

**From:** [Theron Coetzee](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Dean Hayes](#); [Jeff Barnes](#); [WILLIAM SLOAN](#); [jtaylor@mtglaw.com](#)  
**Subject:** RE: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /  
**Date:** Tuesday, September 10, 2024 3:36:35 PM  
**Attachments:** [Proof of Service.pdf](#)

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Good afternoon,

Please see attached Appellant's Proof of Service for the Motion to Extend Deadline to Serve and File Reply Brief.

Please let us know if anything additional is needed.

Thank you,



McCABE, TROTTER & BEVERLY, P.C.

Theron Coetzee-Outing  
Paralegal  
4500 Fort Jackson Blvd.  
Suite 335  
Columbia, SC 29209  
Telephone: (803) 724-5000  
Fax: (803) 724-5001

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**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Sent:** Tuesday, September 10, 2024 8:43 AM  
**To:** Theron Coetzee <Theron.Coetzee@mccabetrotter.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Dean Hayes <Dean.Hayes@mccabetrotter.com>; Jeff Barnes <jeff@wjbarneslaw.com>; WILLIAM SLOAN <whs@sloanlawfirm.net>; jtaylor@mtglaw.com  
**Subject:** RE: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Theron Coetzee <[Theron.Coetzee@mccabetrotter.com](mailto:Theron.Coetzee@mccabetrotter.com)>  
**Sent:** Tuesday, September 10, 2024 7:46 AM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Dean Hayes <[Dean.Hayes@mccabetrotter.com](mailto:Dean.Hayes@mccabetrotter.com)>; Jeff Barnes <[jeff@wjbarneslaw.com](mailto:jeff@wjbarneslaw.com)>; WILLIAM SLOAN <[whs@sloanlawfirm.net](mailto:whs@sloanlawfirm.net)>; [jtaylor@mtglaw.com](mailto:jtaylor@mtglaw.com)  
**Subject:** FW: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

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Good morning,

I apologize for the 2<sup>nd</sup> email, but it looks like I left off the Court of Appeals on my email from yesterday afternoon when replying all.

Please see attached Appellant's Reply Brief and Proof of Service for filing.

Thank you,



McCABE, TROTTER & BEVERLY, P.C.

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---

**From:** Theron Coetzee  
**Sent:** Monday, September 9, 2024 3:59 PM  
**To:** 'Jeff Barnes' <[jeff@wjbarneslaw.com](mailto:jeff@wjbarneslaw.com)>; WILLIAM SLOAN <[whs@sloanlawfirm.net](mailto:whs@sloanlawfirm.net)>  
**Cc:** Dean Hayes <[Dean.Hayes@mccabetrotter.com](mailto:Dean.Hayes@mccabetrotter.com)>; [jtaylor@mtglaw.com](mailto:jtaylor@mtglaw.com)  
**Subject:** RE: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

Good afternoon,

Please see attached Appellant's Reply Brief and Proof of Service for filing.

Please let us know if anything additional is needed.

Thank you,



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---

**From:** Jeff Barnes <[jeff@wjbarneslaw.com](mailto:jeff@wjbarneslaw.com)>

**Sent:** Monday, September 9, 2024 1:15 PM

**To:** Theron Coetzee <[Theron.Coetzee@mccabetrotter.com](mailto:Theron.Coetzee@mccabetrotter.com)>; WILLIAM SLOAN <[whs@sloanlawfirm.net](mailto:whs@sloanlawfirm.net)>

**Cc:** Dean Hayes <[Dean.Hayes@mccabetrotter.com](mailto:Dean.Hayes@mccabetrotter.com)>; [jtaylor@mtglaw.com](mailto:jtaylor@mtglaw.com)

**Subject:** RE: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

I have no issue with this 1-week extension request but Mr. Sloan will have to confirm.

You can represent in your Reply Brief that we have agreed not to pursue the issue of no references in your Brief to the Record on Appeal is no longer an issue. I called the COA on this and they advised that their procedure is that once the "first" set of briefs are filed, it is then that the Record is prepared, and then we submit a second set of briefs with citations to "R. (page number(s))".

I have done appeals all over the US for almost 30 years and apparently this is a procedure unique to SC. In all other appeals I have done, record references go into one brief when filed.

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***Jeff Barnes, Esq., Licensed in Florida and Colorado; member of the United***

**States Courts of Appeal for the Third, Sixth, Ninth, Tenth, and Eleventh  
Circuits (Federal)**

**Mailing address, telephone number, and fax: 1515 North Federal Highway,  
Suite 300, Boca Raton, Florida 33432; Tel: (561) 864-1067;  
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**Lead Assistant: Tiffany Goldwater; e-mail: [tiffany@wjbarneslaw.com](mailto:tiffany@wjbarneslaw.com)**

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**From:** Theron Coetzee <[Theron.Coetzee@mccabetrotter.com](mailto:Theron.Coetzee@mccabetrotter.com)>

**Sent:** Monday, September 09, 2024 7:11 AM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; WILLIAM SLOAN <[whs@sloanlawfirm.net](mailto:whs@sloanlawfirm.net)>

**Cc:** Dean Hayes <[Dean.Hayes@mccabetrotter.com](mailto:Dean.Hayes@mccabetrotter.com)>; [jtaylor@mtglaw.com](mailto:jtaylor@mtglaw.com); Jeff Barnes  
<[jeff@wjbarneslaw.com](mailto:jeff@wjbarneslaw.com)>

**Subject:** RE: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, /  
APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

Good morning,

Please see attached Appellant's Motion to Extend Deadline to Serve and File Reply Brief. Our office has requested and will be sending a check for the \$50 motion fee.

Please let us know if anything additional is needed from our office.

Thank you,



McCABE, TROTTER & BEVERLY, P.C.

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Sent:** Friday, August 30, 2024 9:09 AM

**To:** WILLIAM SLOAN <[whs@sloanlawfirm.net](mailto:whs@sloanlawfirm.net)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Theron Coetzee <[Theron.Coetzee@mccabetrotter.com](mailto:Theron.Coetzee@mccabetrotter.com)>  
**Cc:** Dean Hayes <[Dean.Hayes@mccabetrotter.com](mailto:Dean.Hayes@mccabetrotter.com)>; [jtaylor@mtglaw.com](mailto:jtaylor@mtglaw.com); [jeff@wjbarneslaw.com](mailto:jeff@wjbarneslaw.com)  
**Subject:** RE: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** WILLIAM SLOAN <[whs@sloanlawfirm.net](mailto:whs@sloanlawfirm.net)>  
**Sent:** Friday, August 30, 2024 9:03 AM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Theron Coetzee <[Theron.Coetzee@mccabetrotter.com](mailto:Theron.Coetzee@mccabetrotter.com)>  
**Cc:** Dean Hayes <[Dean.Hayes@mccabetrotter.com](mailto:Dean.Hayes@mccabetrotter.com)>; [jtaylor@mtglaw.com](mailto:jtaylor@mtglaw.com); [jeff@wjbarneslaw.com](mailto:jeff@wjbarneslaw.com)  
**Subject:** Re: 2024-122, U.S. Bank Trust NA as Trustee for Waterfall Victoria Grantor Trust II, / APPEAL: US Bank v. Jamie Singleton & Indigo Pointe Homeowners' /

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good morning: Attached, please find the Respondent's Reply Brief in this case along with a Certificate of Service for same.

Please let us know if you have any questions or need anything to file with this case. Thank

William H. Sloan

Sloan Law Firm PA  
Post Office Box 85

1055-F North Main St.  
Summerville, SC 29484 (29483)  
843-873-7531  
Fax 843-873-7527

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