

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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DEC 27 2023

SC Court of Appeals

APPEAL FROM HORRY COUNTY
ALAN D. CLEMMONS, MASTER-IN-EQUITY

Appellate Case No. 2023-001419
Lower Court Case No. 2021-CP-26-00144

United States of America acting through the
Rural Housing Service or successor agency,
United States Department of Agriculture, Appellant

v.

Patricia A. White a/k/a Patricia Ann White,
and Family Services, Inc., Respondents

**APPELLANT UNITED STATES OF AMERICA ACTING THROUGH THE RURAL
HOUSING SERVICE OR SUCCESSOR AGENCY, UNITED STATES DEPARTMENT
OF AGRICULTURE'S DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL**

Pursuant to Rule 209, SCACR, Appellant proposes the following be included in the Record on Appeal. Unless otherwise stated, all items designated include exhibits and exclude proof of service, cover sheets, motion forms and notices. Appellant reserves the right to include additional designations.

ORDERS

1. Judgment of Foreclosure and Order for sale filed June 2, 2023.
2. Order Denying Motion to Reconsider, Alter or Amend filed September 8, 2023.

PLEADINGS

1. Lis Pendens filed October 28, 2020.
2. Amended Lis Pendens filed January 12, 2021.

3. Notice of Right to Foreclosure Intervention filed January 12, 2021.
4. Summons and Complaint with exhibits filed January 12, 2021.
5. Certificate of Complaint with the Coronavirus Aid, Relief and Economic Security Act filed January 12, 2021.
6. Second Amended Lis Pendens filed July 13, 2021.
7. Amended Notice of Right to Foreclosure Intervention filed July 13, 2021.
8. Amended Summons and Complaint with exhibits filed July 13, 2021.
9. The Affidavit of Service for Patricia A. White filed August 30, 2021.
10. Affidavit of Service for Family Services, Inc. on January 25, 2021.
11. Motion to Appoint Guardian ad Litem for Patricia A. White filed September 16, 2021.
12. Motion to Appoint Guardian ad Litem for Patricia A. White filed November 29, 2021.
13. Notice of Hearing on Motion to Appoint Guardian ad Litem filed May 20, 2022.
14. Form 4 Granting Motion to Appoint Guardian ad Litem filed June 14, 2022.
15. Order Appointing Guardian ad Litem filed June 15, 2022.
16. Order of Reference filed September 16, 2022.
17. Affidavit of Default as to Family Services, Inc. filed September 19, 2022.
18. Affidavit of Non-Military Service filed September 19, 2022.
19. Answer of Guardian ad Litem filed February 16, 2023.
20. Notice of Hearing and Service filed February 17, 2023.
21. Affidavit of Attorney Fees filed March 14, 2023
22. Affidavit of Debt and Authority to Testify with exhibits filed March 14, 2023.
23. Notice of Hearing and Service filed April 18, 2023.
24. Affidavit of Attorney fees filed May 15, 2023.

25. Foreclosure Exhibits filed May 15, 2023.
26. Record of Hearing filed June 2, 2023.
27. Motion to Reconsider filed June 12, 2023.
28. Memorandum in Support of Motion to Reconsider filed June 30, 2023.

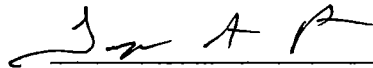
TRANSCRIPTS

1. Webex video file of hearing held May 16, 2023 at 10:00 a.m.
2. Audio Transcription of Hearing before Judge Alan Clemmons of hearing held May 16, 2023 at 10:00 a.m.
3. Record of Hearing filed June 2, 2023.

OTHER RELEVANT DOCUMENTS

1. Various email correspondence by and between Appellant's counsel and Office of the Horry County Master-in-Equity

HARRELL, MARTIN & PEACE, P.A.



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States of America acting through the
Rural Housing Service or successor agency,
United States Department of Agriculture

December 20, 2023
Chapin, South Carolina

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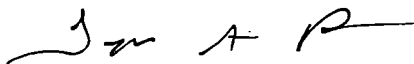
v.

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APPELLANT UNITED STATES OF AMERICA ACTING THROUGH THE RURAL
HOUSING SERVICE OR SUCCESSOR AGENCY, UNITED STATES DEPARTMENT
OF AGRICULTURE'S CERTIFICATE OF COUNSEL REGARDING DESIGNATION
OF MATTER TO BE INLCUDED ON APPEAL

The undersigned counsel certifies that Appellant's Designation of Matter to Be Included
on Appeal complies with Rule 209(c), SCACR, and contains no matter irrelevant to the appeal.

HARRELL, MARTIN & PEACE, P.A.



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ATTORNEYS FOR APPELLANT

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United States of America acting through the
Rural Housing Service or successor agency,
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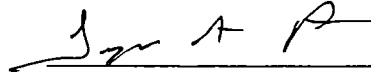
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and Family Services, Inc., Respondents

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant United States of America Acting through the Rural Housing Service or Successor Agency, United States Department Of Agriculture And Designation Of Matter to Be Included on Appeal by depositing a copy of it in the United States Mail, postage prepaid on December 20, 2023; addressed to the court appointed guardian *ad litem* for Respondent Patricia A. White a/k/a Patricia Ann White, Thomas D. Kilpatrick, Murphy & Kilpatrick, LLP, 2512 Devine Street, Columbia, South Carolina 29205, Respondent Patricia A. White a/k/a Patricia Ann White, 3470 Hwy 917, Loris, South Carolina 29569, and Respondent Family Services, Inc., addressed to 8084 Rivers Avenue, Suite 100, North Charleston, South Carolina 29406.

HARRELL, MARTIN & PEACE, P.A.



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December 20, 2023



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*Of Counsel

**Certified Mediator/Arbitrator

December 20, 2023

VIA EMAIL AND REGULAR, FIRST-CLASS MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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**Re: United States of America, et al. v. Patricia A. White, et al.
Appellate Case No.: 2023-001419
Our File No: 2518.28553/TAP**

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing please find the Appellant's Initial Brief and Appellant's Designation of Matter for the above referenced case.

By copy of this letter and as evidenced by the Proof of Service, these filings have been served upon counsel and/or the other Respondents in this matter

Thank you for your time and attention in this matter. If you have any questions, please do not hesitate to contact our office at the phone number below.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.


Tracy Slice Moore

Paralegal to Taylor A. Peace, Esq.

/tsm
Enclosures

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