

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

The Honorable W.T. Geddings, Jr., Special Referee  
Civil Action No. 2023-CP-08-00547

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Appellate Case No. 2025-001547

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US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, .....Respondent.

v.

Betty J. Moultrie aka Betty J. Shine, Individually and as Personal Representative of the Estate of Bradford Moultrie aka Bradford Willie Moultrie; The Personal Representative, if any, whose name is unknown, of the Estate of Corinth Moultrie; Bradford Moultrie aka Bradford Moultrie, II; and any other Heirs-at-Law or Devises of Bradford Moultrie aka Bradford Willie Moultrie, Deceased, and Corinth Moultrie, Deceased, their heirs, Personal Representatives, Administrators, Successors and Assigns, and all other persons entitled to claim through them; all unknown persons with any right, title or interest in the real estate described herein; also any persons who may be in the military service of the United States of America, being a class designated as John Doe; and any unknown minors or persons under a disability being a class designated as Richard Roe, South Carolina Federal Credit Union, and Berkeley Electric Cooperative, Inc., .....Defendants,

Of which Betty J. Moultrie is the .....Appellant.

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**PROOF OF SERVICE**

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I certify that I, M. McMullen Taylor, attorney with the law firm of Riley Pope & Laney, LLC, have this day caused to be served upon the person named below the attached **RESPONDENT’S INITIAL BRIEF and RESPONDENT’S DESIGNATION OF MATTER** in the above-captioned matter via electronic mail to counsel’s AIS email address as follows:

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*s/M. McMullen Taylor*

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Columbia, South Carolina  
November 4, 2025