

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

OCT 14 2015

SC Court of Appeals

Alison Renee Lee, Circuit Court Judge

---

Case No. 2011-CP-40-6103  
Appellate Case No. 2013-002403

---

Bank of New York Mellon Trust Company, National  
Association f/k/a The Bank of New York Trust  
Company, N.A. as successor to JP Morgan Chase Bank  
N.A. s/b/m Bank One National Association as Trustee for  
RAMP 2002RS5, Plaintiff,

v.

Chartrease Grier, Palmetto Health Alliance; and Palmetto  
Richland Memorial, Defendants,

Chartrease Grier, Third-Party Plaintiff, . . . . . Appellant,

v.

Nationwide Property & Casualty Insurance Company;  
and Tonya D. Parks, Third-Party Defendants, . . . . . Respondents.

---

**NOTICE OF APPEARANCE**

---

Michael J. Anzelmo, Esquire, of the law firm of Nelson Mullins Riley &  
Scarborough, LLP, enters his appearance as additional counsel of record for  
Respondents Nationwide Property & Casualty Insurance Company and Tonya D. Parks

in the above-captioned appeal. The undersigned asks that he be included on all future correspondence in this action.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Michael J. Anzelmo

SC Bar No. 72933

E-Mail: michael.anzelmo@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, South Carolina 29201

(803) 799-2000

*Attorneys for Respondents Nationwide Property &  
Casualty Insurance Company and Tonya D. Park*

October 14, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

---

Case No. 2011-CP-40-6103  
Appellate Case No. 2013002403

---

**RECEIVED**  
OCT 14 2015  
SC Court of Appeals

Bank of New York Mellon Trust Company, National  
Association f/k/a The Bank of New York Trust  
Company, N.A. as successor to JP Morgan Chase Bank  
N.A. s/b/m Bank One National Association as Trustee for  
RAMP 2002RS5, Plaintiff,

v.

Chartrease Grier, Palmetto Health Alliance; and Palmetto  
Richland Memorial, Defendants,

Chartrease Grier, Third-Party Plaintiff, . . . . . Appellant,

v.

Nationwide Property & Casualty Insurance Company;  
and Tonya D. Parks, Third-Party Defendants, . . . . . Respondents.

---

**PROOF OF SERVICE**

---

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

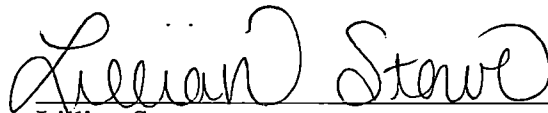
Pleadings: **NOTICE OF APPEARANCE**

Counsel Served:

M. Alison Moon, Esquire  
Sarah E. Brown, Esquire  
Moon Law Firm  
P.O. Box 3785  
Greenville, SC 29608

Michael Geoffrey Wimer, Esquire  
Wimer & Associates, P.C. d/b/a Asheville Law Group  
349 Haywood Road  
Asheville, NC 28806

Scott J. Bradley, Esquire  
The Joel Bieber Firm  
201 E. North Street  
Greenville, SC 29601

A handwritten signature in cursive script that reads "Lillian Stowe". The signature is written in black ink and is positioned above a horizontal line.

Lillian Stowe  
Administrative Assistant

October 14, 2015

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP  
Attorneys and Counselors at Law  
1320 Main Street / 17th Floor / Columbia, SC 29201  
Tel: 803.799.2000 Fax: 803.255.9024  
www.nelsonmullins.com

Michael J. Anzelmo  
Tel: 803.255.9312  
Fax: 803.255.9024  
michael.anzelmo@nelsonmullins.com

October 14, 2015

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**

OCT 14 2015

SC Court of Appeals

RE: Bank of New York Mellon Trust Company, National Association f/k/a The Bank of New York Trust Company, N.A. as successor to JP Morgan Chase Bank N.A. s/b/m Bank One National Association as Trustee for RAMP 2002RS5, Plaintiff, v. Chartrease Grier, Palmetto Health Alliance; and Palmetto Richland Memorial, Defendants

Chartrease Grier, Appellant v. Nationwide Property & Casualty Insurance Company; and Tonya D. Parks, Respondents

Appellate Case No. 2013-002403  
Our File No. 18813/01510

Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of Respondents' Notice of Appearance. Please file the original and return a clocked-in copy to me via our courier. Should you have any questions, please do not hesitate to contact me.

By copy of same, we are hereby serving all counsel of record.

Very truly yours;



Michael J. Anzelmo

MJA:dh8

cc: M. Allison Moon, Esquire  
Scott J. Bradley, Esquire  
Michael Geoffrey Wimer, Esquire