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Apr 24 2024

SC Court of Appeals

**FORM 14
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

**Honorable Kristi F. Curtis
Court of Common Pleas**

Case No.2019-CP-10-4503

Appellate Case No. 2023-001844

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

Of Whom Curtis Rogers, Julie Rogers and Ashley Johnson Beshara Trustee
of the Revocable Trust Agreement for 2235 Shoreline Drive originally dated 3rd
day of March 2020 are Appellants,

v.

Nationstar Mortgage LLC,.....Respondent.

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Respondent proposes the following be included in the Record on Appeal:

PLEADINGS

Plaintiff's Summons and Complaint filed 08/27/2019;
Beshara's Answer and Counterclaim filed 07/08/2020;
Beshara's Amended Answer and Counterclaims filed 07/15/2020;
Rogers' Answer and Counterclaims filed 08/13/2020;

MOTIONS

Beshara's Motion to Dismiss filed 10/18/2019;
Beshara's Reply to Return to Motion to Dismiss filed 06/12/2020;
Rogers' Motion to Compel filed 09/07/2022;
Rogers' Motion for Summary Judgment filed 09/08/2022;
Respondent's Motion for Partial Summary Judgment (incl. Exhs.) filed 10/07/2022;
Respondent's Amended Motion for Summary Judgment (incl. Exhs.) filed 10/10/2022;
Respondent's Brief in Opposition to Rogers' Motions filed 02/01/2023;
Respondent's Brief in Support of Respondent's Motion filed 02/01/2023;
Rogers' Motion for Reconsideration filed 07/20/2023;
Beshara's Motion for Reconsideration filed 07/20/2023;
Respondent's Memorandum in Opposition to Motion for Reconsideration filed
09/29/2023;

ORDERS

Order Denying Beshara's Motion to Dismiss filed 06/20/2020;
Order Allowing Rogers Intervention filed 07/28/2020;
Scheduling Order filed 04/13/2022;
Order on Motions for Summary Judgment filed 07/10/2023;
Order Denying Motions to Reconsider filed 11/01/2023;

OTHER

Transcript of Hearing on February 10, 2023

I certify that this designation contains no matter which is irrelevant to this appeal.

Date: April 24, 2024

/s/ T. Richmond McPherson, III
T. Richmond McPherson, III
(SC Bar ID #80432)
MCGUIREWOODS LLP

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Charlotte, North Carolina 28202

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rmcpherson@mcguirewoods.com

Attorneys for Plaintiff/Appellee

*U.S. Bank Trust, N.A., as Trustee for LSF10 Master
Participation Trust*

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

THE HONORABLE KRISTI F. CURTIS, CIRCUIT COURT JUDGE

APPELLATE CASE NO.: 2023-001844

CASE NO. 2019-CP-10-4503

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

Of Whom Curtis Rogers, Julie Rogers and Ashley Johnson Beshara Trustee
of the Revocable Trust Agreement for 2235 Shoreline Drive originally dated 3rd
day of March 2020 are Appellants,

v.

Nationstar Mortgage LLC,..... Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the *Respondents Deutsche Bank Trust Company Americas' Reply to Appellants Curtis and Julie Rogers' and Ashley Beshara's Initial Briefs* upon all counsel of record in this action via electronic mail, on April 24, 2024 as follows:

Mary Leigh Arnold
Sammie@maryarnoldlaw.com

David Conor Keys
conor@dconorkeyslaw.com

Magalie A. Creech
creechm@charleston-sc.gov

Elizabeth Shuffler Moore
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/s/ T. Richmond McPherson, III
T. Richmond McPherson, III
(SC Bar ID #80432)
MCGUIREWOODS LLP
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2038
rmcpherson@mcguirewoods.com
Attorneys for Respondent

April 24, 2024

VIA US MAIL AND EMAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

Re: *Deutsche Bank Trust Company Americas v. Ashley Johnson Beshara, et. al.*
Court of Appeals No. 2023-001844

Dear Mrs. Kitchings:

Please find attached for filing the following with regard to the above case.

1. Form 14 Designation of Matter to be included in the Record on Appeal
2. Respondent's Reply to Appellant's Initial Briefs
3. Proof of Service of the Reply Brief;

By copy of this letter all counsel of record are being served with the same. Should you have any questions or need any further information, please do not hesitate to contact my office.

Sincerely,

McGuireWoods LLP



T. Richmond McPherson, III
Attorney

Enclosures

cc: All parties of record

April 25, 2024

Via US MAIL

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

RECEIVED
APR 29 2024
SC Court of Appeals

Re: Deutsche Bank Trust Company Americas v. Ashley Johnson Beshara et al.
Civil Action No.: 2019-CP-10-4503

Dear Mrs. Kitchings:

Please find attached the following with regard to the above case.

1. One bound copy of Respondent Deutsche Bank Trust Company Americas' Reply to Appellants Curtis and Julie Rogers" and Ashley Beshara's Initial Briefs.

By copy of this letter all counsel of record have been served with the same. Should you have any questions, please do not hesitate to contact our office.

Sincerely,

McGuireWoods LLP



T. Richmond McPherson, III
Attorney

TRM/csc

Enclosures:



quadrant

FIRST-CLASS MAIL
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US POSTAGE

From: RICHMOND MCPHERSON

McGuireWoods

201 N. Tryon St. | Suite 3000
Charlotte, NC 28202-2146

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

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