

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

68211

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Case No. 2006-CP-10-2859
Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2005-R4CGM under the Pooling and Servicing
Agreement dated as of May 1, 2005, without
Recourse.....Respondent,

v.

Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards; Sylvia Anne Lawrence a/k/a
Sylviatte Anne Lawrence; Glenn M. Huggins;
Michael Huggins; Donnell Huggins; Samuel
Huggins; Ira Huggins a/k/a Ira S. Huggins;
Derwin Huggins; Andrean Huggins Cotton
a/k/a Adrienne Huggins Cotton; Sharon H. Smack;
Dewayne Dixon; Kimberly Nelms; Timothy Nelms;
Jennifer Nelms; Michael A. Brown;
Demetrius Huggins Nelms, a minor;
Darius Simmons, a minor; Dondre Simmons, a minor;
Reginald Huggins; Joseph Huggins; Heather Huggins;
Barbara Huggins; any other Heirs-at-Law or Devises of
Ricky Henry Huggins, Deceased, their heirs,
Personal Representatives, Administrators, Successors and
Assigns, and all other persons entitled to claim through them;
any other Heirs-at-Law or Devises of Henry Buster Huggins, Jr.,
Deceased, their heirs, Personal Representatives, Administrators,
Successors and Assigns, and all other persons entitled to claim
through them; any other Heirs-at-Law or Devises of
Michelle Huggins, Deceased, their heirs, Personal Representatives,
Administrators, Successors and Assigns, and all other persons entitled
to claim through them; any other Heirs-at-Law or Devises
of Buster Huggins, Sr., Deceased, their heirs, Personal
Representatives, Administrators, Successors and

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APR 29 2013

SC Court of Appeals

Assigns, and all other persons entitled to claim through them;
all unknown persons with any right, title or interest
in the real estate described herein; also any persons
who may be in the military service of the United States
of America, being a class designated as John Doe;
and any unknown minors or persons under a disability
being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor
Credit Company; General Motors Acceptance Corporation;
White Directory Holdings Carolina, Inc. d/b/a The Talking
Phone Book; Monogram Credit Card Bank of Georgia;
Michael Twitty; Deborah Twitty; the United States of America,
by and through its agency, the Internal Revenue Service;
and John C. Bigler..... Defendants,

Of whom Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards is theAppellant.

RESPONDENT'S MOTION TO DISMISS APPEAL

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sean.foerster@rtt-law.com

Attorneys for Respondent Deutsche Bank
National Trust Company, as Trustee of
Ameriquest Mortgage Securities, Inc., Asset
Backed Pass Through Certificates, Series
2005-R4CGM under Pooling and Servicing
Agreement dated as of May 1, 2005, without
recourse

April 25, 2013

Respondent Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under Pooling and Servicing Agreement dated as of May 1, 2005, without recourse (“Deutsche Bank”) hereby moves to dismiss the appeal of Appellant Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards (“Vandora Huggins”) on the grounds that this appeal is untimely. Further, Vandora Huggins has ignored orders from the Clerk of Court to cure various other defects in her appeal.

STATEMENT OF THE FACTS

This appeal has a short, yet troubled history. On April 5, 2012, the Master in Equity for Charleston County (“Master”) entered the Final Order being appealed from. On April 9, 2012, the Charleston County Clerk of Court mailed written notice of entry of the Final Order to all parties. (Exhibit 1.) On April 18, 2012, counsel for Deutsche Bank served a filed copy of the Final Order on Vandora Huggins’s attorney. (Exhibit 2.)

Vandora Huggins served the parties with a Notice of Appeal dated May 19, 2012 (“First Notice of Appeal”), and filed it with the Charleston County Clerk of Court on May 18, 2012, but did not file it with this Court. (Exhibit 3.) In the First Notice of Appeal, Vandora Huggins stated that she received written notice of entry of the Master’s Final Order on May 18, 2012.

