

EXHIBIT "B"

DEUTSCHE BANK NATIONAL TRUST COMPANY

IN THE COURT OF COMMON PLEAS

AS TRUSTEE FOR THE BENEFIT OF THE

DOCKET NUMBER 09-CP-23-1297

CERTIFICATEHOLDERS OF POPULAR ABS, INC.

APPELLATE NO. 2012-211936

MORTGAGE PASS THROUGH CERTIFICATES

DEFICIENCY JUDGEMENT WAIVED

SERIES 2007-A

PLAINTIFF,

DEFENDENTS MIMORANDUM AND

V.

ANSWER, IN OPPOSING,

SHARON D. VAUGHAN

SUPPLEMENTAL HEARING

DEFENDANT,

DEFENDANT, APPELLATE;S PRO-SE , GROUNDS FOR OPPOSING

SUPPLEMENTAL HEARING

THIS MATTER IS BEFORE THE SOUTH CAROLINA COURT OF APPEALS, AND IS A ACTIVE CASE BEFORE THE SOUTH CAROLINA COURT OF APPEALS.

1. ROGERS TOWNSEND THOMAS LAW FIRM, FAILING TO COMPLY WITH RULES OF THE APPELLATE COURT , UNDER RULE 212, SUPPLEMENTAL RECORD , (B) BY A PARTY
2. ROGERS TOWNSEND THOMAS, LAW FIRM , FAILURE TO FILE A MOTION TC THE COURT FOR A SUPPLEMENTAL HEARING, SUPPLEMENTAL HEARING UPDATE, WHEN THERE HAS NOT BEEN A MOTION FILED FOR A SUPPELMENAL HEARING,
3. ROGERS TOWNSEND THOMAS, PC, FAILURE TO TURN OVER TO DEFENDANT, APPELLATE IN A TIMELY MANNER, AND ALL DOCUMENTS THEY WOULD WANT TO PRESENT TO THE COURT,
4. DEFENDANT , APPELLANT , VAUGHAN , HAS THE LEGAL RIGHT TO SEE ALL DOCUMENTS IN A TIMELY MANNER, DEFENDENTS, APPELLATES,, RIGHTS WOULD BE SERIOUS VIOLATION OF THERE RIGHTS, RULES OF DISCOVERY , 26, RULES OF CIVIL PROCEDURE

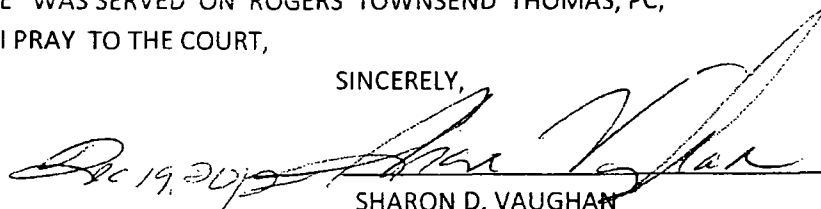
5. DEFENDANT APPELLANT, HAS THE LEGAL RIGHT TO CHALLENGE THOSE DOCUMENTS AND LOOK AT THE VALIDITY, OF THOSE DOCUMENTS, IN A TIMELY MANNER, TIME GIVEN, TO REPLY UNDER COURT FILINGS AND REPLY.
6. THE COURT WOULD BE IN ERROR, OF ALLOWING THIS LAW FIRM TO TRY TO INJECT ANY DOCUMENTS INTO A HEARING, WITHOUT DEFENDANT HAVING THE LEGAL RIGHT TO EVEN SEE BEFORE ANY HEARING, WHAT THOSE DOCUMENTS ARE.
7. FAILURE BY ROGERS TOWNSEND THOMAS, PC, I OF NO MOTION FILED FOR SAID HEARING NO DOCUMENTS TURNED OVER TO DEFENDANT.
8. FAILURE BY ROGERS TOWNSEND THOMAS, PC, IN FILING UNDER EXCEPTIONS RULE 241

RULE UNDER SECTION S.C. CODE, 18-9-130

(2) A PLAINTIFF MAY NOT INFORCE A SALE OF PROPERTY AFTER A NOTICE OF APPEAL IS FILED WITHOUT GIVING AN UNDERTAKING OR BOND TO THE DEFENDANT, WITH (2) GOOD SURETIES, IN DOUBLE THE APPRAISED VALUE OF THE PROPERTY OR DOUBLE THE AMOUNT OF THE JUDGEMENT, CONDITIONED TO PAY ALL DAMAGES THE DEFENDANT MAY SUSTAIN BY REASON OF THE SALE IN THE CASE THE APPEAL IS REVERSED. THE PLAINTIFF IN SUCH A CASE MAY NOT PROCEED WITH THE SALE OF DEFENDANTS PROPERTY IF THE DEFENDANT ENTERS INTO AN UNDERTAKING WITH GOOD SURETIES, IN DOUBLE THE APPRAISED VALUE OF THE PROPERTY OR THE AMOUNT OF THE JUDGEMENT, TO PAY THE JUDGEMENT WITH LEGAL INTEREST AND ALL COST THE PLAINTIFF MAY SUSTAIN BY REASON OF THE APPEAL OR TO PRODUCE LEVIED ON AND SUBMIT TO THE SALE IF THE JUDGEMENT IS CONFIRMED.

APPELLANT FILED A CERTIFICATE OF SURETIES, WITH THE SOUTH CAROLINA COURT OF APPEALS, UNDER S.C. CODE UNDER 241 EXCEPTION 18-9-170, CERTIFICATE OF SURETIES WAS FILED MAY 17, 2012, . PROOF OF SERVICE WAS SERVED ON ROGERS TOWNSEND THOMAS, PC, MAY 17, 2012, , I PRAY TO THE COURT,

SINCERELY,



SHARON D. VAUGHAN

PROOF OF SERVICE ATTACHED

14 COTTINGHAM CIRCLE
GREENVILLE, S.C. 29617-3421
864-325-9551

PROOF OF SERVICE

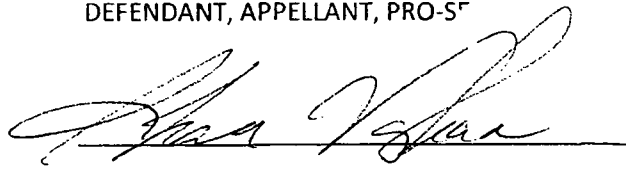
09-cp-23-1297

THIS IS TO CERTIFY THAT SHARON D. VAUGHAN, DEFENDANT, APPELLANT, HAS SERVED A COPY OF DEFENDENTS MEMORANDUM AND ANSWER IN OPP. SING. SUPPLEMENTAL HEARING, PLACED IN THE U.S. POST OFFICE, POSTAGE PAID ON Dec 19, 2012 2012 MAILED TO ROGERS TOWNSEND & THOMAS LAW FIRM, P.O. BOX 100200, COLUMBIA, S.C. 29202

PHONE 803-771-7900
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DEFENDANT, APPELLANT, PRO-5*



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