

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY

Court Of Common Pleas

The Honorable Judge Gordon Cooper
Master In Equity

Appellate Case No 2017-002200

Circuit Court Case No.2010-CP-42-0587

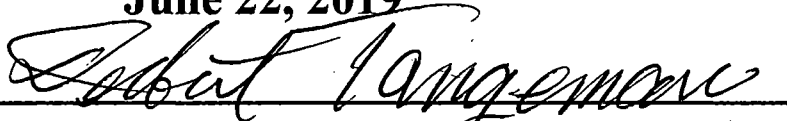
Wells Fargo Bank, N. A.; Trustees for Bear Stearns Asset Backed Securities I Trust
2004-BO1, John B. Kelchner Respondents

V.

Betty L .Tangeman, Barry D. Mallek, Alice R. Mallek, Donald Coggins Jr., and Delbert R.
TangemanDefendants
of Whom Delbert R. Tangeman is the Appellant

Reply to Respondent's Motion to "Dismiss"

June 22, 2019



By DELBERT R. TANGEMAN

104 RIVERSIDE Ln DUNCAN, S. C. 29334 (864)303-4282

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JUN 26 2019

SC Court of Appeals

P. 1 of 8

Appellant's Response To Respondent's Motion To Dismiss
REPLY TO THE FOLLOWING ITEMS

Item 3. The Court knows, very well, that the Appellant has not “Flout” **any of the Court rules!** I should think that Respondents would know better than to insult our Justices in this manner!

Item 4. Respondents appear to be running scared

Item 5. The Court knows very well that Appellant had several deficiencies, but he corrected them timely.

Item 6. Not true! I ordered up the transcript as soon as within the time allotted. I received the order in my mail, Oct. 7, 2017. Notice to appeal was clock in Oct. 13, 2017. The transcript is dated Oct. 9, 2017, So what is the problem Mr. Respondent? It's all in my **Record On Appeal.**

Item 7 -21. It is true that the Appellant had several deficiencies and forgot to leave the filing fees on occasions. However, the Court is well aware that all deficiencies, fees and motions were complied with, within the 10 days allotted.

None of Appellant's motion to “Amend,” were granted...so what is the beef?

Respondent has his own deficiency to take care of.

In item (20), Respondants accused Appellant of “playing... games!”

- a) Both the the plaintiff and judge lied under oath...perjured themselves...When they said they had the original NOTE AND, “PROPER ALONGES!”

THAT IS BOTH INTRINSIC AND EXTRINSIC FRAUD!

- b) It is very doubtful that Plaintiff even had “STANDING” required to bring a case. (We will see how the Justices rule).
- c) Wells Fargo foreclosed and confiscated Appellant's property while denying due Process.
- d) The userra laws are well described by the terms, Wicked default and Unclean hands. Wells Fargo and attorneys who defend them are losing a lot of cases. Google them. Respondents may be “playing games” with both the Appellant and the Court? But Appellant is dead serious.

Item 22. The heading above, in which, you again defamed the justices, claiming “The Appellant circumvented court orders.” Really? The Court has held this

pro se's feet to fire with every motion, filing, and deficiency. This court has been fair to both of us. Respondent is threatened with dismissal too in the Court's letter dated June 20, 2019!

Items 23 - 33. Attached are copies of the stamped dates for Appellant's:

Final Brief, Record on Appeal, Final Reply Brief and Mr. Schulz return signature card proving that he received each. So most of Items 23-33 are liable perjured statements. Appellant can, and does, forgive Attorney Schulz. What the Court does, is of course, up to the Justices.

Item 33. "The Respondent assumes (and hopes) the Court has grown tired of this pro se...." Well, time will tell?

In January of 2018, Your Appellant developed an inner ear infection. Since then, and, to this day, he is left with debilitating vertigo, about 50% lose of hearing and eyesight. Many trips to three ear, nose & throat specialists. About 7 rounds of antibiotic and Antiviral drugs. During the same period he has had skin cancers removed on three different occasions, and, more yet to come. So, please accept my apologies for the extensions?

