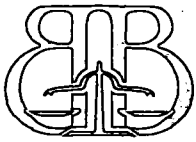


5



BABB & BROWN, P.C.
ATTORNEYS AT LAW

ATTORNEYS
EVERETTE H. BABB
J. CHRIS BROWN*
H. STEWART JAMES
*ALSO LICENCED IN GEORGIA

June 19, 2015

VIA FACSIMILE AND UPS OVERNIGHT
RETURN RECEIPT REQUESTED
Fax No. 803-734-1839

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

RECEIVED

JUN 22 2015

SC Court of Appeals

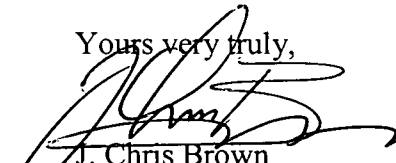
RE: Townes at Pelham v. Donna Boyd
Appellate Case No. 2014-000701

Dear Ms. Kitchings:

My client, Townes at Pelham Owner's Association, Inc., will not be filing an initial brief or any other responsive pleadings in this appeal other than the attached Designation of Matter to be Included in the Record on Appeal. After thoughtful and deliberate consideration, my client does not have the necessary funds to proceed with filing an initial brief. My client has spent several years and a significant amount of the Association's funds attempting to hold the Appellant accountable for her actions. However, my client can no longer justify these expenses or the cost of legal representation.

As stated in previous pleadings filed with this Appeal, my client vigorously pursued the legal remedies awarded it at trial in the Greenville County Court of Common Pleas and respectfully requests the Court of Appeals affirm the trial court's decision based on the overwhelming evidence presented at trial that led to a favorable verdict for my client.

Yours very truly,



J. Chris Brown
Attorney at Law

JCB:ah

Enclosures

cc: Donna Boyd

5

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUN 22 2015

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

Charles B. Simmons, Jr., Circuit Court Judge

Case No. 2014-CP-00-0701

Townes at Pelham Owners'
Association, Inc.,

Respondent,

v.

Donna Boyd

Appellant.


DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal:

1. All matters of public record in the Greenville County Register of Deeds office, including all Restrictive Covenants, Deeds, Plats, and Notices of Lien relevant to this matter.
2. All matters of public record in the Greenville County Clerk of Court's office, including all judgments relevant to this matter.
3. All pleadings filed in Case Number 2012-CP-23-3686 in the Greenville County Court of Common Pleas.
4. All Plaintiff's Trial Exhibits.

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

June 19, 2015



J. Chris Brown
Attorney for Respondent, Townes at
Pelham Owners' Association, Inc.
505 W. Butler Road
Greenville, SC 29607

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUN 22 2015

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

Charles B. Simmons, Jr., Circuit Court Judge

Case No. 2014-000701

Townes at Pelham Owners'
Association, Inc.

Respondent,

v.

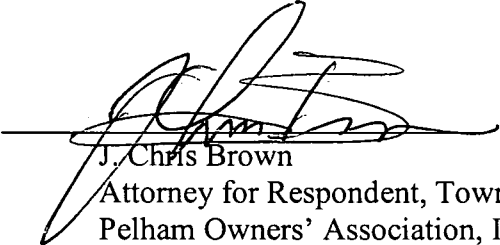
Donna Boyd

Appellant

PROOF OF SERVICE

I certify that I have served the Designation of Matter to be Included in the Record on Appeal by facsimile to 803-734-1839 and overnight delivery to the South Carolina Court of Appeals at 1015 Sumter Street, Columbia, SC, 29201 and by depositing a copy of it in the United States Mail, postage prepaid on Friday, June 19, 2015, addressed to the Appellant, Donna Boyd, at Post Office Box 1168, Mauldin, South Carolina, 29662.

June 19, 2015


J. Chris Brown


Attorney for Respondent, Townes at
Pelham Owners' Association, Inc.
505 W. Butler Road
Greenville, SC 29607

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed label at the solid line below. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
 UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.
 Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
 Hand the package to any UPS driver in your area.
 Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

FOLD HERE

<p>ANN HUTSELL 864-422-0022 MAULDIN OFFICE 505 W BUTLER RD GREENVILLE SC 29607</p> <p>1.0 LBS LTR 1 OF 1</p> <p>RECEIVED</p> <p>JUN 22 2015</p> <p>SHIP TO: JENNY ABBOTT KITCHINGS 803-734-1839 SOUTH CAROLINA COURT OF APPEALS 1015 SUMTER STREET COLUMBIA SC 29201-8726</p>	<p>SC 2922 9-01</p> 	<p>UPS EARLY A.M.</p> <p>TRACKING #: 1Z 698 WE2 A0 9640 4278</p> <p>1+</p>		<p>BILLING: P/P ADULT SIGNATURE REQUIRED-MIN 21</p> <p>File #: Townes at Pelham - Boyd</p>  <p>CS 17.2.07. WNTNVS0 63.04 04/2015</p>
---	---	---	--	--