

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

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.

114362
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DEC 03 2014

SC Court of Appeals

MOTION TO SUPPLEMENT THE RECORD ON APPEAL

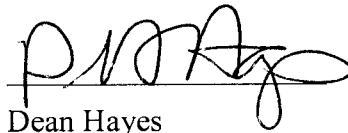
TO THE HONORABLE COURT OF APPEALS OF SOUTH CAROLINA: NOW COMES THE Respondent Bank of America f/k/a Countrywide Home Loans, d/b/a America's Wholesale Lending, pursuant to Rule 212(b) of the South Carolina Rules of Appellate Procedure, respectfully moves this Court for an order allowing Respondent to supplement the Record on Appeal with the following documents:

1. Post and Courier Proof of Publication from 1/27/2011 to 2/10/2011.
2. Proof of Service for November 19, 2010 dated 1/12/2011.
3. Appellant's Motion to Reconsider filed May 5, 2014.

Respondent requests that the Post and Courier Proof of Publication from 1/27/2011 to 2/10/2011 and Proof of Service for November 19, 2010 dated 1/12/2011 be added to the Record on the Appeal on the basis that the Post and Courier Proof of Publication as well as the Proof of Service were filed as attachments to the Order of Publication which is currently in the Record as R-20. Respondent requests that Appellant's Motion to Reconsider filed May 5, 2014 be added to the Record on Appeal on the basis that Respondent listed Appellant's Motion to Reconsider filed May 5, 2014 in Respondent's Designation of Matter for Record on Appeal.

WHEREFORE, Respondent Bank of America f/k/a Countrywide Home Loans, d/b/a America's Wholesale Lending request this Court grant its Motion Supplement the Record on Appeal.

[SIGNATURE PAGE TO FOLLOW]

A handwritten signature in black ink, appearing to read 'D. Hayes', written over a horizontal line.

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

December 2, 2014
Columbia, South Carolina

The Post and Courier

134 Columbus St., Charleston, SC 29403

Classified Ad to publish in		Post and Courier, Charleston Net			
Customer Name		PETER D KORN			
Order	465450	Class	990	Lines	77.0
Account	105425	Start Date	01/27/2011	Payments	\$0.00
Name	,	Stop Date	02/10/2011	Total Price	\$460.37
Phone	(803) 252-5817	Insertions	6	Ad Rep	Ginger Harley

State Of South Carolina
 County Of Charleston
 IN THE COURT OF
 COMMON PLEAS FOR
 THE NINTH
 JUDICIAL CIRCUIT
 C/A NO.: 2010-CP-10-7992
 Bank of America, f/k/a
 Countrywide Homes
 Loans, d/b/a America's
 Wholesale Lending, Plaintiff,

vs.
 Cornell L. Williams,
 Deborah P. Williams,
 George Rodney Derrick,
 And Mary Scarborough, as
 Delinquent Tax Collector
 for Charleston County,
 Defendants.

K10-03464
**SUMMONS AND NOTICE
 OF FILING OF
 COMPLAINT**

TO THE DEFENDANT,
 GEORGE RODNEY
 DERRICK, ABOVE
 NAMED:
 YOU ARE HEREBY
 SUMMONED and required
 to Answer the Complaint in
 the above entitled action, a
 copy of which is herewith
 served upon you, and to
 serve a copy of your
 answer upon the under-
 signed at their office, 1300
 Pickens Street, Post Office
 Box 12369, Columbia,
 South Carolina 29211, with-
 in thirty (30) days after
 service hereof upon you,
 exclusive of the day of such
 service, and if you fail to
 answer the Complaint
 within the time aforesaid or
 otherwise appear and
 defend, the Plaintiff, in this
 action will apply to the
 Court for the relief
 demanded in the
 Complaint, and judgment
 by default will be rendered
 against you for the relief
 demanded in the
 Complaint.

NOTICE IS HEREBY
 GIVEN that the original
 Complaint in the above
 entitled action was filed in
 the office of the Clerk of
 Court for Charleston
 County on September 24,
 2010.

