifted" back to her. It has become apparent that it is the inarguable truth that the state of South Carolina only affords the Rights, Protections and Guarantees of the law to those who can pay for those protections.

As Paul H. Hoefler, John B. Kelchner, Alan M. Stewart, the Hutchens law firm J. Kershaw Spong and R. Thayer Rivers Jr., worked in concert to commit crime within the Court and for the purpose of bankrupting Appellant in order to prevent her from saving her home from the malfeasance and corruption of Kevin Stitt, Jack Little, the 14th Judicial Circuit and Gateway Mortgage Group LLC, only the laws of our state and the Constitution of the U.S. could stand to stop these acts. But our laws and our constitution appear to have no place in South Carolina courts.

Appellant has stated and evidenced that she did not owe a transcript to the Court when she filed her Appeal from Orders and Judgment by rule and as a matter of law. Also, that transcript was derived through an illegal hearing that was protested repeatedly and in writing because the Special Referee was and is still co-counsel for Respondent, Gateway Mortgage Group LLC. Respondent, Gateway Mortgage Group LLC, has refused to provide its' record of that illegal hearing because it believes that bloodline law is stronger than the laws and constitution of the state of South Carolina and because it believes bloodline law is stronger than the laws and the Constitution of the United States of America. It is now up to this Court to prove which is stronger in South Carolina, bloodline law or the Constitutions of South Carolina and the U.S.

This Court must decide if Rights are a matter of law or a matter of bloodline law and money in the state of South Carolina and in the U.S. Ms. Coffey has evidenced to the Court that BEFORE Gateway Mortgage Group LLC illegally obtained an invalid lien on her home on Sept 21, 2016¹, Appellant's home NEVER secured a mortgage and that the Probate Court of Beaufort County in the state of South Carolina clearly decided Appellant was the sole and exclusive owner of her home without debt or duty to anyone. Respondent created a mess for which it is solely and exclusively responsible.

The Reformation of a Mortgage without the inclusion of a borrower is illegal in America. This Court has the power to uphold that fact or to throw all borrowers to the wolves of Wall Street and at Wells Fargo. This court must now also decide of its' own volition if Constitutional Rights have a place in South Carolina and America.

Rape is a crime, not a Right of passage.

¹Neither Gateway Mortgage Group LLC, in person or through counsel, nor Beaufort County notified Appellant that an illegal lien had been placed on her home on Sept 21, 2016. until Nov 16, 2018. Gateway Mortgage Group LLC did not legally obtain a mortgage on Appellant's home. Clearly law has no place in Beaufort County, South Carolina for any reason.

March 19, 2019

L.E. Pauli Coffey

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