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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DILLON COUNTY  
Court of Common Pleas

Harry R. Easterling, Jr., Special Referee

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NOV 23 2015

SC Court of Appeals

Case No. 2012-CP-17-0060  
Court of Appeals No. 2015-000985

Bank of America, N.A. successor by merger to BAC Home Loans Servicing, LP  
f/k/a Countrywide Home Loans Servicing, LP..... Respondent.

v.

Shawn L. Bethea; South Carolina Department of Motor Vehicles, Defendants,  
Of whom Shawn L. Bethea is the.....Appellant.

**SECOND MOTION TO COMPEL APPELLANT TO CORRECT  
RECORD ON APPEAL AND FOR EXTENSION OF TIME  
TO FILE FINAL BRIEF AND MEMORANDUM IN SUPPORT**

Trent M. Grissom  
S.C. Bar No. 77718  
MCGUIREWOODS LLP  
201 North Tryon Street  
Suite 3000  
Charlotte, NC 28202  
Tel: (704) 343-2000  
Fax: (704) 444-8738

*Attorney for Respondent*

Date: November 20, 2015

Pursuant to Rules 210(c) and 263(b) of the South Carolina Appellate Court Rules, Respondent Bank of America, N.A. successor by merger to BAC Home Loans Servicing, LP f/k/a Countrywide Home Loan Servicing, LP (Respondent) respectfully requests that the Court issue an order compelling Appellant Shawn L. Bethea (Appellant) to correct the numbering in his record on appeal "consecutively beginning with the index" as required by Rule 210(c) and to include all the documents listed on the parties' respective designations of matters to be included in the record on appeal and in the Appellant's index. At this time, the record on appeal filed by Appellant does not comply with the requirements of Rule 210(c) because the record is not numbered consecutively beginning with the index. Specifically, the first six pages are numbered out of sequence and the document entitled "Manufactured Housing Affidavit is not included in the Appellant's record. Without compliance with Rule 210(c), Appellant and Respondent cannot comply with Rule 211(b)'s reference to record requirement. To this end, there is good cause to grant this motion and to extend Respondent's deadline to file a final brief to 20 days after Appellant's service and filing of an amended record on appeal that complies with Rule 210(c).

WHEREFORE, for good cause shown, Respondent prays that the Court issue an order compelling Appellant to serve and file an amended record on appeal that complies with the numbering requirements of Rule 210(c) and provides Respondent with an extension of time to file a final brief within 20 days of Appellant's service and filing of an amended record on appeal.

*Trent M. Grissom* by *A. Harney*  
Trent M. Grissom *Brian A. Colby*  
S.C. Bar No. 77718 *as author-fee*  
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*Attorney for Respondent* NOV 23 2015

**SC Court of Appeals**

**CERTIFICATE OF SERVICE**

The undersigned certifies that this designation of matter for record on appeal was served on Appellant by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

Shawn L. Bethea  
1317 Gordonville Court  
Dillon, SC 29536

This the 20th day of November, 2015.

*Trent M. Grissom by Attorney*  
Trent M. Grissom

*Brian A. Coleb  
is authorized*

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November 20, 2015

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SC Court of Appeals

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

**Re: Bank of America, N.A. v. Shawn L. Bethea, et al.**  
**Case No. 2015-000985**

Dear Ms. Kitchings:

Enclosed please find an original and one (7) copies of Respondent's Second Motion to Compel Appellant to Correct Record on Appeal and Extension of Time to File Final Brief and Memorandum in Support, along with a check in the amount of \$25.00, regarding the above-referenced matter.

Upon receipt, kindly file the original and return the conformed copy to my attention in the postage-paid envelope provided for your convenience.

Please feel free to contact me should you have any questions. Thank you for your assistance.

Sincerely,

MCGUIRE WOODS LLP

  
Muriel Powell  
Paralegal

/MP  
Enclosures  
c: Shawn L. Bethea, Pro Se (w/encl.)

ORIGIN ID: QWGA (704) 343-2000  
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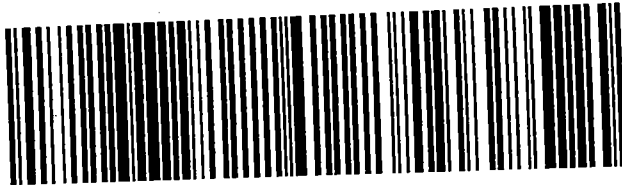
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