

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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**APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
R. Markley Dennis  
Circuit Court Judge**

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**Case No. 2014-CP-10-4946**

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**Wells Fargo Bank, N.A., as Successor by Merger  
to Wachovia Bank, National Association as  
Successor by Merger to First Union National Bank..... Plaintiff/Respondent,**

**v.**

**Penny Creek Associates, L.L.C. a/k/a Penny  
Creek Associates, LLC; The Grove at Fenwick  
Plantation, LLC; Charlotte R. Zurlo; Eugene J.  
Zurlo; Charlotte R. Zurlo and Eugene J. Zurlo,  
as Co-Trustees of The Nicklaus Lane Realty  
Trust No. 1 under Declaration of Trust dated  
May 22, 1998; Fenwick Hall Plantation Property  
Owners Ass'n., Inc. a/k/a Fenwick Hall Plantation  
Property Owners' Association, Inc.; Preserve at  
Fenwick Hall Property Owners' Association, Inc.;  
and The Grove at Fenwick Plantation  
Condominium Association, Inc..... Defendants/Respondents,**

**Michel F. LaPlante a/k/a Michel  
Laplante a/k/a Mitch Laplante ..... Defendant/Third-Party Plaintiff/Appellant,**

**v.**

**The Eugene J. Zurlo Living Trust,  
Dated December 11, 1997 and Paul Zurlo.... Third-Party Defendants/Respondents.**

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**PROOF OF SERVICE**

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I certify that I have served the Notice of Appeal on the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on July 2, 2015, addressed to the Respondents' respective attorneys of record at the addresses designated in Exhibit A.

Dated: 07/08/2015



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## Exhibit A

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**Attorney for Defendants/Respondents Eugene J. Zurlo; Charlotte R. Zurlo and Eugene J. Zurlo, as Co-Trustees of The Nicklaus Realty Trust No. 1 under Declaration of Trust dated May 22, 1998**  
**and**  
**Attorney for Third-Party Defendant/Respondent The Eugene J. Zurlo Living Trust, Dated December 11, 1997**

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**Attorneys for Third-Party Defendant/Respondent Paul Zurlo**

The Honorable Julie J. Armstrong  
 Charleston County Clerk of Court  
 100 Broad Street, Suite 106  
 Charleston, South Carolina 29401-2258  
**Charleston County Clerk of Court**

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FACSIMILE MEMORANDUM

TO: South Carolina Court of Appeals, Clerk of Court

FAX NO.: 803-734-1839

DATE: July 8, 2015

FROM: Attorney Jason Luck/elm

RE: Wells Fargo v. Penny Creek Associates, LLC

COA Tracking No.: 2015-001461

Case No.: 2014-CP-10-4946

Our File No.: 6338-3

Note: Attached please find the Third-Party Summons and Proof of Service from Attorney Luck regarding the above referenced matter.

There are 6 pages including this one to be faxed. If there is an error in transmission, please contact our office at (843) 722-6777.

Thank you.

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