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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHESTER COUNTY
Court of Common Pleas

AUG 12 2015

SC Court of Appeals

G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2014-CP-12-00272
Appellate Case No. 2015-001015

TD Bank, N.A., Successor by
merger with
Carolina First Bank,

Respondent,

v.

Joseph L. Huckabee, Jr., a/k/a
Joseph Laverne Huckabee,

Appellant.

MOTION TO CONSOLIDATE APPEALS

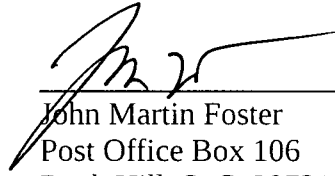
Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellant, by his counsel herein, moves this Court for an order to consolidate appeals, on the grounds stated below:

1. The legal issues in this appeal and that designated as TD BANK, N.A., Respondent, v. JOSEPH L. HUCKABEE et al., Appellants, Appellate Case No. 2015-001018 are similar, if not identical, as is the Respondent in both cases and some of the Appellants, all of which Appellants consent to this Motion to Consolidate.

The basis of this Motion is the within-cited Rule, the records of this appeal, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellant herein moves this Court to consolidate the appeals referenced above.

August 10, 2015



John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
803 324-8100
Attorney for Appellant

Other Counsel of Record:

John T. Moore
Brandon Keith Poston
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 110070
Columbia, S. C. 29211
Attorneys for Respondent
(803) 255-9518

Matthew J. Modica
U.S. Attorney's Office
151 Meeting Street, Suite 200
Charleston, S. C. 29401
Attorney for United States: IRS
(843) 266-1600

THE STATE OF SOUTH CAROLINA
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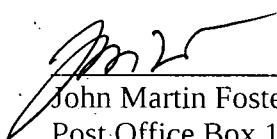
PROOF OF SERVICE

I certify that I have served the Appellant's Motion to Consolidate Appeals dated August 10, 2015, on the following counsel or persons of record:

John T. Moore	Matthew J. Modica
Brandon Keith Poston	U.S. Attorney's Office
Nelson Mullins Riley & Scarborough, LLP	151 Meeting Street, Suite 200
Post Office Box 110070	Charleston, S. C. 29401
Columbia, S. C. 29211	

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262(b), S.C.A.C.R.

August 10, 2015



John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
803 324-8100
Attorney for Appellant

5

JOHN MARTIN FOSTER

Attorney at law

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223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfoster@comporium.net

August 10, 2015

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

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AUG 12 2015

SC Court of Appeals

Re: TD Bank, N.A., Successor by merger with Carolina First Bank, Respondent
v. Joseph L. Huckabee, a/k/a Joseph Laverne Huckabee, Jr., et al., Appellants
Case No.: 2014-CP-46-01638
Appeallate Case No. 2015-001018

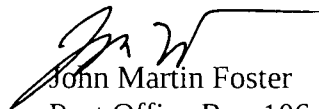
Dear Ms. Kitchings:

In accordance with Rules 240 and 263(a), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellant's Motion to Consolidate Appeals, together with Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$25.00.

By copy of this letter, I am serving the attorney for the Respondent with copies of the said Motion, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

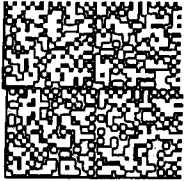
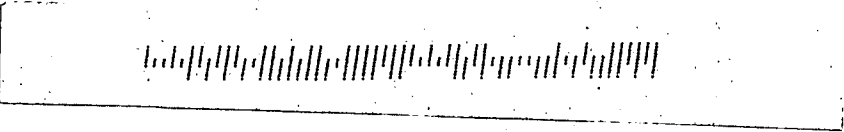
Sincerely,




John Martin Foster
Post Office Box 106
Rock Hill, South Carolina 29731
803 324-8100
Attorney for Appellant

jmf/
enclosures

cc: John T. Moore	Matthew J. Modica
Brandon Keith Poston	U.S. Attorney's Office
Nelson Mullins Riley & Scarborough, LLP	151 Meeting Street, Suite 200
Post Office Box 110070	Charleston, S. C. 29401
Columbia, S. C. 29211	Attorney for United States: IRS
Attorneys for Respondent	(843) 266-1600
(803) 255-9518	



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 SC Court of Appeals

John Martin Foster Attorney
 223 East Main St Suite 520
 Post Office Box 106
 Rock Hill SC 29731-6106

TO: THE HONORABLE JENNY ABBOTT KITCHINGS
 CLERK OF THE COURT OF APPEALS
 POST OFFICE BOX 11629
 COLUMBIA, S.C. 29211