

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity

The Honorable Mikell Scarborough

Case No. 2010-CP-10-7992

RECEIVED

NOV 10 2014

SC Court of Appeals

Bank of America f/k/a Countrywide Home
Loans, d/b/a America's Wholesale Lending,

Respondent,

v.

Cornell L. Williams, Deborah P. Williams,
George Rodney Derrick, and Mary Scarbrough,
as Delinquent Tax Collector for Charleston County

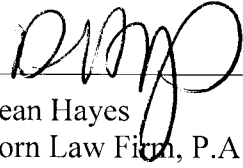
Appellant.

MOTION TO HAVE APPELLANT CITE THE RECORD

TO THE HONORABLE COURT OF APPEALS OF SOUTH CAROLINA: NOW COMES THE Respondent Bank of America f/k/a Countrywide Home Loans, d/b/a America's Wholesale Lending, pursuant to Rule 211(b) of the South Carolina Rules of Appellate Procedure, respectfully moves this Court for an order requiring Appellant to file a new final brief and cite to the Record on Appeal. Respondent contends that there are at least 18 factual assertions that require citations.

WHEREFORE, Respondent Bank of America f/k/a Countrywide Home Loans, d/b/a America's Wholesale Lending request this Court grant its Motion to Have Appellant Cite The Record.

[signature page to follow]



Dean Hayes
Korn Law Firm, P.A.
1300 Pickens Street (29201)
Post Office Box 12369
Columbia, South Carolina 29211-2369
Telephone: (803) 252-5817
Attorney for Respondent

October 31, 2014
Columbia, South Carolina

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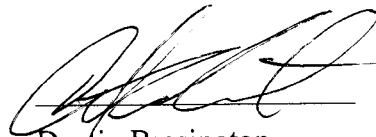
v.

Cornell L. Williams, Deborah P. Williams,
George Rodney Derrick, and Mary Scarbrough,
as Delinquent Tax Collector for Charleston County

Appellant.

PROOF OF SERVICE

I certify that I have served the Motion to Have Appellant Cite the Record on Steven L. Smith as attorney for Appellant George Rodney Derrick by depositing a copy of it in the United States Mail, postage prepaid, on November 7, 2014 addressed to Appellant at 7455 Cross Country Road PO Box 40578 Charleston, SC 29423-0578.



Dustin Brasington
Paralegal for Dean A. Hayes

November 7, 2014
Columbia, South Carolina

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November Z, 2014

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SC Court of Appeals

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Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: **Bank of America, N.A., et al. vs. Cornell L. Williams, et al.**
C/A No.: 2010-CP-10-07992
Our File No.: X10-03464

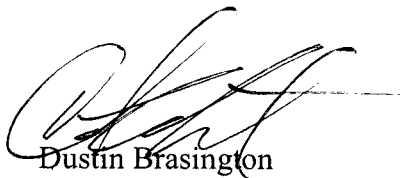
Dear Sir or Madam:

Enclosed please find an original and six (6) copies of the Respondent's Motion to Have Appellant Cite the Record and Proof of Service in the above-referenced matter. Also enclosed is a check in the amount of \$25.00 for our filing fee. Please file same and return one copy to me marked "filed" in the self-addressed, stamped envelope provided.

By copy of this letter, I am hereby serving the appellant with a copy of the above documents.

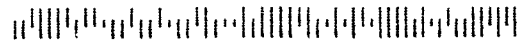
If you have any questions or should need anything further, please do not hesitate to contact me.

Sincerely,

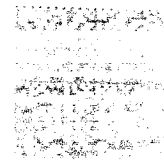


Dustin Brasington
Litigation Paralegal

Enc. (as stated)



PO Box 12369
Columbia, SC 29211



DAB

Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
1015 Sumter Street
Columbia, SC 29201