

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

**RECEIVED**  
FEB 26 2015  
**SC Court of Appeals**

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

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 and Dora Morrow are the Appellants,

v.

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

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

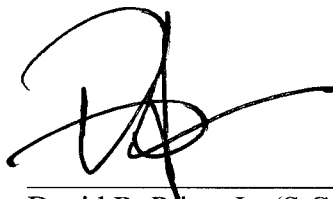
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Appellant proposes the following to be included in the Record on Appeal:

- (1) Lis Pendens, Summons, and Complaint, filed February 18, 2010
- (2) Order of Reference filed March 4, 2010
- (3) Third Party Summons and Verified Answer and Cross-Claims of Defendant Hackworth (Respondent) against Dora S. Morrow and Third Party Complaint against John Morrow, filed June 20, 2012
- (4) Summons, Answer to Crossclaim Answer to Third Party Complaint and Counterclaim (Appellant), filed July 3, 2012
- (5) Third-Party Plaintiff Hackworth's Verified Amended Reply to Counterclaim of Third Party Defendant Morrow and Third Party Defendant's Hackworth's Verified Amended Answer to Third Party Complaint of Morrrows (Respondent), filed July 30, 2012
- (6) Order Relieving Counsel and Setting Mediation (Appellant), filed December 20, 2012
- (7) Order by the Honorable Charles B. Simmons as to Claims of Third Party Plaintiff Hackworth between Defendant Dora Morrow and Defendant John Morrow, filed September 12, 2013
- (8) Defendant/Third Party Plaintiff Edman Hackworth's Motion to Enforce Settlement, filed March 24, 2014
- (9) Affidavit of Service on Dora S. Morrow (Defendant/Third-Party Plaintiff Edman Hackworth's Motion to Enforce Settlement, filed April 2, 2014
- (10) Notice of Hearing April 23, 2014 (Respondent), filed March 31, 2014
- (11) Affidavit of Service on Dora S. Morrow (Notice of Hearing), filed April 8, 2014
- (12) Transcript of Testimony from April 23, 2014 hearing on Motion to Enforce Settlement
- (13) Order of the Honorable Charles B. Simmons Granting Motion to Enforce Settlement, filed April 28, 2014

- (14) Letter dated April 30, 2014 from McDonnell and Associates attorney for Appellants, regarding short sale
- (15) Motion for Relief from Order to Enforce Settlement (Appellant), filed May 7, 2014
- (16) Defendant/Third Party Plaintiff Edman Hackworth's Motion to Allow Access, dated May 8, 2014
- (17) Email dated May 30, 2014 from Daniel Orvin to Judge Simmons regarding short sale
- (18) Notice of Appearance by Counsel for Deutsche Bank, filed June 16, 2014
- (19) Defendant/Third Party Plaintiff Edman Hackworth's Motion Seeking Contempt against Defendant Dora S. Morrow and Motion to Enforce Settlement as to Plaintiff Deutsche Bank, dated August 14, 2014
- (20) Affidavit of Defendant/Third Party Plaintiff Edman Hackworth in Support of Motion Seeking Contempt and Motion Enforcing Settlement, dated August 12, 2014
- (21) Rule to Show Cause (Respondent), filed August 20, 2014
- (22) Return to Rule to Show Cause (Appellant), filed August 29, 2014
- (23) Transcript of Testimony from September 19, 2014 hearing on Motion Contempt against Mrs. Morrow; Motion to Reconsider and Order to Enforce Agreement
- (24) Order of the Honorable Charles B. Simmons Granting Rules to Show Cause and Motion Seeking Contempt for Non-Compliance against Dora S. Morrow, filed October 6, 2014
- (25) Deutsche Bank's Motion to Reconsider October 6, 2014 Order, dated October 16, 2014
- (26) Order of the Honorable Charles B. Simmons Granting in Part and Denying In Part Plaintiff's Motion to Reconsider October 6, 2014 Order, filed November 12, 2014

I certify that this designation contains no matter which is irrelevant to this appeal.



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David R. Price, Jr. (S.C. Bar # 75140)  
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Attorney for the Appellants

Greenville, South Carolina  
Date: February 23, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
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Charles B. Simmons, Jr., Master-in-Equity Judge

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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,

Respondent,

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,

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

Appellants,

v.

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

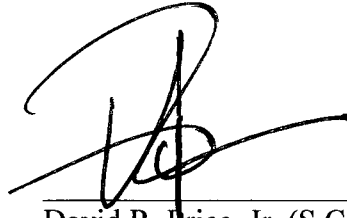
Respondent.

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**CERTIFICATE OF COUNSEL**

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In accordance with Rule 210(c), SCACR, the undersigned certifies that the Designation of Matter to be included in the Record on Appeal contains no matter which is irrelevant to the Appeal.



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David R. Price, Jr. (S.C. Bar # 75140)  
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Greenville, South Carolina  
Date: February 23, 2015



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

ATTORNEY AT LAW

February 23, 2015

**RECEIVED**  
FEB 26 2015  
**SC Court of Appeals**

Tanya A. Gee, Clerk  
**South Carolina Court of Appeals**  
Post Office Box 11629  
Columbia, South Carolina 29211

**RE: Deutsche Bank v. Dora S. Morrow, et. al.**  
**Appellate Case No.: 2014-002381**

Dear Ms. Gee:

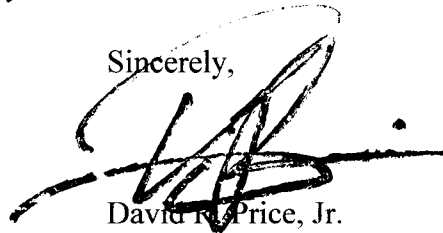
Enclosed you will find an original and two (2) copies of the *Initial Brief of Appellants, Designation of Matter to be Included in the Record on Appeal and the Proof of Service* in connection with the above referenced appeal.

I would ask that you please file the original and return the clocked copies to me in the envelope provided for same.

By copy of this letter to Respondent's Counsel, Thomas Elihue Dudley, III, Matthew Tillman and Daniel Q. Orvin, I am serving them a copy of same.

Thank you for your assistance. Please feel free to contact my office with any questions or concerns you may have.

Sincerely,



David R. Price, Jr.

DRP/mla  
Enclosures

cc: Thomas Elihue Dudley, III, Esq.  
Matthew Tillman, Esq.  
Daniel Quigley Orvin, Esq.

South Carolina Court Administration  
1015 Sumter Street, Suite 200  
Columbia, South Carolina 29201