

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

RECEIVED

JUN 26 2014

Case No. 2011-CP-40-6103
Appellate Case No. 2013-002403

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 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, Third-Party Plaintiff, Appellant,

v.

Nationwide Property & Casualty Insurance Company;
and Tonya D. Parks, Third-Party Defendants, Respondents.

**RESPONDENTS' DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Respondents Nationwide Property & Casualty
Insurance Company and Tonya D. Parks ("Respondents") designate the following
material for inclusion in the record on appeal. Undersigned counsel certifies, pursuant

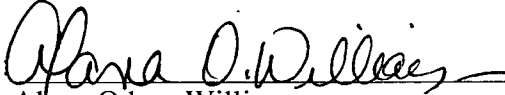
to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to the appeal:

1. Order Granting Voluntary Dismissal Without Prejudice filed November 27, 2012
2. Form 4 Order denying Nationwide and Parks' Motion to Compel filed November 29, 2012
3. Order denying Grier's Motion for Summary Judgment and granting Nationwide and Parks' Motion for Summary Judgment filed April 4, 2013
4. Order filed September 23, 2013
5. Summons, Complaint, Lis Pendens and Notice of Foreclosure Intervention filed September 14, 2011
6. Answer and Third-Party Complaint filed November 22, 2011
7. Answer to Third-Party Complaint filed February 6, 2012
8. Transcript of Hearing November 28, 2012
9. Motion for Protective Order by Third-Party Defendant Nationwide Property & Casualty Insurance Company, with exhibits, filed May 10, 2012
10. Notice of Motion and Motion to Amend Answer and Third Party Complaint, with exhibits, filed June 8, 2012
11. Third Party Defendants' Motion to Compel Proper Response to Request for Admission, with exhibits, filed July 6, 2012
12. Third-Party Defendants' Memorandum in Opposition to Defendant/Third-Party Plaintiff Chartrease Grier's Motion to Amend Answer and Third Party Complaint filed July 6, 2012
13. Plaintiff's Motion to Sever filed September 20, 2012
14. Notice of Motion and Motion for Summary Judgment filed November 2, 2012
15. Third-Party Defendants' Motion for Summary Judgment, with exhibits, filed November 6, 2012

16. Plaintiff's Motion for Entry of Default by Clerk Against Defendants Palmetto Health Alliance and Palmetto Richland Memorial, with exhibits, filed November 7, 2012
17. Third-Party Defendants' Memorandum in Opposition to Plaintiff's Motion to Sever, with exhibits, filed November 8, 2012
18. Third-Party Defendants' Opposition to Grier's Motion for Summary Judgment, with exhibits, filed November 8, 2012
19. Third-Party Defendants' Supplemental Memorandum in Support of Motion for Summary Judgment, with exhibits, filed November 13, 2012
20. Third-Party Defendants' Affidavit in Support of Summary Judgment, with exhibits, filed November 13, 2012
21. Third-Party Defendants' Supplemental Memorandum in Opposition to Grier's Motion for Summary Judgment, with exhibits, filed November 13, 2012
22. Motion for Protective Order to Preclude Second Deposition of Nationwide Property & Casualty Insurance Company filed November 16, 2012
23. Third-Party Plaintiff's Objection to Nationwide's Notice of Taking 30(b)(6) Deposition of Bank of New York filed November 19, 2012
24. Third-Party Plaintiff's Response to Third-Party Defendants' Supplemental Memoranda Supporting and Opposing Summary Judgment filed November 26, 2012
25. Third-Party Defendants' Supplemental Memorandum in Opposition to Defendant/Third-Party Plaintiff Chartreuse Grier's Motion to Amend Answer and Third-Party Complaint, with exhibits, filed November 28, 2012
26. Notice of Motion and Motion to Alter or Amend and/or for Reconsideration filed April 25, 2013
27. Third-Party Defendants' Memorandum in Opposition to Defendant/Third-Party Plaintiff Chartreuse Grier's Motion to Alter or Amend and/or for Reconsideration, with exhibits, filed May 31, 2013
28. Mortgage, incorporated by reference in Complaint, recorded on May 10, 2002 at Book 00660, Pages 2314-2332
29. Reply to Third-Party Defendants' Memorandum in Opposition to Grier's Motion to Amend

30. Joint Stipulation of Dismissal Without Prejudice with proposed order
31. Plaintiff's Affidavit of GMAC Mortgage, LLC signed November 12, 2012.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By 
Alana Odom Williams
SC Bar No. 70518
E-Mail: alana.williams@nelsonmullins.com
Elizabeth Herlong Brogdon
SC Bar No. 8281
E-Mail: elizabeth.brogdon@nelsonmullins.com
Jay T. Thompson
SC Bar No. 75030
E-Mail: jay.thompson@nelsonmullins.com
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

*Attorneys for Respondents Nationwide Property &
Casualty Insurance Company and Tonya D. Park*

Columbia, South Carolina

June 26, 2014