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Charleston, SC
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July 9, 2014

RECEIVED

JUL 09 2014

SC Court of Appeals

Via Priority Mail

Mr. Thomas Irby
P. O. Box 827
Pelzer, SC 29669

**Re: JP Morgan Chase NA v. Thomas R. Irby, Roy C. Irby a/k/a Roy C. Irby II, Bank of America, NA and Charles H. Knight LLC
Appellate Case No. 2013-001441**

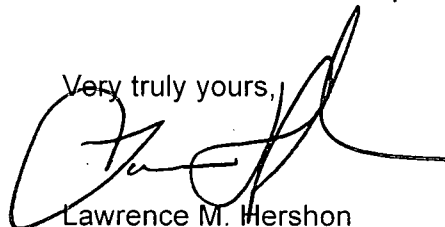
Dear Mr. Irby:

I am in receipt of your letter dated June 26, 2014, which included your Record on Appeal. Within the cover letter you reference that you are providing a copy of "My Record On Appeal." Pursuant to the South Carolina Appellate Court Rules, however, the Record on Appeal needs to not only contain the documents that you have referenced in your Designation of Matter, but must also include all documents provided in each other party's Designation of Matter. See Rule 210(c), SCACR. There are currently 40 documents from Bank of America's Designation of Matter that are not included in your Record on Appeal. Bank of America's Designation of Matter is enclosed for your reference.

Please correct and supplement the Record on Appeal to properly embody all of the documents required under Rule 210(c), SCACR. These corrections should be made immediately but no later than July 11, 2014. If necessary, please call me immediately so that this issue can be discussed.

If the Record on Appeal is not corrected accordingly, my client will have no choice but to file on July 14, 2014 a Motion for Correction of the Record on Appeal. I am providing a copy of this letter to the Clerk of the Court of Appeals so that she is aware of the pending deficiencies in the Record on Appeal.

Very truly yours,



Lawrence M. Hershon

LMH:dmc
Enclosure

cc: Honorable Jenny Abbott Kitchings, Clerk, South Carolina Court of Appeals (w/enc.)
- via Hand Delivery
Jerry A. Gaines, Esq. (w/enc.) - via U.S. Mail

PPAB 2494294v1

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Edward G. Wellmaker, Circuit Court Judge

Case No. 2010-CP-23-1621
Appellate Case No. 2013-001441

Chase Home Finance, LLC

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APR 21 2014

SC Court of Appeals

v.

Thomas R. Irby, Roy C. Irby a/k/a Roy C. Irby II and Bank of America, N.A.

Thomas R. IrbyAppellant,

Roy C. Irby a/k/a Roy C. Irby II.....Respondent,

Bank of America, N.A..... Respondent.

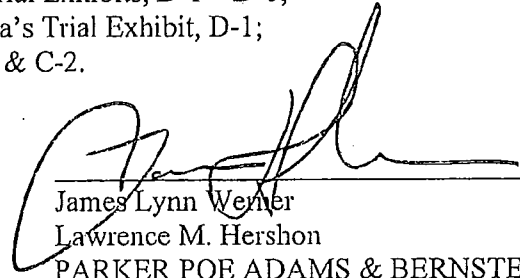
**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Respondent Bank of America, N.A. proposes the following be included in the Record on Appeal:

1. Amended Complaint, dated March 8, 2010;
2. Answer of Thomas R. Irby, dated April 8, 2010;
3. Cross-Complaint of Thomas R. Irby, dated May 18, 2010;
4. Answer of Roy C. Irby, II, dated June 4, 2010;
5. Plaintiff's Motion for Order Striking Answer of Defendant Roy C. Irby, denying jury trial and referring foreclosure to Master In Equity for final judgment, dated July 8, 2010;
6. Plaintiff's Notice of Motion and Motion to Dismiss and/or for Summary Judgment, dated July 20, 2010;
7. Bank of America's Motion to Dismiss Cross-Claim, dated July 27, 2010;
8. Order, dated September 3, 2010;
9. Defendant Bank of America's Answer to Thomas R. Irby's Cross Complaint, dated September 20, 2010;
10. Order dated September 23, 2010;