Vandora Huggins served another Notice of Appeal dated July 16, 2012 (“Second Notice of Appeal”). (Exhibit 4.) Unlike the First Notice of Appeal, Vandora Huggins actually filed the Second Notice of Appeal with this Court, but not until July 16, 2012—98 days after the Charleston County Clerk of Court mailed her a copy of the Final Order, 89 days after counsel for Deutsche Bank mailed a copy of the Final Order to her attorney,

and (if her First Notice of Appeal is to be believed) 59 days after she allegedly received written notice of entry of the Master's Final Order. The copy of the Second Notice of Appeal served on Deutsche Bank contained no proof of service or copy of the order being appealed from. Vandora Huggins attached a copy of the First Notice of Appeal to the Second Notice of Appeal she filed with this Court, but never attempted to file the First Notice of Appeal separately with this Court.

Despite having previously represented in the First Notice of Appeal that she received written notice of entry of the Master's Final Order on May 18, 2012, she represented to the Court in the Second Notice of Appeal that she did not receive written notice of the entry of the Final Order until July 16, 2012.

On July 16, 2012, Vandora Huggins filed and served a "Request for Extension of Time" to "request time to be extended by thirty days," but did not specify the purpose of the requested extension.

On August 3, 2012—18 days after serving the Second Notice of Appeal—Vandora Huggins served a "Request for Ordering Transcript" and filed it with the Charleston County Clerk of Court. She also served a "Notice of Extention [sic] for Ordering Transcript" seeking a 30 day extension, or until September 3, 2012, to order the trial transcript.

On August 23, 2012, the Clerk of Court issued a series of letters (Exhibits 5-7) to Vandora Huggins ordering her to cure the following deficiencies in her appeal within 10 days of those letters:

1. There was no explanation for the differing dates (May 18, 2012 versus July 16, 2012) for her receipt of written notice of the entry of the Final Order between the First Notice of Appeal and Second Notice of Appeal;
2. Her Proof of Service of the Notice of Appeal did not comply with the South Carolina Appellate Court Rules;
3. Her “Request for Extension of Time” contained no Proof of Service;
4. The Transcript Request failed to state the date on which she requested the transcript from the court reporter;
5. The Transcript Request failed to identify the court reporter from whom she requested the transcript;
6. Her Proof of Service of the Transcript Request did not comply with the South Carolina Appellate Court Rules; and
7. She did not provide a copy of the Transcript Request to the South Carolina Court Administration.

On September 6, 2012, Deutsche Bank was served with a copy of an undated letter from Vandora Huggins to the Court purporting to respond to the August 23 deficiency letters. (Exhibit 8.) The letter provided the name and address of the court reporter from whom she requested the transcript on August 3, 2012, and indicated that the court reporter had been paid. The letter offered an explanation as to why she submitted two different notices of appeal at the time she filed the Second Notice of Appeal, but offered no explanation as to why the notices contained different dates as to when she received notice of entry of the Final Order from which she is appealing.

On September 10, 2012, Vandora served a Proof of Service as to the First Notice of Appeal. The Proof of Service seems to indicate that she personally served the First Notice of Appeal on counsel for Deutsche Bank on July 16, 2012, when in fact she personally served the Second Notice of Appeal on counsel for Deutsche Bank on that date.

Vandora Huggins took no further actions to correct the other deficiencies within the time permitted by the Clerk of Court. In summary, Vandora Huggins addressed deficiencies #2, #4, and #5, but Deutsche Bank has not received anything indicating that she cured deficiencies #1 (explanation for the differing dates of her receipt of written notice of the entry of the Final Order), #3 (no Proof of Service of the “Request for Extension of Time”), #6 (Proof of Service of the Transcript Request not complying with the SCACR), and #7 (providing a copy of the Transcript Request to the South Carolina Court Administration).

By letter to the Court dated September 19, 2012, Vandora Huggins indicated that she had received the trial transcript on August 29, 2012, and requested an extension until October 31, 2012, to file her Initial Brief of the Appellant. However, Vandora Huggins did not file a motion for such an extension.

