

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Charles B. Simmons, Jr., Master-in-Equity Judge

Case No.: 2010-CP-CP-23-1321  
Appellate Case No.: 2014-002381

Deutsche Bank National Trust Company as  
Trustee for First Franklin Mortgage Loan  
Trust 2006-FFI Pass-Through Certificates,  
Series 2006-FFI,

Plaintiff,

v.

Dora S. Morrow, Ray Martin, and Lease and  
Rental Management Corp. d/b/a Auto Use and  
Auto Loan, a Massachusetts Corporation,  
Southern New Hampshire Bank and Trust  
Company, a New Hampshire Bank, and  
Edman Hackworth,

Defendants.

Edman Hackworth,

3<sup>rd</sup> Party Plaintiff,

v.

John Morrow

3<sup>rd</sup> Party Defendant.

John Morrow and Dora Morrow,  
3<sup>rd</sup> Party Plaintiffs,  
Of whom John Morrow is the

Appellant,

v.

Edman Hackworth and Debbie Hackworth,  
3<sup>rd</sup> Party Defendants,  
Of whom Edman Hackworth is the

Respondent.

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**SC Court of Appeals**

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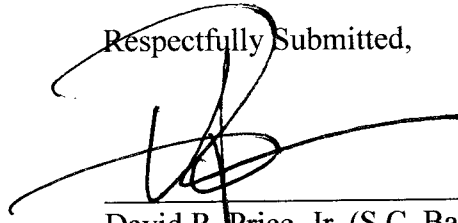
**MOTION FOR SUBSTITUTION OF PARTY**

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The undersigned does hereby move, pursuant to Rule 265(c) for an Order permitting the substitution of Appellant to the Notice of Appeal to include both John Morrow and Dora S. Morrow as Appellants.

This Motion is based upon the fact that the Notice of Appeal filed by Appellant's counsel stated that said Motion was filed by John Morrow when it should have stated that it was filed by both John Morrow and Dora S. Morrow. This omission was a clerical error resulting from the close familial relationship between John Morrow and his wife Dora S. Morrow; as well as the complex and confusing procedural history of the primary and third party actions in the lower court and questions regarding the actual parties to the settlement agreement that is the subject of this appeal; and said clerical error did not in any way mislead or prejudice Respondent, as Appellant's counsel timely identified and served all Respondents to the Appeal, and Appellant's counsel correctly identified and filed the Order(s) of the trial court that were being appealed. In addition, this motion was filed and served on Respondent's counsel soon after Appellant's counsel discovered the mistake.

Respectfully Submitted,



David R. Price, Jr. (S.C. Bar # 75140)  
**DAVID R. PRICE, JR., P.A.**  
318 West Stone Avenue (29609)  
Post Office Box 2446  
Greenville, South Carolina 29602-2446  
(864) 271-2636 office  
(864) 271-2637 fax  
David@GreenvilleLegal.com  
Attorney for the Appellants

Greenville, South Carolina  
Date: January 2, 2015

Other Counsel of Record:

Via Facsimile & U.S. Mail (864) 242-4844  
Thomas Elihue Dudley, III, Esq.  
Kenison, Dudley & Crawford, LLC  
704 E. Mcbee Ave.  
Greenville, SC 29601  
(864) 242-4899 - Office  
(864) 242-4844 - Fax  
Attorney for Respondent Edman Hackworth

Via Facsimile & U.S. Mail (864) 370-8227  
Jason James Andrighetti, Esq.  
Kehl Culbertson Andrighetti & Kornfeld, LLC  
P.O. Box 1904  
Greenville, SC 29602  
(864) 370-8222 - Office  
(864) 370-8227 - Fax  
Attorney for Appellant John Morrow

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APPEAL FROM GREENVILLE COUNTY  
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Deutsche Bank National Trust Company as Plaintiff,  
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Company, a New Hampshire Bank, and  
Edman Hackworth,

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Edman Hackworth, 3<sup>rd</sup> Party Plaintiff,

v.

John Morrow 3<sup>rd</sup> Party Defendant.

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John Morrow and Dora Morrow, Appellant,  
3<sup>rd</sup> Party Plaintiffs,  
Of whom John Morrow is the

v.

Edman Hackworth and Debbie Hackworth, Respondent.  
3<sup>rd</sup> Party Defendants,  
Of whom Edman Hackworth is the

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**PROOF OF SERVICE**

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I certify that I have served Appellant's Motion for Substitution of Party, on Counsel for Edman Hackworth, Thomas E. Dudley, III, Joseph T. Merli, Esq., Susan S. White, Esq., Matthew Tillman, Esq., Daniel Q. Orvin, Esq.; Donald E. Rothwell, Esq. and Jason James Andrighetti, Esq., by depositing a copy of it in the United States Mail with postage prepaid on January 2, 2015, as well as by via facsimile to all Counsel of Record.

