

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity

Appellate Case No.: 2013-001508

RECEIVED
OCT 30 2013
SC COURT OF APPEALS

Wells Fargo Bank, N.A. as Trustee
For Option One Mortgage Loan
Trust 2000-D, Asset Backed
Certificate, Series 200-D,.....Appellant,

v.

Mooring Secured Liquidity; Randy S.
Rutherford; Tara P. Rutherford;
Spartanburg County Tax Collector;
Sherman Acquisitions, LP,.....Respondents.

**RESPONDENT MOORING SECURED LIQUIDITY'S
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**


Respondent Mooring Secured Liquidity proposes the following be included in the Record
on Appeal:

1. Order of April 20, 2012;
2. Order of March 6, 2013;
3. Order of June 11, 2013;
4. Complaint;
5. Answer and Counterclaim of Mooring Secured Liquidity;
6. Answer and Counterclaim of Randy S. Rutherford and Tara P. Rutherford;

7. Answer and Counterclaim of Spartanburg County Tax Collector;
8. Reply to Counterclaim of Randy S. and Tara P. Rutherford;
9. Reply to Counterclaim of Mooring Secured Liquidity;
10. Plaintiff's Motion for Summary Judgment;
11. Plaintiff's Memorandum of Law in Support of Setting Aside Tax Sale;
12. Plaintiff's Motion To Alter or Amend;
13. Transcript of Proceedings of February 12, 2013 pp. 6-33;
14. Plaintiff's Trail Exhibits 1,2,3,4,5,6,7,8,9,10,11,12;

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

October 28, 2013



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ALEXANDER P. LEWIS (SC Bar #78991)
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ATTORNEYS FOR RESPONDENT
MOORING SECURED LIQUIDITY

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PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent Mooring Secured Liquidity's Designation of Matter to be Included in the Record on Appeal by depositing a copy of it in the United States Mail, postage prepaid, on October 28, 2013, addressed to:


Sean M. Foerster, Esquire
Rogers Townsend & Thomas, P.C.
P.O. Box 100200
Columbia, SC 29202

Michael W. Smith, Esquire
Baker, Donelson, Bearman,
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October 28, 2013



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October 28, 2013

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

OCT 30 2013

SC Court of Appeals

Re: *Wells Fargo Bank, N.A. v. Mooring Secured Liquidity, et al.*
Appellate Case No. 2013-001508
Civil Action No. 2010-CP-42-5798

Dear Ms. Kitchings:

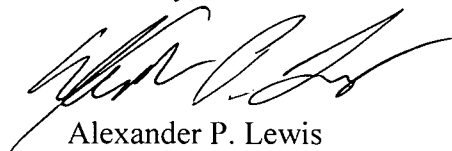
Enclosed please find an original and two (2) copies of the Initial Brief of Respondent Mooring Secured Liquidity and Designation of Matter, along with Certificates of Service for each.

Please return the filed copies to me in the enclosed, self-addresses, postage pre-paid envelope provided for your convenience.

By copy of this letter, I am serving copies of the Initial Brief of Respondent Mooring Secured Liquidity, Designation of Matter, and Certificates of Service on all parties to this appeal.

Thank you,

Sincerely,



Alexander P. Lewis

Enclosures

cc: Sean M. Foerster, Esquire
David G. Ingalls, Esquire
Michael W. Smith, Esquire
John Harris, Esquire