On October 31, 2012, and without the Court having yet responded to her letter requesting an extension to file the initial brief, Vandora Huggins apparently filed her Initial Brief of the Appellant with the Court, but failed to serve Deutsche Bank with it at that time.

On November 1, 2012, Vandora Huggins filed an Amended Initial Brief of the Appellant with the Court, and at that time served Deutsche Bank with copies of both her original and amended initial brief.

By letter of December 10, 2012, the Clerk of Court indicated that “appellant’s initial brief has been received and accepted as filed.” The same letter instructed Deutsche Bank to serve and file the respondent’s initial brief and designation of matter within 30 days of December 10, 2012.

By separate letter of December 10, 2012, the Clerk of Court informed Vandora Huggins that she failed to file a Designation of Matter with her initial brief and ordered her to “file a motion to file the designation of matter late” as well as a “designation of matter” within 10 days of that letter. She failed to comply with that order.

By letter of December 17, 2012, the Clerk of Court ordered Vandora Huggins to provide an explanation as to the purpose of her “Request for Extension of Time” dated July 16, 2012, within 10 days of that letter. She failed to comply with that order. The Court never ruled on her Request for Extension of Time from July 16, 2012.

The Court dismissed this appeal by Order entered January 7, 2013, based on the failure of Vandora Huggins to serve and file a Designation of Matter.

On January 11, 2013, Vandora Huggins served a Motion to Reinstate and attached a proposed Designation of Matter that failed to include a certificate that the Designation contained no matter which is irrelevant to the appeal. On January 24, 2013, Vandora Huggins served an Amended Motion to Reinstate and a Motion for Court Appointed Attorney. Deutsche Bank filed and served returns to both motions.

By Order filed March 27, 2013, the Court accepted the late Designation of Matter and reinstated Vandora Huggins' appeal, but denied her request for a court-appointed attorney.

ARGUMENT

1. The appeal is untimely.

Vandora Huggins's appeal is untimely and must be dismissed. "A notice of appeal shall be served on all respondents within thirty (30) days after receipt of written notice of entry of the order or judgment." Rule 203(b)(1), SCACR. "The notice of appeal shall be filed with the clerk of the lower court and the clerk of the appellate court within ten (10) days after the notice of appeal is served." Rule 203(d)(1)(B), SCACR.

"The service of a notice of appeal is a jurisdictional requirement, and the time for service may not be extended by this Court." *Hill v. South Carolina Dept. of Health and Environmental Control*, 389 S.C. 1, 21, 698 S.E.2d 612, 623 (2010). "The requirement of service of the notice of appeal is jurisdictional, *i.e.*, if a party misses the deadline, the appellate court lacks jurisdiction to consider the appeal and has no authority or discretion to 'rescue' the delinquent party by extending or ignoring the deadline for service of the notice." *Elam v. S.C. Dep't of Transp.*, 361 S.C. 9, 14-15, 602 S.E.2d 772, 775 (2004).

"If the notice of appeal is not timely filed or the filing fee is not paid in full, the appeal shall be dismissed, and shall not be reinstated except as provided by Rule 260." Rule 203(d)(3), SCACR.

Vandora Huggins served the parties with the First Notice of Appeal dated May 19, 2012, and filed it with the Charleston County Clerk of Court on May 18, 2012, but did not file it with this Court. In the First Notice of Appeal, Vandora Huggins stated that

she received written notice of entry of the Master's Final Order on May 18, 2012. Even assuming the First Notice of Appeal was timely served (which Deutsche Bank disputes given that Vandora Huggins claims to not have received written notice of entry of the order until 39 days after the Charleston County Clerk of Court mailed it), her failure to file it renders this action dismissible.

By the time that Vandora Huggins served and filed the Second Notice of Appeal on July 16, 2012, the time to appeal had long since expired. To save her untimely Second Notice of Appeal, she represented to the Court in the Second Notice of Appeal that she did not receive written notice of the entry of the Final Order until July 16, 2012. But that is impossible given that she previously attempted to appeal the final order on May 18, 2012.

For these reasons, Vandora Huggins's appeal must be dismissed.

