

THE LAW OFFICE OF  
**DAVID CONOR KEYS LLC**  
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843-906-3998

February 22, 2024

Jenny Abbott Kitchings  
Clerk of Court, Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

**RECEIVED**  
**Feb 22 2024**  
**SC Court of Appeals**

**RE: Deutsche Bank Trust Company Americas, as Trustee for Residential  
Accredit Loans Inc., Pass-Through Certificates 2007 QH2 v. Ashley  
Johnson Beshara, et al.  
Case No. 2019-CP-10-4503**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellant, Ashley Johnson Beshara's Letter in Response to the Court's letter dated February 14, 2024;
- 2) Proof of Service for the Response Letter;

I kindly request that you file the same.

With kind regards,

RESPECTUFLY SUBMITTED,

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC



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D. Conor Keys (100148)  
P.O. Box 14225  
Charleston, SC 29422  
Phone: 843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)  
*Attorney for Appellant Ashley Johnson Beshara*

Enclosures:  
(as stated)

CC: Sammie Arnold; Thomas Richmond McPherson; and Jasmine K. Gardner.

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**RE: Deutsche Bank Trust Company Americas, as Trustee for Residential  
Accredit Loans Inc., Pass-Through Certificates 2007 QH2 v. Ashley  
Johnson Beshara, et al.  
Case No. 2019-CP-10-4503**

Madam Clerk:

Appellant, Ashley Johnson Beshara (“Beshara”), by and through her undersigned counsel writes this letter in response to this Court’s letter dated February 14, 2024, and states in response the following:

- 1) On December 11, 2023, Beshara sent the Office of Court Administration a letter requesting the subject transcript.
- 2) On December 12, 2023, the Office of Court Administration sent counsel for Beshara an email stating that prior to the Office being able to process Beshara’s request for the transcript, counsel must first submit to the Office, the Office’s Transcript Request Form. The Office attached a copy of the form to the email. Counsel for Beshara, neglected to timely see email and make a notation of the email within the file of Beshara. Counsel acknowledges the error and requests forgiveness of the error from this Court.
- 3) On February 14, 2024, Counsel for Beshara became aware of the error and sought immediately to correct the error by requesting a copy of the subject transcript from counsel Mary Leigh Arnold who represents Appellants Curtis Rogers and Julie Rogers. Said counsel kindly responded by providing the undersigned counsel a copy of the subject transcript on February 14, 2024.
- 4) The undersigned counsel has further undertaken to correct the error by sending a Transcript Request Form to the Office of Court Administration who has acknowledged receipt of the request, so that Beshara may obtain and pay the Office of Court Administration for an official copy of the subject transcript.

- 5) Beshara acknowledges that pursuant to Rules 207 and 208, SCACR, that on or before Monday, March 11, 2024, Beshara shall file her initial brief and designation of matter to be included within the record on appeal, with this Court.

Thank you for the Court's time and consideration.

RESPECTFULLY SUBMITTED,

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC

*s/ D. Conor Keys* \_\_\_\_\_

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*Attorney for Ashley Johnson Beshara*

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**Feb 22 2024**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

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App. Case No. 2023-001844

Case No. 2019-CP-10-4503

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Deutsche Bank Trust Company Americas, as Trustee for Residential  
Accredit Loans Inc., Pass-Through Certificates 2007 QH2.....Respondent,

v.

Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for  
2235 Shoreline Drive originally dated the 3rd day of March 2010; Shoreline  
Farms Community Association, Inc.; Wells Fargo Bank, N.A.; Cadle  
Rock Joint Venture, L. P. an Ohio Limited Partnership, Curtis Rogers and  
Julie Rogers Defendants,

Of Whom Curtis Rogers, Julie Rogers, and Ashley Johnson Beshera Trustee  
of the Revocable Trust Agreement for 2235 Shoreline Drive originally  
dated 3rd day of March 2010 are.....Appellants,

AND

Ashley Johnson Beshera as Trustee of the Revocable Trust Agreement for 2235  
Shoreline Drive originally dated 3rd day of March 2010, Third-Party Plaintiff,

v.

Nationstar Mortgage LLC, Third-Party Defendant.

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**PROOF OF SERVICE**

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I certify that on this 22<sup>nd</sup> day of February, 2024, I have served Appellant’s Ashley Johnson  
Beshara’s letter in response to the Court’s letter dated February 14, 2024 upon all other counsel of

record at the email address listed for said counsel on AIS, as well, as the Office of Court Administration at said offices' transcript request email as follows:

MARY LEIGH ARNOLD, PA  
Mary Leigh Arnold (419)  
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*Attorneys for Deutsche Bank Trust Company  
Americas, as Trustee for Residential Accredited  
Loans, Inc., Pass-Through Certificates 2007-QH2  
and Nationstar Mortgage LLC*

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*Attorney for Ashley Johnson Beshara*