KORN LAW FIRM, P.A.
 Dean A. Hayes,
 S.C. Bar #66066
 1300 Pickens Street
 P.O. Box 12369
 Columbia, SC 29211
 Telephone: (803) 252-5817
 Facsimile: (803) 231-2060
 ATTORNEY FOR
 PLAINTIFF

January 19th, 2011
 Columbia, South Carolina
 AD# 465450

Classified Dept. (843) 722-6500 Fax: (843) 937-5408 or 937-5410
 www.postandcourier.com

J. Al Cannon, Jr., Esq.
 Sheriff, Charleston County



Special Operations Department
 100 Broad Street
 Charleston, SC 29401-2206

Attorney or Party Without Attorney: KORN LAW FIRM P. O. BOX 12369 COLUMBIA, SC 29201-2369 Att For: BANK OF AMERICA		Telephone No. 803-252-5817	Court Use Only 2011 JAN 20 PM 12:23 FILED JULIE J. ARMSTRONG CLERK OF COURT
Name and Address of Court: CHARLESTON COUNTY COURT OF COMMON PLEAS		SHERIFF NO 8 CLPS-10015884-001	
Plaintiff: BANK OF AMERICA			
Defendant: CORNELL L. WILLIAMS, ET AL			
PROOF OF SERVICE (LIS P, SUM, COM, EXHIB)	Hearing Date 0/00/00	Time	Case Number 2010CP107992

I, J. AL CANNON, JR., ESQ., SHERIFF in and for said County and State, do hereby certify that I have received the annexed:

CIVIL ACTION OVER SHEET; CERTIFICATE OF EXEMPTION; LIS PENDENS; SUMMONS AND COMPLAINT; EXHIBITS

on the 19th day of NOVEMBER, 2010, and that I attempted service on the 11th day of JANUARY, 2011, at the hour of 1:00 PM within the County of CHARLESTON, State of SOUTH CAROLINA, as follows on:

PARTY NAME: DERRICK, GEORGE RODNEY

01/11--86 SEASIDE COTTAGE LANE RESPONDENT'S MOTHER ADVISED THAT RESPONDENT NO LONGER LIVES IN SC AND SHE WILL TRY TO GET MESSAGE TO HIM. NO UPDATE IN DMV FILES

Adr Not Served: 86 SEASIDE COTTAGE LANE
 ISLE OF PALMS, SC 29451
 ** Attempted **
 Service By HAMPTON, DEPUTY C.

SHERIFF'S FEES	Charges
SERVICE FEE	15.00
** TOTALS **	15.00

I am a SOUTH CAROLINA SHERIFF, and I certify that the foregoing is true and correct.

ATTEST OF CERTIFIED TRUE COPY
[Signature]

J. AL CANNON, JR., ESQ., SHERIFF
 COUNTY OF CHARLESTON
 STATE OF SOUTH CAROLINA

NOTARY PUBLIC SOUTH CAROLINA
 MY COMMISSION EXPIRES: 7/14/18

DATE: 1/12/11
 BY *[Signature]*

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 Bank of America f/k/a Countrywide Home)
 Loans, d/b/a America's Wholesale Lending)
)
 Plaintiff.)
)
 vs.)
)
 Cornell L. Williams, Deborah P. Williams,)
 George Rodney Derrick and Mary)
 Scarborough, as Delinquent Tax Collector for)
 Charleston County)
)
 Defendants.)

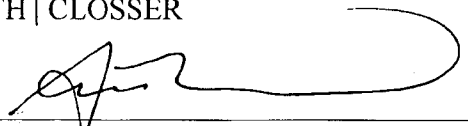
IN THE COURT OF COMMON PLEAS
 IN THE NINTH JUDICIAL CIRCUIT
 CASE NO.: 2010-CP-10-7992

Notice of Motion and
 Motion to Reconsider

FILED
 2014 MAY -5 PM 1:55
 JULIE J. ARMSTRONG
 CLERK OF COURT

YOU WILL PLEASE TAKE NOTICE, that the undersigned, as attorney for the Defendant, George Rodney Derrick, will move before Mikell R. Scarborough within ten (10) days from the service of this Motion or as soon thereafter as Counsel may be heard, for a Motion to Reconsider the Order filed on April 24, 2014. The basis of this Motion to Reconsider is that the Defendant, George Rodney Derrick, was never properly served and that the Plaintiff does not have standing to bring this action.