2. Vandora Huggins failed to cure the other defects in the appeal.

To date, Vandora Huggins has failed to remedy the following defects in her appeal:

1. She has failed to provide the Court with an explanation of the differing dates (May 18, 2012 versus July 16, 2012) she offered for her receipt of written notice of the entry of the Final Order between the First Notice of Appeal and Second Notice of Appeal;
2. She has failed to ever provide the Court with an explanation as to the purpose of her "Request for Extension of Time" dated July 16, 2012;
3. She has never filed a Proof of Service of the "Request for Extension of Time;"

4. She has never filed a Proof of Service of the Transcript Request that complies with the South Carolina Appellate Court Rules; and
5. She has not provided a copy of her Transcript Request to the South Carolina Court Administration.

These are all grounds for dismissal. Rule 260(a), SCACR (“Whenever it appears that an appellant or a petitioner has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court.”).

CONCLUSION

Vandora Huggins failed to timely file her First Notice of Appeal (and likely failed to timely serve it as well), failed to timely serve and file her Second Notice of Appeal, and failed to cure the other deficiencies in her appeal as ordered by the Clerk of Court. Based on the foregoing, the Court must dismiss this appeal.

Respectfully submitted,



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National Trust Company, as Trustee of
Ameriquest Mortgage Securities, Inc., Asset
Backed Pass Through Certificates, Series
2005-R4CGM under Pooling and Servicing
Agreement dated as of May 1, 2005, without
recourse

JULIE J. ARMSTRONG
CLERK OF COURT, C.P. & G.S.
130 BROAD STREET, SUITE 106
CHARLESTON, SC 29401-2258
RETURN SERVICE REQUESTED



26



SEAN MATTHEW FOERSTER
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PO BOX 100200
COLUMBIA SC 29202-3200

NOTICE OF ENTRY OF JUDGMENT/ORDER PURSUANT TO RULE 77 SCRPC

Master/Master's Final Order

CASE NO: 2006CP1002859

Deutsche Bank National Trust Company As Trustee Etc , plaintiff, et al VS Vandora M Huggins Edwards

This judgment was entered on the 05th day of April, 2012, and a copy mailed first class on Monday, April 09, 2012, to all counsel of record and/or all parties entitled to receive notice.

You may view and download this document at www3.charlestoncounty.org.

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April 18, 2012

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Heather Huggins
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Joseph Huggins
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Barbara Huggins
1064 Springfield Church
Trenton, SC 29847

Michael Twitty
2412 Caslreagh Road
Charleston, SC 29414

Deborah Twitty
2412 Caslreagh Road
Charleston, SC 29414

RE: *Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under the Pooling and Servicing Agreement dated as of May 1, 2005, without recourse v. Vandora M. Huggins-Edwards a/k/a Vandora H. Edwards, et al.*
Civil Action # 2006-CP-10-2859
Our File # 010378.00062

Dear Ladies and Gentlemen:

Enclosed herewith and served upon you is a copy of the filed Final Order in the above

Enclosed herewith and served upon you is the copy of Notice of Appeal in this matter:

Rogers Townsend & Thomas, PC
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THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
MASTER IN EQUITY COURT
Mikell R. Scarbrough

CASE NO. 2006-CP-10-2859

In the Matter of:

Deutsche Bank National Trust Company, as Trustee of
Ameriquest Mortgage Securities, Inc. Asset Backed
Pass Through Certificates, Series 2005-R4CGM under
The pooling and Serving Agreement dated as of May 1,
2005, without recourse,
Charleston County Master In Equity Court

FILED
2012 MAY 18 PM 2:47
JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

Deutsche BankAppellants,
Vandora M. Huggins-EdwardsRespondent.

NOTICE OF APPEAL

Vandora M. Huggins-Edwards appeal the Order of the Honorable Judge Mikell R. Scarborough dated April 05, 2012. Appellant received written notice of entry of this Order on May 18, 2012.

