

**RECEIVED**  
NOV 18 2019  
SC Court of Appeals

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

Deutsche Bank National Trust Company  
as Trustee for Soundview Home Loan  
Trust 2006-1, Asset-Backed Certificates,  
Series 2006-1

IN THE COURT OF COMMON PLEAS  
NOTICE OF APPEAL

Plaintiff,

Case NO. 2012-CP-90000

V.

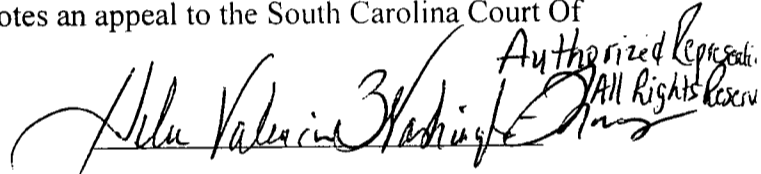
Helen V. Thomas; Darrel A. Thomas;  
Robert Lee Hutchinson; Nancy Lee Hutchinson;  
Briarwood Neighborhood Association; Sonja Michelle  
Furtick

DEFENDANT(S).

RICHLAND COUNTY  
FILED  
2019 NOV 18 AM 10:38  
JEANETTE W. MCBRIDE  
C.C.P., G.S., & F.C.

NOTICE OF APPEAL

*st*  
Helen Valencia Washington - Thomas; Aggrieved notes an appeal to the South Carolina Court Of Appeals, in the above-captioned action.

*Authorized Representative  
All Rights Reserved*  


Helen Valencia Washington-Thomas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18 day of November 2019, a copy of the foregoing Notice of

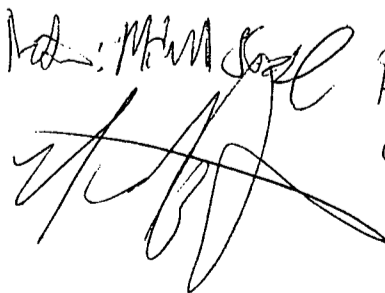
Appeal was served by first class mail on counsel for plaintiff: BROCK & SCOTT, PLLC

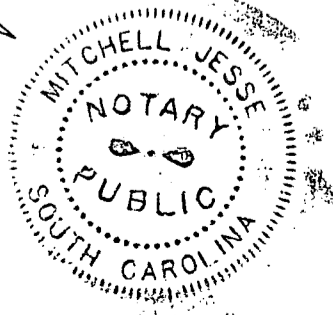
ATTENTION ATTORNEY(S) FOR THE PLAINTIFF:

s/Chad W. Burgess(S.C.Bar No.72520),Caroline Richardson Glenn, Esquire; William Price Stork,  
Esquire; John Marshall Swails, Jr.,Esquire

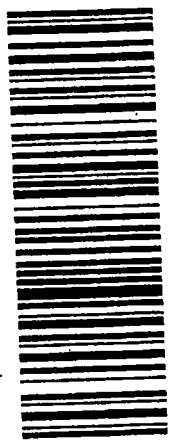
s/Suzanne E. Brown (S.C.Bar No.76440); s/Kathryn Howell @ 3800 Fernandina Road, Suite110  
Columbia, South Carolina 29210

Helen Valencia Washington-Thomas  
Post Office Box 1172  
Columbia, south carolina 29202

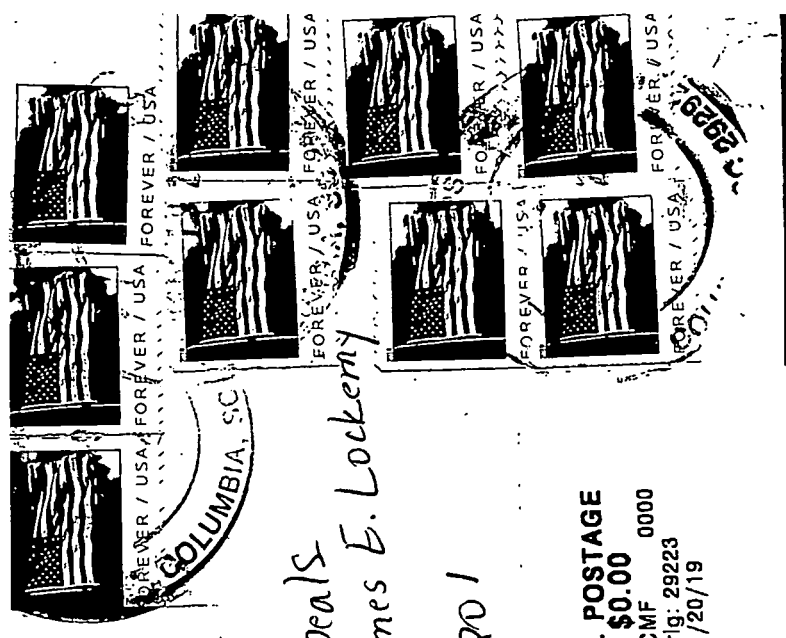
*Notary: Mitchel Jesse*  
*Date: 11/18/19*  
*Exp: 8/13/2023*  