Via Facsimile & U.S. Mail (864) 242-4844  
Thomas Elihue Dudley, III, Esq.  
Kenison, Dudley & Crawford, LLC  
704 E. Mcbee Ave.  
Greenville, SC 29601  
(864) 242-4899 - Office  
(864) 242-4844 - Fax  
Attorney for Defendant/3<sup>rd</sup> Party Plaintiff  
Edman Hackworth

Via Facsimile & U.S. Mail (843) 577-5135  
Joseph T. Merli, Esq.  
Susan S. White, Esq.  
Finkel Law Firm, LLC  
P.O. Box 71727  
North Charleston, SC 29415  
(843) 577-5460 – Office  
(843) 577-5135 - Fax  
Attorney for Plaintiff

Via Facsimile & U.S. Mail (843) 723-7398  
Matthew Tillman, Esq.  
Daniel Q. Orvin, Esq.  
Womble Carlyle Sandridge & Rice, LLP  
5 Exchange Street  
Charleston, SC 29401  
(843) 722-3400 – Office  
(843) 723-7398 – Fax  
Attorney for Plaintiff

Via Facsimile & U.S. Mail (803) 731-9668  
Donald E. Rothwell, Esq.  
P.O. Drawer 2789  
Irmo, SC 29063  
(803) 731-2208 – Office  
(803) 731-9668 - Fax  
Attorney for Defendants Lease and Rental  
Management Corp. d/b/ Auto Use and Auto Loan,  
a Massachusetts Corporation and Southern New  
Hampshire Bank and Trust Company, a New  
Hampshire Bank

Via Facsimile & U.S. Mail (864) 370-8227  
Jason James Andrighetti, Esq.  
Kehl Culbertson Andrighetti & Kornfeld, LLC  
P.O. Box 1904  
Greenville, SC 29602  
(864) 370-8222 - Office  
(864) 370-8227 - Fax  
Attorney for Defendants Dora Morrow and  
John Morrow

Via Facsimile & U.S. Mail (843) 725-0015  
Joseph T. Merli, Esq.  
2076 Church Creek Drive  
Charleston, SC 29414  
(843) 766-3853 – Cell  
Attorney for Plaintiff

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David R. Price, Jr. (S.C. Bar # 75140)

**DAVID R. PRICE, JR., P.A.**

318 West Stone Avenue (29609)

Post Office Box 2446

Greenville, South Carolina 29602-2446

(864) 271-2636 office

(864) 271-2637 fax

David@GreenvilleLegal.com

Attorney for the Appellant John Morrow

Greenville, SC

Date: January 2, 2015



**DAVID R. PRICE, JR., P.A.**

ATTORNEY AT LAW

January 2, 2015

The Honorable Jenny Abbott Kitchings  
**South Carolina Court of Appeals**  
Post Office Box 11629  
Columbia, South Carolina 29211

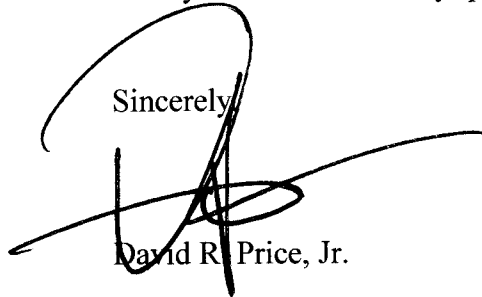
**RE: Deutsche Bank v. Dora S. Morrow**  
**Case No. 2014-002381**

Dear Ms. Kitchings:

Enclosed you will find an original and six (6) copies of a *Motion for Substitution of Party*, in connection with the above referenced appeal, along with an original and copies of a *Proof of Service*. Also enclosed is our check in the amount of **\$25.00** for the filing fee of same.

Please contact our office if you should have any questions or need further information.

Sincerely,



David R. Price, Jr.

DRP/mla

Enclosures

Cc: Client  
Thomas Elihue Dudley, III, Esq.  
Jason James Andrighetti, Esq.  
Matthew E. Tillman, Esq.  
Daniel Q. Orvin, Esq.  
Joseph T. Merlie, Esq.  
Susan S. White, Esq.  
Donald E. Rothwell, Esq.  
South Carolina Court Administration

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The Honorable Jenny Abbott Kitchings  
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P.O. Box 11629  
Columbia SC 29211-1629

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