May 19, 2012

Other Counsel of Record

Vandora M. Huggins-Edwards

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200 Executive Center Drive
Columbia, South Carolina 29210
Sean M. Foerster attorney for Respondent

1218 Gunn Ave
Charleston, S.C. 29407
Vandora M. Huggins-Edwards PRO SE for
Appellant



THE STATE OF SOUTH CAROLINA

In the Courts of Appeals

APPEAL FROM THE CHARLESTON COUNTY

MASTER IN EQUITY COURT

Mikell R. Scarborough

Case No. 2006-CP-10-2859

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JUL 16 2012

SC Court of Appeals

In the Matter of:

Deutsche Bank National Trust Company, as Trustee of
Ameriquest Mortgages Securities, Inc. Asset Backed
Pass Through Certificates, Series 2005-R4CGM under
The pooling and Serving Agreement dated as May 01,
2005, without recourse,

Deutsche Bank _____ Appellants,

Vandora M. Huggins-Edwards _____ Respondent.

NOTICE OF APPEAL

I Vandora M. Huggins- Edwards appeal the Order of the Honorable Judge Mikell R. Scarborough
Dated April 05, 2012. Appeal received written notice of entry of this order on July 16, 2012.

July 16, 2012

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Columbia, S. C. 29210
Sean M. Foerster attorney Appellants

Vandora M. Huggins-Edwards
1218 Gunn Ave
Charleston, S. C. 29407
Pro SE for respondent



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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1015 SUMTER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
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August 23, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your notice of appeal, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

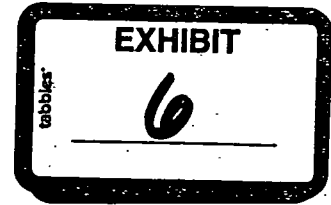
- The accompanying proof of service is not in compliance with the SCACR. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- We have received two notices of appeal. Please provide an explanation to the different dates you received the written notice of entry of the order.

Very truly yours,

A handwritten signature in black ink that reads "Jenny A. Kitchings".

CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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August 21, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your transcript request, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The accompanying proof of service is not in compliance with the SCACR. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- A copy of this document was not provided to the Office of Court Administration as required by the SCACR. The address for Court Administration is 1015 Sumter Street, Suite 200, Columbia, SC 29201.
- Please provide the date you requested the transcript.
- Please provide the name and address of the person you requested the transcript from.

Very truly yours,

Handwritten signature of Jenny A. Kitchings in cursive script.
CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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August 23, 2012

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston SC 29407

Re: Deutsche Bank v. Vandora M. Huggins-Edwards
Appellate Case No. 2012-212524

Dear Counsel:

Upon reviewing your request for extension of time, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script that reads "Jenny A. Kitchings".

CLERK

cc: Sean Matthew Foerster
Arthur C. McFarland



Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, South Carolina 29407
(843) 801-7392
hugginsvandora@yahoo.com

Jenny Abbott Kitchings, Clerk
1015 Sumter Street
Columbia, South Carolina 29201

Re; Deutche Bank v. Vandora M. Huggins-Edwards ET AL.,
Appellate Case No. 2012-212524

Dear Ms. Kitchings:

In response to your letters dated August 23, 2012, I the appellant Vandora M. Huggins-Edwards did filed two notice of appeal the explanation as a follows.

On May 18, 2012 I the appellant filed a Notice of Appeal with the Charleston County, Clerk of Court Julie Armstrong it was to my understanding that Notice of Appeal was to be filed initially in the Charleston County Clerk of Court Julie Armstrong office and from then to be filed and clocked my documents would be forwarded on to the South Carolina Court of Appeals. Then wait for a letter from the court of appeal with the Appellate case Number.

This is why the appellant court received two notices of appeal, I the appellant initially filed the Notice of Appeal in the wrong court. On May 18, 2012 all parties in this matter was sent via Postal Service notice of appeal.

On July 16, 2012 The South Carolina Courts of Appeals received my official Notice of Appeal on this day proof of postal delivery was clock and filed personally by the appellant in your office. On this day Deutsche Bank attorney Sean Forester received deliver of their notice appeal hand delivered by the appellant at his office.