Helen V. Washington - Thomas  
c/o Post Office Box 1172  
Columbia, South Carolina 29202



7018 2290 0000 4715 3625



**RECEIVED**

NOV 21 2019

SC Court of Appeals

South Carolina Court of Appeals  
Attention: Chief Judge James E. Lockery  
1320 Senate Street  
Columbia, South Carolina 29201

**CPU**

U.S. POSTAGE  
\$0.00  
FCMF 0000  
Orig: 29223  
11/20/19  
R200310168

18 November 2019

Dear Judge James E. Lockemy,

I wanted to say more to you; but because I've just gotten over whelmed with tears I will say that I had gotten myself together some. I lost my Dad on 7 August 2019. My Dad was my very Best Friend in this whole world. I'm ready to be back at 3002 Knightbridge Road Columbia, South Carolina my Family and I miss being there and now Realize God Had a Plan & Purpose. I just wanted to say Thank you for trying to wait for me to get it together.

Sincerely,

Helen Valina-Washington - Oh  
c/o Post Office Box 1172  
Columbia, South Carolina 29202  
(803) 605-1234

**RECEIVED**

NOV 22 2019

SC Court of Appeals

**THE SOUTH CAROLINA  
COURT OF APPEALS**

**FILE ON DEMAND**

**Deutsche Bank National Trust  
Company, as Trustee for Soundview  
Home Loan Trust 2006-1, Asset-  
Backed Certificates, Series 2006-1,  
Respondent,**

**Helen V. Thomas; Darrel A. Thomas;  
Robert Lee Hutchinson; Briarwood  
Neighborhood Association; Sonja  
Michelle Furtick,**

**Defendant(s)**

**Of Whom Helen Valencia Washington  
– Thomas is the Appellant,**

**Appellate Case No.**

**RECEIVED**  
NOV 18 2019  
SC Court of Appeals

**ORDER TO VOID JUDGEMENT**

**COMES NOW, Helen Valencia Washington- Thomas, by Special Appearance, it's a  
VIOLATION of the 11th Amendment for a FOREIGN CITIZEN to INVOKE the  
JUDICIAL POWER of the State. Article XI. The Judicial power of the United States  
shall not be construed to extend to any suit in law or equity, commenced or prosecuted  
against one of the United States by Citizens of another State, or by Citizens or Subjects  
of any Foreign State. US citizens (FEDERAL CITIZENS) are FOREIGN to the several  
States and SUBJECTS of the FEDERAL UNITED STATES/STATE of NEW  
COLUMBIA/DISTRICT OF COLUMBIA.**

**Attorneys are considered FOREIGN AGENTS under the FOREIGN AGENTS  
REGISTRATION ACT (FARA) and are SUBJECTS of the BAR ASSOCIATION. Which**

**THE SOUTH CAROLINA  
COURT OF APPEALS**

**FILE ON DEMAND**

is a Private Club. Government Is Foreclosed from Parity with Real People – Supreme Court of the United States 1795 “Inasmuch as every government is an artificial person, an abstraction, and a creature of the mind only, a government can interface only with other artificial persons. The imaginary, having neither actuality nor substance, is foreclosed from creating and attaining parity with the tangible. The legal manifestation of this is that no government, as well as any law, agency, aspect, court, etc. can concern itself with anything other than corporate, artificial persons and the contracts between them.” S.C.R. 1795, *Penhallow v. Doane’s Administraters* (3 U.S. 54; 1 L.Ed. 57; 3 Dall. 54), Supreme Court of the United States 1795

This applies both with Federal Rules of Evidence and State Rules of Evidence.... there must be a competent first hand witness (a body). There has to be a real person making the complaint and bringing evidence before the court. Corporations are paper and can’t testify. “Manifestly, [such statements] cannot be properly considered by us in the disposition of [a] case.” *United States v. Lovasco* (06/09/77) 431 U.S. 783, 97 S. Ct. 2044, 52 L. Ed. 2d 752, “Under no possible view, however, of the findings we are considering can they be held to constitute a compliance with the statute, since they merely embody conflicting statements of counsel concerning the facts as they suppose them to be and their appreciation of the law which they deem applicable, there being, therefore, no attempt whatever to state the ultimate facts by a consideration of which we would be able to conclude whether or not the judgment was warranted.” *Gonzales v. Buist*. (04/01/12) 224 U.S. 126, 56 L. Ed. 693, 32 S. Ct. 463. “No instruction was asked, but, as we have said, the judge told the jury that they were to regard only the evidence admitted by him, not statements of counsel”, *Holt v. United States*, (10/31/10) 218 U.S.

