

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Case No.: SC Court of Appeals# 2014-000142 Lower Court# 2012CP3600484

Samantha Hendrix

Appellant,

v.

Discover Bank,

Respondent.

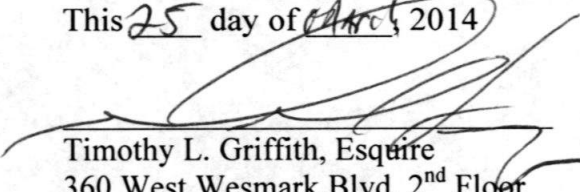
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal as well as all items designated by Appellant:

1. Experian Credit Report screen print;
2. Answer of Appellant, Defendant
3. Order denying Request to Reconsider
4. Discover Bank system screen print

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

This 25 day of April, 2014


Timothy L. Griffith, Esquire
360 West Wesmark Blvd, 2nd Floor
Sumter, SC 29154
803 607-9386
Fax: 803 607-9575
Attorney for Respondent

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MAR 27 2014

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
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APPEAL FROM NEWBERRY COUNTY Court of Common Pleas

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Samantha Hendrix, Appellant,

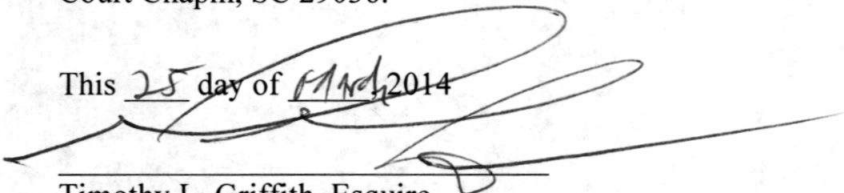
V.

DISCOVER BANK Respondent.

PROOF OF SERVICE

I certify that I have served Brief in Reply to Initial Brief of Appellant upon Appellant, Samantha Hendrix by depositing same in the United States Mail, postage prepaid on 25, day of MAR, 2014, addressed to her attorney of record, Rolf M. Bagdaddy 118 Cobblestone Court Chapin, SC 29036.

This 25 day of MAR, 2014


Timothy L. Griffith, Esquire
360 West Wesmark Blvd, 2nd Floor
Sumter, SC 29154
803 607-9386
Fax: 803 607-9575
Attorney for Respondent

Other attorney of record:
Rolf M. Bagdaddy
118 Cobblestone Court
Chapin, SC 29036
Attorney for Appellant

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SC Court of Appeals

Original

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The Honorable Jenny Abbott Kitchings Clerk, South Carolina Court of Appeals Post Office
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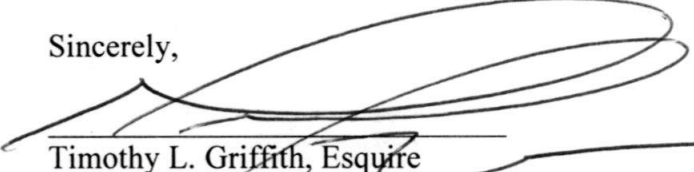
RE: Samantha Hendrix v. Discover Bank
Case No.: SC Court of Appeals# 2014-000142 Lower Court# 2012CP3600484

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of RESPONDENT's Brief in REPLY to Initial Brief of Appellant, and the corresponding proof of service to Timothy Lee Griffith, Esq.

Please return a clocked copy in the enclose SASE.

Sincerely,



Timothy L. Griffith, Esquire
360 West Wesmark Blvd, 2nd Floor
Sumter, SC 29154
803 607-9386
Fax: 803 607-9575
Attorney for Respondent

cc: Rolf M. Bagdaddy
118 Cobblestone Court
Chapin, SC 29036
Attorney for Appellant

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MAR 27 2014

SC Court of Appeals

This correspondence is from a debt collector. This is an attempt to collect a debt, and any information obtained will be used for that purpose.

Important notices appear on the back of this letter. Please read them as they may affect your rights.

NOTICES

In California: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

In Colorado: A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt. **FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE www.coloradoattorneygeneral.gov/ca**

In Kansas: An investigative consumer report, which includes information as to your character, general reputation, personal characteristics, and mode of living, whichever are applicable, may be made or obtained. Within a reasonable period of time after your receipt of this letter, upon your written request for additional information regarding the scope and nature of our investigation, complete and accurate disclosure of the nature and scope of the investigation requested will be provided.

In Massachusetts: You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the creditor.

In Minnesota: This collection agency is licensed by the Minnesota Department of Commerce.

In New York City: Dept of Consumer Affairs Lic No. 1259571 for 6 Manor Parkway, Salem NH 03079 and Dept of Consumer Affairs Lic No. 1260977 for 50 Tower Office Park, Woburn MA 01801. For info: www.nyc.gov/consumers or 42 Broadway, New York, NY 10004.

Richard J. Boudreau & Associates, LLC (RJBA) may monitor and record telephone calls for training, quality control and compliance purposes including calls originated by, or made to RJBA.

IF YOU ARE ENTITLED TO THE PROTECTIONS OF THE UNITED STATES BANKRUPTCY CODE (11 USC §§362; 524) REGARDING THE SUBJECT MATTER OF THIS COMMUNICATION, THE FOLLOWING APPLIES TO YOU: THIS COMMUNICATION IS NOT AN ATTEMPT TO COLLECT, ASSESS, OR RECOVER A CLAIM IN VIOLATION OF THE BANKRUPTCY STAY AND IS FOR INFORMATIONAL PURPOSES ONLY.

If you pay by a paper check, authorize electronic checks or payment(s) over the phone, you are authorizing us to convert it into an electronic debit, which may clear faster, without further notice to you. You may not receive your check in your statement. If your check or payment is returned or dishonored for any reason, we may redeposit it electronically.

**FOR INQUIRIES OR COMPLAINTS, PLEASE CALL RJBA'S CONSUMER SERVICE MANAGER
TOLL-FREE 1-866-997-2449, OR SEND AN EMAIL TO complaints@rjba.com**

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6 Manor Parkway
Salem, NH 03079

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Business Hours:

8:00am-8:00pm Monday-Wednesday
8:00am-6:30pm Thursday
8:00am-5:00pm Friday

8:00am-8:00pm Monday-Wednesday
8:00am-6:30pm Thursday
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