

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2011-CP-40-6103

**RECEIVED**

APR 04 2014

**SC Court of Appeals**

Bank of New York Mellon Trust Company,  
National Association f/k/a The Bank of New York  
Trust Company, N.A. as successor to JPMorgan Chase  
Bank N.A. s/b/m Bank One National Association as  
Trustee for RAMP 2002RS5 ..... Plaintiff,

v.

Chartrese Grier, Palmetto Health Alliance;  
and Palmetto Richland Memorial ..... Defendants,

v.

Chartrese Grier ..... Appellant,

v.

Nationwide Property & Casualty Insurance  
Company; and Tonya D. Parks ..... Respondents.

DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

1. Complaint (Non-Jury Mortgage Foreclosure), filed Sept. 14, 2011 – CA No. 2011-CP-1603.
2. Mortgage, Incorporated by Reference in Complaint, Recorded in Richland Cty. Reg. Deeds Book 00660-2316.
3. Answer and Third-Party Complaint, filed November 22, 2011.
4. Answer to Third-Party Complaint, filed February 6, 2012.

5. Motion to Amend Answer and Third-Party Complaint, filed June 11, 2012.
6. Proposed Amended Answer and Third-Party Complaint, filed June 11, 2012.
7. Third-Party Defendants' Supplemental Memorandum in Opposition to Defendant/Third-Party Plaintiff Chartreuse Grier's Motion to Amend Answer and Third-Party Complaint with Supporting Exhibits, filed November 28, 2012.
8. Reply to Third-Party Defendants' Memorandum in Opposition to Chartreuse Grier's Motion to Amend with Supporting Exhibits, filed December 6, 2012.
9. Third-Party Defendants' Memorandum in Opposition to Plaintiff's Motion to Sever with Supporting Exhibits, filed November 8, 2012.
10. Third-Party Plaintiff's Motion for Summary Judgment, dated November 2, 2012.
11. Brief in Support of Third-Party Plaintiff's Motion for Summary Judgment and Supporting Exhibits, filed November 9, 2012.
12. Third-Party Defendants' Supplemental Memorandum in Opposition to Grier's Motion for Summary Judgment and Supporting Exhibits, filed November 13, 2012.
13. Third-Party Defendants' Motion for Summary Judgment and Supporting Exhibits, dated November 6, 2012.
14. Third-Party Defendants' Supplemental Memorandum in Support of Motion for Summary Judgment and Supporting Exhibits, Filed November 13, 2012.
15. Third-Party Plaintiff's Response to Third-Party Defendants' Supplemental Memoranda Supporting and Opposing Summary Judgment and Supporting Exhibits, filed November 26, 2012.
16. Deposition of Tonya Parks (Excerpts and Exhibits).
17. Affidavit of Tonya Parks.
18. Deposition of Chartreuse Grier (Excerpts and Exhibits).
19. Deposition of Jeanette Bauerle (Excerpts and Exhibits).
20. Motion for Protective Order to Preclude Second Deposition of Nationwide Property & Casualty Insurance Company, Filed November 16, 2012.
21. Proposed Consent Scheduling Order, dated October 23, 2012.
22. Notice of 30(b)(6) Deposition to Nationwide Property & Casualty Insurance Co., dated November 2, 2012.

23. Nationwide's Motion for Protective Order to Preclude Second Deposition, filed November 16, 2012.
24. Transcript of Record, Hearing of November 28, 2012.
25. Order of November 29, 2012.
26. Order of April 4, 2013.
27. Motion to Alter or Amend and/or for Reconsideration, filed April 25, 2013.
28. Order of September 23, 2013, denying Motion for Reconsideration.
29. Notice of Appeal, dated October 29, 2013.

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

March 26, 2014



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Attorneys for Respondents, Nationwide Property & Casualty Insurance Company and Tonya D. Parks.

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Bank of New York Mellon Trust  
Company, National Association f/k/a  
The Bank of New York Trust  
Company, N.A. as successor to JP  
Morgan Chase Bank N.A. s/b/m Bank  
One National Association as Trustee  
for RAMP 2002RS5,

Plaintiff,

v.

Chartrease Grier, Palmetto Health  
Alliance; and Palmetto Richland  
Memorial,

Defendants.

Chartrease Grier,

Appellant,

v.

Nationwide Property &  
Casualty Insurance Company;  
and Tonya D. Parks,

Respondents.

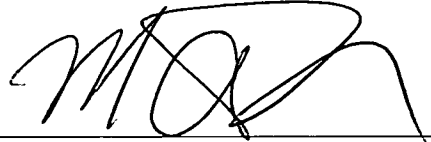
**PROOF OF SERVICE**

The undersigned hereby certifies that she is the attorney for the Appellant, Chartrease Grier, in the above-referenced matter and that she has served copies of the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal upon the attorneys for the Respondents, by depositing copies of the same in the United States Mail, on the 26<sup>th</sup> day of March, 2014, with sufficient postage annexed thereto, addressed as follows:

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March 26, 2014



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26 March 2014  
VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Bank of New York Mellon Trust v. Chartreuse Grier  
Appellate Case No.: 2013-002403

Dear Ms. Kitchings:

Please find enclosed herein for filing the original and one (1) copy of the Initial Brief of Appellant in this matter as well as the Designation of Matter to be Included in the Record on Appeal. Also enclosed for filing is the original copy of the Proof of Service. By copy of this letter, I am serving all counsel of record with copies of same.

I would greatly appreciate your filing the original document and returning the file-stamped copy to me in the enclosed self-addressed, stamped envelope.

If you have any questions or concerns, please do not hesitate to contact me. I greatly appreciate the assistance of your office.

Sincerely,



M. Allison Moon  
allison@moonlawsc.com

Enclosures

Cc: Alana Odom Williams, Esq.  
Jay T. Thompson, Esq.

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