**THE SOUTH CAROLINA  
COURT OF APPEALS**

**FILE ON DEMAND**

245, 54 L. Ed. 1021, 31 S. Ct. 2, "The prosecutor is not a witness; and he should not be permitted to add to the record either by subtle or gross improprieties. Those who have experienced the full thrust of the power of government when leveled against them know that the only protection the citizen has is in the requirement for a fair trial." *Donnelly v. Dechristoforo*, 1974.SCT.41709 ¶ 56; 416 U.S. 637 (1974) Mr. Justice Douglas, dissenting. "Care has been taken, however, in summoning witnesses to testify, to call no man whose character or whose word could be successfully impeached by any methods known to the law. And it is remarkable, we submit, that in a case of this magnitude, with every means and resource at their command, the complainants, after years of effort and search in near and in the most remote paths, and in every collateral by-way, now rest the charges of conspiracy and of gullibility against these witnesses, only upon the bare statements of counsel. The lives of all the witnesses are clean, their characters for truth and veracity un-assailed, and the evidence of any attempt to influence the memory or the impressions of any man called, cannot be successfully pointed out in this record." Telephone Cases. *Dolbear v. American Bell Telephone Company*, *Molecular Telephone Company v. American Bell Telephone Company*. *American Bell Telephone Company v.. Molecular Telephone Company*, *Clay Commercial Telephone Company v. American Bell Telephone Company*, *People's Telephone Company v. American Bell Telephone Company*, *Overland Telephone Company v. American Bell Telephone Company*,. (PART TWO OF THREE) (03/19/88) 126 U.S. 1, 31 L. Ed. 863, 8 S. Ct. 778. "Statements of counsel in brief or in argument are not sufficient for motion to dismiss or for summary judgment," *Trinsey v. Pagliaro*, D. C. Pa. 1964, 229 F. Supp. 647. "Factual statements or documents appearing only in briefs shall not be deemed to be a

RECEIVED

NOV 18 2019

SC Court of Appeals

THE SOUTH CAROLINA  
COURT OF APPEALS

FILE ON DEMAND

part of the record in the case, unless specifically permitted by the Court” – Oklahoma Court Rules and Procedure, Federal local rule 7.1(h). Trinsey v Pagliaro, D.C.Pa. 1964, 229 F.Supp. 647. “Statements of counsel in brief or in argument are not facts before the court and are therefore insufficient for a motion to dismiss or for summary judgment.”,

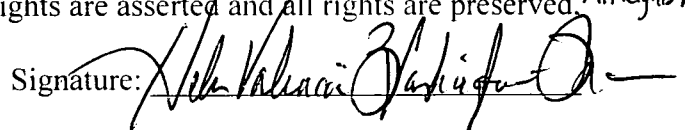
Wherefore, “aggrieved” , Helen Valencia Washington- Thomas, orders the Judgment Void.

Date: November 18, 2019

The above rights are asserted and all rights are preserved.

*Authorized Representative  
All Rights Reserved*

Signature:



Printed Name: Helen Valencia Washington-Thomas

Certificate of Service

I hereby certify that on November 18, 2019, I made service of these documents, “MEMORANDUM AND ASSERTION OF RIGHTS“, by first class mail, postage pre-paid, case no. \_\_\_\_\_

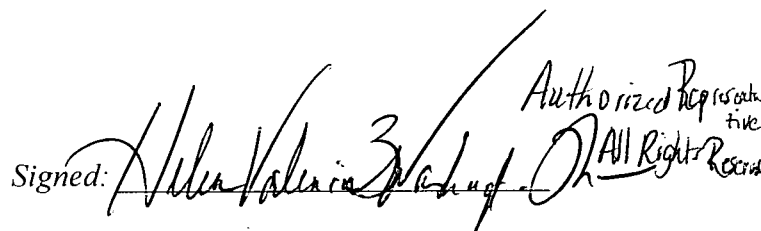
following attorney(s): Suzanne E. Brown, Esquire; Chad Wilson Burgess, Esquire; Caroline Richardson Glenn, Esquire; William Price Stork, Esquire; John Marshall Swails, Jr. Esquire  
ALL OF BROCK AND SCOTT LAW OFFICE; LLP  
Westpark Center 3800 Fernandina Road, Suite 110  
Columbia, South Carolina 29210

*Notary: Mitchell J. Jace*

*[Signature]*  
*11/18/19*  
*exp. 8/13/2023*



Signed:



*Authorized Representative  
All Rights Reserved*

Helen Valencia Washington- Thomas

Dated: November 18, 2019.