

THE LAW OFFICE OF
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May 15, 2025

Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED
May 15 2025
SC Court of Appeals

**RE: Deutsche Bank Trust Company Americas, as Trustee v. Ashley
Johnson Beshara as Trustee, et al
App. Case No. 2023-001844**

Madam Clerk:

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

- 1) Appellant's Motion to Supplement the Record on Appeal with an Appendix;
- 2) Proof of Service for the Motion; and
- 3) Check for \$50.00 for the filing fee has already been received by the Court.

I kindly request that you file the same

With kind regards,

RESPECTFULLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC



D. Conor Keys (100148)
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Phone: 843-906-3998
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Attorney for Appellant

Enclosures:
(as stated)

IN 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

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, Defendants,

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

AND

Ashley Johnson Beshara 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, Curtis Rogers, and Julie Rogers.....Third-Party Defendant

MOTION TO SUPPLEMENT THE RECORD ON APPEAL WITH AN APPENDIX

Appellant, Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for
2235 Shoreline Drive originally dated the 3rd day of March 2010 (hereinafter "Appellant"), by and
through her undersigned counsel, hereby moves before this Court for an order granting Appellant
permission to file an Appendix to the Record on Appeal to correct omissions and/or a clerical error
which occurred in the filing of the original Record on Appeal. The grounds for the motion are
as follows:

1. Appellant served the record on Appeal on all other parties in this matter on February 20, 2025, and filed the Record on Appeal on March 17, 2025. Thereafter, Appellant filed Appellant's final brief in this matter and in the course of doing so, it came to Appellant's attention, the following documents were omitted from the compiled record:

a) Exhibit "A" to All Appellants' joint memorandum in opposition to Summary Judgment with Exhibits filed on February 9, 2023¹;

b) Respondent Deutsche's Return to the Appellants, the Roger's Motion to Intervene filed July 9, 2020²; and

c) Respondent Deutsche's Return to Appellant's Motion to Reconsider filed July 9, 2020³.

2. Because only Appellant and not another party cited to these omitted records in Appellant's final briefs, Appellant would respectfully assert the other parties to this Appeal are not prejudiced by the Record being amended to include an appendix. Additionally, because Appellant already cited to Amended Record citations in Appellant's final brief, Appellant would not need to amend Appellant's final brief if this motion were granted. Therefore, Appellant would respectfully assert that granting this motion does not cause further delay. A copy of the proposed Appendix to the Record on Appeal is attached hereto and incorporated herein by reference.

¹ Appellant identified this Memorandum with its accompanying exhibits as designation number 44 in Appellant's designation of matter filed March 25, 2024. The Memorandum, along with exhibits "B" and "C" were included in the Record; however, by clerical error, exhibit "A" was not included in the Record. Neither the Appellants, the Rogers nor the Respondents, Deutsche nor Nationstar, designated this Memorandum and exhibits in their respective designations of matter, so supplementing the Record with an appendix does not require alteration of their final briefs. By contrast, Appellant cited to Exhibit "A" 6 times in Appellant's final brief (see Final Brief Record citations pages 2, 3, 4, 5, and 18 (Am. R. pp. 1055-1072)

² No party to this appeal identified this Return in their Respective Designation of Matters. However, Appellant did cite to this Return once in her Initial and Final Brief (page 7 Am. R. pp. 1078-1080)

³ No party to this appeal identified this Return in their Respective Designation of Matters. However, Appellant did cite to this Return once in her Initial and Final Brief (page 7 Am. R. pp. 1073)

5. Therefore, Appellant respectfully requests that this Court issue an order allowing Appellant to file an Appendix to the Record on Appeal to include three documents omitted from the original Record on Appeal by error.

May 15, 2025.

RESPECTFULLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC
s/ D. Conor Keys

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Attorney for Appellant

Ashley Johnson Beshara as Trustee

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2019-CP-10-4503
Appellate Case No. 2023-001844

Deutsche Bank Trust Company Americas, as Trustee for Residential Accredited
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 Beshara as Trustee of the
Revocable Trust Agreement for 2235 Shoreline Drive originally dated 34d day of
March 2010 are theAppellants,

AND

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

v.

Nationstar Mortgage, LLC,.....Respondent.

CERTIFICATE OF SERVICE

I certify that on this 15th day of May 2025, I have served Appellant’s Motion to Amend the
Record on Appeal to include an Appendix upon all other counsel of record at the email address
listed for said counsel on AIS as follows:

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Americas, as Trustee for Residential Accredited
Loans, Inc., Pass-Through Certificates 2007-QH2
and Nationstar Mortgage LLC*

May 15, 2025,

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*Attorney for Appellant
Ashley Johnson Beshara as Trustee*

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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Bentley Price, Circuit Court Judge

Case No. 2017-CP-10-5426
Appellate Case No. 2020-001132

Family Services, Inc., as Conservator for Muriel W. Clarkin.....Appellant,

v.

Bridget D. Inman, Muriel C Kennedy, and Patricia Clarkin Smith..... Respondents.

CERTIFICATE OF SERVICE

I certify that on this 27th day of January 2023, I have served an electronic copy of Appellant's Motion to supplement the record on appeal upon all counsel of record via counsel's email as listed on AIS.

Michael P. O'Connell

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Former Attorney for Bridget D. Inman

January 25, 2023.

THE LAW OFFICE OF
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