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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
The Honorable Thomas J. Rode, Circuit Court Judge

Trial Court Case No. 2025-CP-08-01090
Appellate Case No. 2026-001046

Shaunise A. Nelson, Plaintiff/Appellant,

v.

Ally Financial Inc., Herbie's Towing Service, and Hook & Book Recovery SC, LLC, Defendants,

of which Ally Financial Inc. and Hook & Book Recovery SC, LLC are Respondents.

APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 209, SCACR, Appellant Shaunise A. Nelson, appearing pro se, hereby designates the following matter to be included in the Record on Appeal:

1. The circuit court's February 10, 2026 Order granting summary judgment in favor of Respondent Ally Financial Inc.
2. The circuit court's February 10, 2026 Order granting summary judgment in favor of Respondent Hook & Book Recovery SC, LLC.
3. Appellant's post-judgment motion pursuant to Rule 59(e), SCRCP, seeking reconsideration or alteration or amendment of the February 10, 2026 summary-judgment rulings, including any exhibits submitted with that motion that concern the right-to-cure notice, Appellant's address, Ally's address records, or the challenged repossession.
4. The circuit court's March 18, 2026 Order denying Appellant's Rule 59(e) post-judgment relief.
5. The transcript of the December 16, 2025 summary-judgment hearing before the Honorable Thomas J. Rode, including the portions addressing the alleged default, notice and opportunity to cure, Appellant's address, Exhibit I, Ally's knowledge or use of an updated address, Ally's asserted right to repossess, and the parties' arguments concerning summary judgment.

6. Ally Financial Inc.'s motion for summary judgment and supporting memorandum, affidavits, exhibits, and other materials presented to the circuit court in support of summary judgment, to the extent relevant to the issues presented in this appeal, including materials concerning the alleged default, right-to-cure notice, address to which notice was sent, Ally's records concerning Appellant's address, and Ally's asserted right to repossess the vehicle.
7. Hook & Book Recovery SC, LLC's motion for summary judgment and supporting memorandum, affidavits, exhibits, and other materials presented to the circuit court in support of summary judgment, to the extent relevant to the issues presented in this appeal, including materials concerning its asserted authority to repossess the vehicle and the right to possession upon which the repossession was based.
8. Appellant's responses and opposition to the motions for summary judgment, together with the exhibits and other materials presented to the circuit court in opposition to summary judgment that concern the right-to-cure notice, Appellant's address, Ally's address records, Ally's authority to repossess, and the repossession of Appellant's vehicle.
9. Appellant's April 21, 2025 Motion to Reconsider and accompanying Declaration of Shaunise A. Nelson, including the portions addressing the alleged right-to-cure notices, the address to which notice was allegedly sent, Appellant's updated residential address, and Appellant's assertion that she updated her residential address through Ally's official mobile application.
10. Appellant's April 24, 2025 filing containing exhibits relevant to the issues on appeal, specifically including Exhibit I and the Ally-related billing/address documentation and "Vehicle Information" materials identifying 2253 Ranger Dr., Cross, South Carolina 29436-3395 as the Vehicle Billing Address.
11. The right-to-cure/default notice dated December 10, 2024 upon which Ally relied in support of its asserted right to repossess, together with any proof of mailing, affidavit, account record, or other material presented to the circuit court concerning the address to which that notice was mailed.
12. Any Ally account statements, account records, address records, mobile-application records, or other Ally-generated materials that were presented to the circuit court and that reflect Appellant's residential, mailing, billing, or vehicle billing address, to the extent relevant to determining when Ally possessed or used Appellant's updated address.
13. Any affidavit of an Ally employee or custodian presented to the circuit court in support of summary judgment concerning Appellant's alleged default, the December 10, 2024 notice, the mailing of that notice, Appellant's address of record, or Ally's repossession of the vehicle.
14. Such portions of the pleadings in the underlying action as are necessary to identify the claims and defenses resolved by the February 10, 2026 summary-judgment orders and that are relevant to the issues presented in this appeal, including Appellant's operative

complaint and the operative answers of Ally Financial Inc. and Hook & Book Recovery SC, LLC.

Appellant designates only materials that were presented to the lower court and that are relevant to the issues presented in this appeal.

Respectfully submitted,

s/ Shaunise A. Nelson
Shaunise A. Nelson, Pro Se
P.O. Box 103
Ridgeville, South Carolina 29472
(843) 718-7930
shaunise.nelson@gmail.com

September 30, 2026
Ridgeville, South Carolina

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CERTIFICATE OF SERVICE

I certify that on September 30, 2026, I served a true and correct copy of the foregoing Appellant's Designation of Matter to Be Included in the Record on Appeal upon counsel of record for Respondents by depositing copies in the United States Mail, postage prepaid, addressed to counsel at the addresses set forth below, and by transmitting courtesy copies by email to the email addresses set forth below:

George Benjamin Milam, Esq.
214 North Tryon Street
Suite 3700
Charlotte, North Carolina 28202
Attorney for Respondent Ally Financial Inc.
Email: bmilam@bradley.com

Noah Riley Matthews, Esq.
214 North Tryon Street
Charlotte, North Carolina 28202
Attorney for Respondent Ally Financial Inc.
Email: nmatthews@bradley.com

William A. Dennis, Jr., Esq.
P.O. Box 993
Charleston, South Carolina 29402
Attorney for Respondent Hook & Book Recovery SC, LLC
Email: bdennis@ycrlaw.com

Stephen L. Brown, Esq.
P.O. Box 993
Charleston, South Carolina 29402
Attorney for Respondent Hook & Book Recovery SC, LLC
Email: sbrown@ycrlaw.com

Graydon V. Olive IV, Esq.
P.O. Box 993
Charleston, South Carolina 29402
Attorney for Respondent Hook & Book Recovery SC, LLC
Email: golive@ycrlaw.com

s/ Shaunise A. Nelson
Shaunise A. Nelson
Appellant, Pro Se