SMITH | CLOSSER



Steven L. Smith
 SC Bar No.: 05173
 7455 Cross County Road, Suite 1
 P.O. Box 40578
 Charleston, SC 29423-0578
 843-760-0220
 Attorney for the Defendant
 George Rodney Derrick

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 SC Court of Appeals

5-4, 2014
 Charleston, South Carolina
 14-089

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)
)
Bank of America f/k/a Countrywide Home)
Loans, d/b/a America's Wholesale Lending)
)
Plaintiff.)
)
vs.)
)
Cornell L. Williams, Deborah P. Williams,)
George Rodney Derrick and Mary)
Scarbough, as Delinquent Tax Collector for)
Charleston County)
)
Defendants.)

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT
CASE NO.: 2010-CP-10-7992

Certificate of Service

FILED
2014 MAY -5 PM 1:55
JULIE J. ARMSTRONG
CLERK OF COURT

The undersigned hereby certifies that a true and accurate copy of the foregoing Defendants' Motion to Reconsider was served this 5th day of May, via U.S. Mail, postage prepaid, upon the following:

Dean Hayes
P.O. Box 11264
Columbia, SC 29211

Daniel M. Bradley
P.O. Box 2061
Mount Pleasant, SC 29465

Bernard E. Ferrara, Jr.
Mary Scarborough
4045 Bridge View Drive
North Charleston, SC 29405

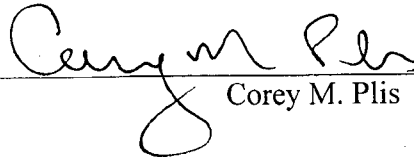
R.W. Lingerfelter
995 Morrison Drive
Charleston, SC 29403

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DEC 03 2014

SC Court of Appeals

SMITH | CLOSSER, P.A.


Corey M. Plis

5-5, 2014
Charleston, South Carolina
14-089

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

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SC Court of Appeals

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

Respondent,

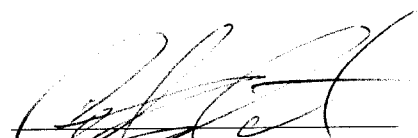
v.

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

Appellant.

PROOF OF SERVICE

I certify that I have served the Motion to Supplement the Record on Appeal 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 December 2, 2014 addressed to Appellant at 7455 Cross Country Road PO Box 40578 Charleston, SC 29423-0578.


Dustin Brasington
Paralegal for Dean A. Hayes

December 2, 2014
Columbia, South Carolina

KORN LAW FIRM, P.A.
ATTORNEYS AND COUNSELORS AT LAW
1300 PICKENS STREET
COLUMBIA, SOUTH CAROLINA 29201

MAILING ADDRESS
POST OFFICE BOX 12369
COLUMBIA, SOUTH CAROLINA 29211-2369
(803) 252-5817
FACSIMILE (803) 231-2060

December 2, 2014

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

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DEC 03 2014

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

SC Court of Appeals

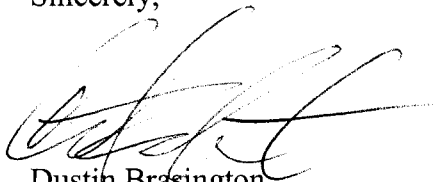
Dear Sir or Madam:

Enclosed please find an original and six (6) copies of the Respondent's Motion to Supplement the record on Appeal 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.

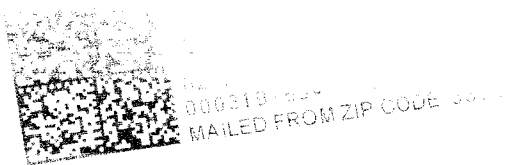
Sincerely,



Dustin Brasington
Litigation Paralegal

Enc. (as stated)

Korn Law Firm
PO Box 12369
Columbia, SC 29211



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DEC 03 2014

SC Court of Appeals

Jenny Abbott Kitchings
South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, SC 29201

DAB