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Jan 17 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Ben N. Miller, III, Special Referee

Appellate Case No. 2024-001062
Case No. 2017-CP-40-01687

Deutsche Bank National Trust Company, as Trustee for Home
Equity Mortgage Loan Asset-Backed Trust, Series SPMD 2002-B,
Home Equity Mortgage Loan Asset-Backed Certificates, Series
SPMD 2002-B under the Pooling and Servicing agreement dated
Sept. 1, 2002Respondent,

v.

Janet L. Nelums a/k/a Janet Nelums, Christopher Nelums, Imperial
Warehouse Finance, Inc., and Best Distributing Company, Defendants,

of which Janet L. Nelums and Christopher Nelums are the Appellants.

Respondent’s Designation of Matter to be Included in the Record on Appeal

Respondent Deutsche Bank National Trust Company, as Trustee for Home Equity
Mortgage Loan Asset-Backed Trust, Series SPMD 2002-B, Home Equity Mortgage Loan
Asset-Backed Certificates, Series SPMD 2002-B under the Pooling and Servicing agreement dated
Sept. 1, 2002 (“DBNTC”) designates the following be included in the Record on Appeal.
Undersigned counsel certifies, under Rule 209(c), SCACR, that the designation contains no matter
which is irrelevant to this appeal.

Orders

1. Writ of Assistance (Special Referee Miller), filed September 11, 2024

2. Rule to Show Cause, filed August 20, 2024
3. Order of Reference to Special Referee Ben N. Miller filed, January 9, 2024
4. Gatekeeper Order (Judge Curtis), filed October 31, 2023
5. Recusal Order of Special Referee Tzerman, filed November 16, 2022
6. Order of Judgment and Foreclosure Sale (Special Referee Tzerman), filed July 1, 2021
7. Order on Appeal Bond (Special Referee Tzerman), filed July 1, 2021
8. Consent Order Restoring the Case and Referring to Special Referee Tzerman, filed March 22, 2017
9. Order Granting Motion for Judgment on the Pleadings (Judge Hocker) (2013-CP-40-03334), filed July 16, 2015
10. Order of Recusal of Judge Strickland (2013-CP-40-03334), filed November 13, 2014
11. Order of Reference to Judge Strickland (2013-CP-40-03334), filed February 18, 2014

Pleadings

12. DBNTC's Summons & Complaint, filed June 6, 2013
13. Nelumses' Answer and Counterclaim, filed July 1, 2013

Motions, Supporting Memoranda, & Other Filings

14. Nelumses' Summons & Complaint (without attachments), Case No. 3:24-cv-04898-MGL (D.S.C. Sept. 9, 2024)
15. Special Referee's Report on Sale (Special Referee Miller), filed May 15, 2024
16. Special Referee's Deed (Special Referee Miller), filed May 13, 2024
17. Affidavit of Service, filed October 21, 2024
18. Nelumses' Pro Se Motions, filed March 24, 2024
19. Special Referee's Notice of Sale (Special Referee Miller), filed February 20, 2024
20. DBNTC's Motion for Sanctions, including all non-duplicate exhibits, filed February 27, 2022
 - a. Exhibit 1: Relevant Court Dockets

- b. Exhibit 4: Bankruptcy Order on Summary Judgment, filed March 17, 2020
 - c. Exhibit 5: Bankruptcy Court's Order Denying Motion, filed May 22, 2020
 - d. Exhibit 6: Bankruptcy Court's Order Dismissing Bankruptcy, filed April 21, 2020
 - e. Exhibit 7: Federal Magistrate's Report & Recommendation, filed August 31, 2021
 - f. Exhibit 8: Federal District Court's Order Adopting Report & Recommendation, filed February 2, 2022
 - g. Exhibit 9: Fourth Circuit's Unpublished Opinion Affirming, filed June 27, 2022
21. DBNTC's Motion for Judgment on the Pleadings as to Defendants' Counterclaims, excluding exhibits, filed July 7, 2014

Other

- 22. Notice of Appeal, filed June 25, 2024
- 23. Record of Hearing, filed June 4, 2021

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Columbia, South Carolina
January 17, 2025