On August 03, 2012, I the appellant filed in Charleston County Clerk of Court of Julie Armstrong and the Master-In-Equity Courts a request for Ordering Transcript to Bernadette A. Cali, CSR, 100 Broad Street, suite 266, Charleston, South Carolina, 29401. I am including a copy of receipt that Ms. Cali has been paid in full for the Transcript in this matter.

My former attorney Arthur McFarland will be sending this court an original petition to be relieved as counsel within the required time that allowed required by this court.

I hope I addressed all concerns issued by this court. If you need any more information pleas call at the above number.

Truly yours,

A handwritten signature in black ink that reads "Vandora M. Huggins-Edwards". The signature is written in a cursive style.

Cc: Sean Foerster

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master in Equity

Case No. 2006-CP-10-2859
Appellate Case No. 2012-212524

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2005-R4CGM under the Pooling and Servicing
Agreement dated as of May 1, 2005, without
Recourse.....Respondent,

v.

Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards; Sylvia Anne Lawrence a/k/a
Sylviatte Anne Lawrence; Glenn M. Huggins;
Michael Huggins; Donnell Huggins; Samuel
Huggins; Ira Huggins a/k/a Ira S. Huggins;
Derwin Huggins; Andrean Huggins Cotton
a/k/a Adrienne Huggins Cotton; Sharon H. Smack;
Dewayne Dixon; Kimberly Nelms; Timothy Nelms;
Jennifer Nelms; Michael A. Brown;
Demetrius Huggins Nelms, a minor;
Darius Simmons, a minor; Dondre Simmons, a minor;
Reginald Huggins; Joseph Huggins; Heather Huggins;
Barbara Huggins; any other Heirs-at-Law or Devisees of
Ricky Henry Huggins, Deceased, their heirs,
Personal Representatives, Administrators, Successors and
Assigns, and all other persons entitled to claim through them;
any other Heirs-at-Law or Devisees of Henry Buster Huggins, Jr.,
Deceased, their heirs, Personal Representatives, Administrators,
Successors and Assigns, and all other persons entitled to claim
through them; any other Heirs-at-Law or Devisees of
Michelle Huggins, Deceased, their heirs, Personal Representatives,
Administrators, Successors and Assigns, and all other persons entitled
to claim through them; any other Heirs-at-Law or Devisees
of Buster Huggins, Sr., Deceased, their heirs, Personal
Representatives, Administrators, Successors and

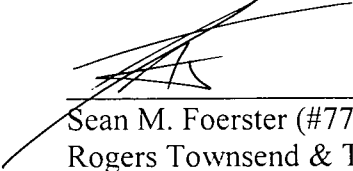
Assigns, and all other persons entitled to claim through them;
all unknown persons with any right, title or interest
in the real estate described herein; also any persons
who may be in the military service of the United States
of America, being a class designated as John Doe;
and any unknown minors or persons under a disability
being a class designated as Richard Roe; South Carolina
Department of Revenue; Safeway Finance; Ford Motor
Credit Company; General Motors Acceptance Corporation;
White Directory Holdings Carolina, Inc. d/b/a The Talking
Phone Book; Monogram Credit Card Bank of Georgia;
Michael Twitty; Deborah Twitty; the United States of America,
by and through its agency, the Internal Revenue Service;
and John C. Bigler..... Defendants,

Of whom Vandora M. Huggins-Edwards a/k/a Vandora
H. Edwards is theAppellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent's Motion to Dismiss Appeal on April 25, 2013, by depositing a copy of each in the United States Mail, postage prepaid, addressed to the each of following parties of record:

Vandora M. Huggins
1218 Gunn Avenue
Charleston, South Carolina 29407



Sean M. Foerster (#77466)
Rogers Townsend & Thomas, PC
Post Office Box 100200(29202)
220 Executive Center Drive
Columbia, SC 29210
803-771-7900
sean.foerster@rtt-law.com

Attorneys for Respondent Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2005-R4CGM under Pooling and Servicing Agreement dated as of May 1, 2005, without recourse