A handwritten signature in black ink, reading "Robert Tongeman". The signature is fluid and cursive, with a large, looping "R" at the beginning and a long, sweeping tail that extends to the right.

APPELLANT'S FINAL BRIEF

THE STATE OF SOUTH CAROLINA
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APPEAL FROM SPARTANBURG COUNTY
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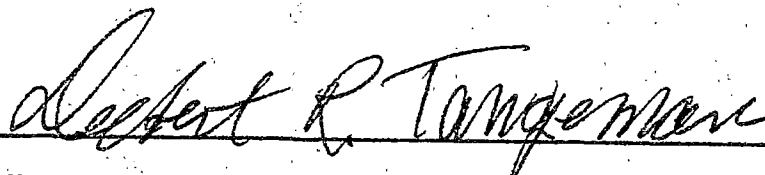
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Tangeman Defendants
of Whom Delbert R. Tangeman is the Appellant

October 22, 2018



By DELBERT R. TANGEMAN

104 RIVERSIDE LANE

DUNCAN, S. C. 29334 (864)303-4282

APPELLANT'S RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA
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FEB 20 2019
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TangemanDefendants
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“Appellant’s Record On Appeal”

January, 2nd, 2019

Delbert R. Tangeman

By DELBERT R. TANGEMAN

104 RIVERSIDE Ln DUNCAN, S. C. 29334 (864)303-4282

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APPELLANT'S FINAL REPLY BRIEF

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TangemanDefendants
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October 22, 2018



By DELBERT R. TANGEMAN

**104 RIVERSIDE LANE
DUNCAN, S. C. 29334 (864)303-4282**

P. 7 of 8

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature ☒ Agent ☐ Addressee <i>[Signature]</i>	
1. Article Addressed to: <i>F. E. Shulyp, esq.</i> <i>214 N. Tryon St.</i> <i>Suite 3700</i> <i>Charlotte, NC 28202</i>		B. Received by (Printed Name) C. Date of Delivery <i>10-26-2013</i>	
9590 9402 4216 8121 5908 87		D. Is delivery address different from item 1? ☐ Yes ☒ No If YES, enter delivery address below:	
2. Article Number (Transfer from service label) 7018 1130 0000 9924 8999		3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☒ Certified Mail® ☒ Certified Mail Restricted Delivery ☐ Collect on Delivery ☐ Collect on Delivery Restricted Delivery ☐ Insured Mail ☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☒ Return Receipt for Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery	
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PROOF OF SERVICE OF RESPONDENT'S MOTION TO DISMISS

The Appellant hereby certifies that he did deposit his **REPLY TO RESPONDENT'S MOTION
TO "DISMISS"** by mailing the same in the U.S. Postal service postage prepaid to:

Marghretta Shisko, Esq., Attorney for Malleks P.O. Box 3547 Sptg, S.C. 29304

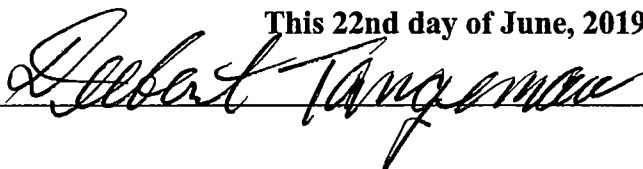
James D. Floyd, Esq., Att. for Respondents, P.O Box 8237 Col., S.C. 29202 (803)726-2700

John B. Kelchner, Esq., Attorney for Respondents P.O. Box 8237 Col. S.C. 29202

M.C. Griffin & J/E. Schulz 214 N. Tryon St Suite 3700 Charlotte, NC 28202 (704)388-6000

Clerk of Court Sptg County, 180 Magnolia St. Sptg. S.C. 29306

This 22nd day of June, 2019



Delbert R. Tangeman

T Delbert Tangeman
104 Riverside Ln.
Duncan, SC 29334



1000 29211

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JUN 26 2019
SC Court of Appeals

*S.C. Court of Appeals
Jenny Abbott Kitchens, Clerk
Col. S.C. P.O. Box 11629
Col. SC 29211*

