

77816

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2014-CP-46-01638

RECEIVED

NOV 09 2015

SC Court of Appeals

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

Respondent,

v.

Joseph L. Huckabee, Jr., a/k/a  
Joseph Laverne Huckabee,  
Pat Huckabee,  
The Huckabee, LLC, and  
The United States of America,  
by and through its agency,  
The Internal Revenue Service,

of whom:

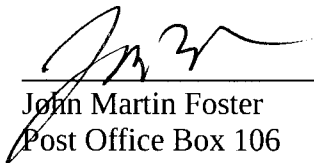
Joseph L. Huckabee, Jr., a/k/a  
Joseph Laverne Huckabee,  
Pat Huckabee, and  
The Huckabee, LLC are the

Appellants.

NOTICE OF APPEAL

Joseph L. Huckabee, Jr., a/k/a Joseph Laverne Huckabee, Pat Huckabee, and The Huckabee, LLC appeal the order of the Honorable S. Jackson Kimball dated October 2, 2015. Appellant received written notice of entry of this order on October 6, 2015.

November 5, 2015

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

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  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2014-CP-46-01638

**RECEIVED**  
NOV 09 2015  
SC Court of Appeals

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

Respondent,

v.

Joseph L. Huckabee, Jr., a/k/a  
Joseph Laverne Huckabee,  
Pat Huckabee,  
The Huckabee, LLC, and  
The United States of America,  
by and through its agency,  
The Internal Revenue Service,

of whom:

Joseph L. Huckabee, Jr., a/k/a  
Joseph Laverne Huckabee,  
Pat Huckabee, and  
The Huckabee, LLC are the

Appellants.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal dated November 5, 2015 on the following  
counsel or persons of record:

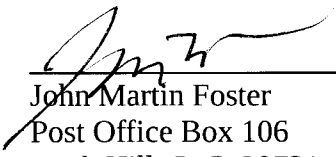
John T. Moore  
Brandon Keith Poston  
Nelson Mullins Riley & Scarborough, LLP  
Post Office Box 110070  
Columbia, S. C. 29211

Matthew J. Modica  
U.S. Attorney's Office  
151 Meeting Street, Suite 200  
Charleston, S. C. 29401

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.

November 5, 2015



---

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

JOHN MARTIN FOSTER

*Attorney at law*

The Guardian Building PO Box 106 803 324 8100  
223 East Main Street Suite 520 Rock Hill SC 803 324 8109 Fax  
Rock Hill South Carolina 29730 29731-6106 jmfooster@comporium.net

RECEIVED

NOV 09 2015

SC Court of Appeals

November 5, 2015

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

Re: TD Bank, N.A., Successor by merger with Carolina First Bank, Respondent  
v. Joseph L. Huckabee, a/k/a Joseph Laverne Huckabee, Jr.,  
Pat Huckabee and The Huckabee, LLC, Appellants.  
Case No.: 2014-CP-46-01638

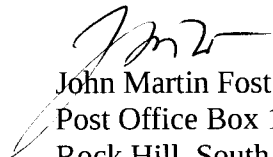
Dear Ms. Kitchings:

Enclosed for filing is the original and a copy of our notice of appeal in the above case.  
Also enclosed are the following:

- (1) Proof of service of the notice of appeal on all respondents.
- (2) Two copies of the order which is to be challenged on appeal.
- (3) Our filing fee of \$100.00.

Please return the conformed copies to us in the enclosed self-addressed stamped envelope.

Sincerely,

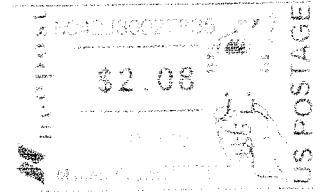
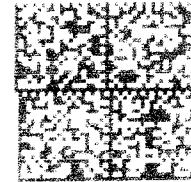
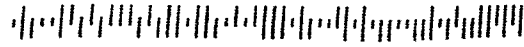


John Martin Foster  
Post Office Box 106  
Rock Hill, South Carolina 29731  
803 324-8100  
Attorney for Appellants

jmf/  
enclosures

cc: 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



**RECEIVED**

NOV 09 2015

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