

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY

MASTER IN EQUITY COURT

HONORABLE JUDGE MIKELL R. SCARBOROUGH

Case No. 2006-CP-10-2859

Appellate Case No. 2012-212524

RECEIVED

APR 30 2013

SC Court of Appeals TF

Deutsche Bank National Trust Company, as Trustee of
Ameriquest Mortgages Securities, Inc. Asset Backed Passed
Through Certificates, Series 2005-R4CGM under the Pooling
And Serving Agreement dated as May 01, 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 Huggins; Micheal Huggins; Donnell Huggins; Samuel Huggins; 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 Rickey 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, theirs 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, theirs heirs, Personal Representative, 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; 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 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 Holding 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 _____ Appellant.

APPELLANT MOTION TO DENY RESPONDENT DISMISSAL

Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, S. C. 29407
(843) 801-7392
Appellant-Pro Se

PLEASE TAKE NOTICES that on March 27, 2013 the South Carolina Court of Appeal upon good cause reinstated the Appeal action from the Charleston County Master in Equity Court case # 2006-CP-10-2859; Appellate Case No. 2012-212524.

The Respondent Attorney Sean M. Forester is disrespectfully requesting that the Court of Appellate reserved its decision from reinstated to dismissal base on the Same the grounds they used not to reinstate this action.

That the Respondent Attorney Sean M. Foestar is requesting that the appellate Court dismiss this action based the appellant misunderstanding of the Designation Of Matter should have been filed along with the intinal brief.

That the Respondent Attorney in accordance to the court of appellate Mr. Forester had fifteen days after the Notice of Appeal to file for Dismissal.

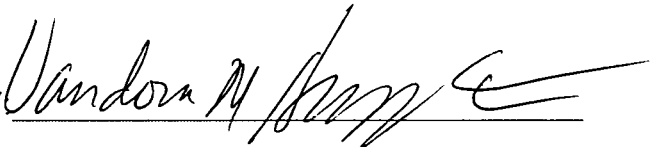
That the Respondent Attorney in accordance to the court of appellate Mr. Forester had fifteen from the Initial Brief to file for Dismissal.

That on April 26, 2013 the respondent attorney Sean M. Foester chose not to Submit intital brief and designation of matter by choice .

That the Appellant Vandora M. Huggins-Edwards is respectfully requesting

That the RESPONDENT'S MOTION TO DISMISS APPEAL BE DENIED.

April 29, 2013

BY 

Without Prejudice UCC 1-207; UCC 1-103

Vandora M. Huggins-Edwards
1218 Gunn Ave.
Charleston, South Carolina 29407
(843)801-7392

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Motors Acceptance Corporation; White Directory Holding 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 _____ Appellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Appellant Motion to Deny Respondent Dismissal of Appeal on April 29, 2013, by depositing a copy in the U. S. Mail Postage prepaid, addressed to the each off following on record;

Sean M. Foerster
Rogers & Townsend & Thomas PC
P. O. Box 100200 (29202)
220 Executive Center Drive Drive
Columbia, South Carolina, 29210
(803) 771-7900

RECEIVED
APR 30 2013
SC Court of Appeals

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 May 1, 2005, Without recourse



Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, South Carolina
(843) 801-7392

The Appellant-PRO SE

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

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
Post Office Box 11629
1015 Sumter Street
Columbia, S. C. 29201

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APR ~~29~~ 2013

SC Court of Appeals *TF*

April 29, 2013

Re: Deutsche Bank v. Vandora M. Huggins-Edwards, ET AL.
Appellate Case No. 2012-212524
Civil Action 2006-CP-10-2859

Dear Honorable Kitchings:

Enclosed for filing are the Original and eight (8) copies of Appellate Response to Motion to Deny the Respondent dismissal of this action. Please return a filed copy in the self-address envelope.

I am also serving one copy of Appellate Motion to deny respondent dismissal. Proof of Service on Respondent attorney Sean M. Foerster by copy of this letter.

Thank You



Vandora M. Huggins-Edwards

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
In The Supreme Court

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JAN 28 2013

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other Heirs-at- Law or Devisees of Michelle Huggins; Deceased, theirs 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, theirs heirs, Personal Representative, 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; 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 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 Holding 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 _____ Appellant.

Amend Motion to Reinstate

Motion for Court Appointed Attorney

Vandora M. Huggins-Edwards
1218 Gunn Avenue
Charleston, S. C. 29407
(843) 801-7392
Appellant-Pro Se

Rogers Townsend & Thomas, PC
220 Executive Center Drive
Columbia, S. C. 29210
Respondent Attorney,
Sean M. Foerster, (SC Bar #
77644)
(803) 771-7900

In Pursuant to Amend Motion to Reinstate filed on January 2013 the appellate is waiting

on ruling from The Court. I am writing to inform this Court I do not under the Law to its full extend.

My action in the handling this matter clearly demonstrate my lack of knowledge in this expertise of the law.

To show cause of action with all due respect to this Court the Respondent Attorney only complaint is my minor clerical error.

I the appellant have demonstrate to this Court this action should not be dismiss on minor technicalities and renders the motion moot. Although the Respondent Attorney complaint did not address any issues that is in the contents of the Initial Brief and the Designation of Matter that was filed along with the Motion to reinstate on

On the final day of the Trail hearing while in the court house the appellant attorney Arthur Mc Farland did not file the Motion of release attorney on February 28, 2012 in this action. The Respondent attorney asking this court to hold the appellate Accountable for the action of the appellant attorney Arthur McFarland he was only contracted for the Foreclosure Action and the trail hearing.

To show cause of action to the respondent attorney response to this Court clearly demonstrate that I need the assistance of a attorney to continue in this action, if this court chose to reinstate.

This supports the appellant position to show of cause action that appellant request legal assistant for a Court appointed attorney.

With the assistance of a court appointed attorney, I will be able to address these matters appropriately to this court and in the proper manner.

Prayer for relief is that I the appellant respectfully request that this Court rule as they see this action in their eyes of the Law and restore to the docket appellant case No. 2012-212524.

Respectfully submitted,

January 24, 2013

A handwritten signature in black ink, appearing to read 'Vandora M. Huggins-Edwards', with a long horizontal flourish extending to the right.

Vandora M. Huggins-Edwards
1218 Gunn Ave
Charleston, S. C. 29407
(843) 801-7392
Hugginsvandora@yahoo. Com
Pro Se

cc.

Sean M. Foerster
Rogers Townsend & Thomas, PC
220 Executive Center Drive
Columbia, South Carolina, 29210
Respondent Attorney

THE STATE OF SOUTH CAROLINA
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In The Supreme Court

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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, theirs heirs. Personal Representative, 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; 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 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 Holding 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 _____ Appellant.

Proof of Service

I HEREBY CERTIFY that I have served the Amend Motion to reinstate and Motion for Court appointed Attorney on January 24, 2013, by depositing a copy of each in the United States, postal Service. To each of the following Party the Respondent Attorney Sean M. Foerster.



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Appellant-Pro Se

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Respondent Attorney,