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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY

Gordon G. Cooper, Master-in-Equity, Seventh Judicial Circuit

Appellate Case No. 2015-001269

Blackwell Property Rentals, LLC,

Plaintiff,

v.

Robert J. Keys, Sr., US Bank  
National Association, Howard R.  
Burns, Jr., Herman Dodds, Jr.,  
Vanessa Twitty, Rosa L. Dodd,  
Janice L. Dodd, Brenda G. Dodd,  
John Doe and Jane Doe,

Defendants,

---

US Bank National Association,

Appellant,

v.

County of Spartanburg, South Carolina,

Respondent.

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MOTION TO DISMISS APPEAL

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Appellant US Bank National Association ("US Bank"), by and through its undersigned  
counsel, hereby moves to dismiss this appeal.

US Bank National Association  
v. County of Spartanburg, South Carolina  
Case No. 2015-001269  
MOTION TO DISMISS APPEAL

September 1, 2015

Respectfully submitted,

  
Sean A. O'Connor (SC Bar No. 68382)  
FINKEL LAW FIRM LLC  
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*Attorney for Appellant  
US Bank National Association*

Respondents' counsel:

John H. Harris, Esq.  
Senior Deputy County Attorney  
Spartanburg County Attorney's Office  
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*Attorney for Respondent, County of Spartanburg,  
South Carolina*

Scott F. Talley, Esq.  
Talley Law Firm, P.A.  
2500 Winchester Place | Suite 100  
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T: 864.595.2966  
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*Attorney for Plaintiff, Blackwell Property  
Rentals, LLC*

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APPEAL FROM SPARTANBURG COUNTY

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Janice L. Dodd, Brenda G. Dodd,  
John Doe and Jane Doe,

Defendants,

---

US Bank National Association,

Appellant,

v.

County of Spartanburg, South Carolina,

Respondent.

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PROOF OF SERVICE

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I hereby certify that, on the 1st day of September, 2015, a copy of the *Motion to Dismiss Appeal* was served upon the following individual(s) by mailing a copy of the same with sufficient first class

Blackwell Property Rentals, LLC v. Robert J. Keys, Sr.

PROOF OF SERVICE

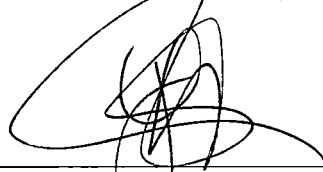
Appellate Case No.: 2015-001269

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postage affixed thereto and addressed as follows:

Scott F. Talley, Esq.  
Talley Law Firm, P.A.  
2500 Winchester Place, Suite 100  
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*Attorney for Plaintiff,  
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*Attorney for Third-Party Defendant,  
County of Spartanburg, South Carolina*



---

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# FINKEL LAW FIRM LLC

JENNIFER L. ELLIS, PARALEGAL  
JELLIS@FINKELLLAW.COM

September 1, 2015

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

REPLY TO:  
CHARLESTON LITIGATION  
**RECEIVED**

SEP 09 2015  
SC Court of Appeals

**Re: Blackwell Property Rentals, LLC v. Robert J. Keys, Sr., US Bank National Association, Howard R. Burns, Jr., Herman Dodd, Jr., Vanessa Twitty, Rosa L. Dodd, Janice L. Dodd, Brenda G. Dodd, John Doe and Jane Doe and U.S. Bank National Association v. County of Spartanburg, South Carolina**  
**Appellate Case No.: 2015-001269**  
**Our File No.: 52310.48618**

Dear Ms. Kitchings:

Enclosed please find a *Motion to Dismiss Appeal* and the related *Proof of Service* which needs to be filed on connection with the above referenced matter. We respectfully request that you file-stamped same and return to our office in the enclosed envelope.

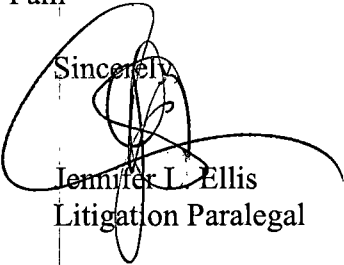
I have enclosed check number 5778 in the amount of \$25.00 for the filing fee.

By copy of this letter, I am providing same to all interested parties.

If you have any questions or concerns, please contact me at your convenience.

With kind personal regards, I am

Sincerely,

  
Jennifer L. Ellis  
Litigation Paralegal

:jle  
Enclosure

cc: Scott F. Talley, Esq. (w/encl.)  
John H. Harris, Esq. (w/encl.)

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jle

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



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SC Court of Appeals