11. Defendant Bank of America's Answer to Amended Complaint, dated September 24, 2010;
12. Thomas Irby's Amendment to Clarify Cross Complaint, dated October 12, 2010;
13. Bank of America's Motion to Amend Answer to Thomas R. Irby's Cross Complaint, dated November 19, 2010;
14. Order, dated November 23, 2010;
15. Bank of America's Amended Answer to Thomas R. Irby's Cross Complaint and Cross-Claim Against Defendants Thomas R. Irby and Roy C. Irby a/k/a Roy C. Irby II, dated December 6, 2010;
16. Roy C. Irby's Reply to Bank of America's Cross-Claim, dated January 13, 2011;
17. Defendant Roy C. Irby a/k/a Roy C. Irby II's Reply to Thomas R. Irby's Cross Complaint and Cross-Claim, dated January 14, 2011;
18. Thomas R. Irby's Answer to Bank of America's Cross-Claim Against Defendants, dated January 21, 2011;
19. Amendment to Thomas Irby's Answer to Bank of America's Cross-Claim Against Defendants, dated January 24, 2011;
20. Roy Irby's Cross Complaint Action Legal Suit to Reverse Sale of Home Mortgages; Motion to Squash Thomas R. Irby Cross-Claims, dated March 30, 2011;
21. Complainant Thomas Irby's General Amendment to his Cross Complaint, dated April 8, 2011;
22. Complainant Thomas Irby's Answer to Defendant Roy Irby's Cross Complaint Action, dated April 18, 2011;
23. Bank of America's Motion to Strike Thomas Irby's General Amendment to his Cross Complaint, dated May 3, 2011;
24. Cross Complainant Thomas Irby's Motion for Hearing for Formulation of Issues and Motion for Discovery Conference, dated May 4, 2011;
25. Complainant Thomas Irby's Objection to Bank of America's Motion to Strike Thomas Irby's General Amendment to his Cross Complaint, dated May 4, 2011;
26. Order, dated July 1, 2011;
27. Thomas Irby's Motion to Amend Cross-Complaint, dated July 13, 2011;
28. Roy Irby's Amended Motion, dated July 19, 2011;
29. Thomas Irby's Objection and answer to Roy Irby's amendment to his cross-complaint, dated July 27, 2011;
30. Roy Irby's Cross Complaint, dated August 12, 2011;
31. Thomas Irby's Answer and Objection to Roy Irby's Amended Cross Complaint, dated August 15, 2011;
32. Order, dated August 16, 2011;
33. Thomas Irby's General Amendment to his Cross Complaint, dated September 6, 2011;
34. Roy Irby's Amended Cross Complaint and Action against Thomas R. Irby, dated September 9, 2011;
35. Thomas Irby's Answer to Roy Irby's Amended Cross Complaint, dated September 19, 2011;
36. Bank of America's Answer to Thomas Irby's General Amendment to his Cross Complaint, dated September 23, 2011;
37. Roy Irby's Answer to Thomas Irby's General Amendment to his Cross Complaint, dated October 17, 2011;
38. Order, dated November 16, 2011;
39. Bank of America's Motion for Summary Judgment, dated December 19, 2011;

40. Bank of America's Memorandum of Law in Support of Motion for Summary Judgment, dated December 19, 2011;
41. Order, dated March 2, 2012;
42. Order of Bifurcation, dated March 5, 2012;
43. Master in Equity's Order and Judgment of Foreclosure and Sale, dated July 2, 2012;
44. Order, dated July 25, 2013;
45. Bank of America's Motion for Judgment on the Pleadings as to Thomas R. Irby's Cross-Claim for Negligence, dated May 21, 2013;
46. Verdict Forms (three), dated May 30, 2013;
47. Form 4 Order, dated May 30, 2013;
48. Transcript of Record;
49. Plaintiff's Trial Exhibits P-1 – P-12;
50. Defendant Roy C. Irby's Trial Exhibits, D-1 – D-6;
51. Defendant Bank of America's Trial Exhibit, D-1;
52. Court's Trial Exhibits, C-1 & C-2.



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Attorneys for Appellant Bank of America, N.A.

April 21, 2014
Columbia, South Carolina

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SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29211

VIA HAND DELIVERY