

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson, Jr.,  
Circuit Court Judge

Case No. 2013-CP-10-2624

Appellate Case No. 2015-001149

RECEIVED

DEC 16 2015

SC Court of Appeals

PNC Bank, N.A., successor to RBC Bank (USA),.....

Respondent,

Liberty Cottages, LLC; GW Derchester, LLC; USS  
Clarksville, LLC; Liberty Cottages Land, LLC; ROA,  
LLC; Royal Beach Properties, LLC; The Brothers of SC,  
LLC; Deborah Rice-Marko a/k/a Deborah G. Rice-Marko;  
Evan R. Marko; and John E. Marko, Jr., .....

Appellants.

FINAL BRIEF OF RESPONDENT

PNC BANK, NATIONAL ASSOCIATION, SUCCESSOR TO RBC BANK (USA)

Frank B. B. Knowlton  
Thomas William McGee, III  
A. Mattison Bogan  
Tara C. Sullivan  
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*Attorneys for Respondent*

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PNC Bank, N.A., successor to RBC Bank (USA),..... Respondent,

v.  
Liberty Cottages, LLC; GW Dorchester, LLC; USS  
Clarksville, LLC; Liberty Cottages Land, LLC; ROA,  
LLC; Royal Beach Properties, LLC; The Brothers of SC,  
LLC; Deborah Rice-Marko a/k/a Deborah G. Rice-Marko;  
Evan R. Marko; and John E. Marko, Jr., ..... Appellants..

**FINAL BRIEF OF RESPONDENT**

**PNC BANK, NATIONAL ASSOCIATION, SUCCESSOR TO RBC BANK (USA)**

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*Attorneys for Respondent*





1/13/16  
17104/1517 (S)  
Notated

## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

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January 12, 2016

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1320 Main Street  
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Re: PNC Bank v. Liberty Cottages  
Appellate Case No. 2015-001149

Dear Counsel:

Upon reviewing your final brief of respondent, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The caption/title does not comply with Rule 267(a), SCACR. Specifically, the orders challenged on appeal do not have ROA, LLC listed as a defendant. The caption should read as follows:

PNC Bank, N.A., successor to RBC Bank (USA), Respondent,

v.

Liberty Cottages, LLC; GW Dorchester, LLC; USS Clarksville, LLC;  
Liberty Cottages Land, LLC; Royal Beach Properties, LLC; The Brothers of  
SC, LLC; Deborah Rice-Marko a/k/a Deborah G. Rice-Marko; Evan R.  
Marko and John E. Marko, Jr., Appellants.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Robert E. Stepp, Esquire  
Willard D. Hanna, Jr., Esquire  
William Hammond Jordan, Esquire  
Benjamin Rogers Gooding, Esquire  
A. Mattison Bogan, Esquire

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January 19, 2016

RECEIVED

JAN 19 2016

SC Court of Appeals

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

RE: PNC Bank, N.A., successor to RBC Bank (USA) v. Liberty Cottages, LLC,  
et. al.  
Appellate Case No. 2015-001149  
Our File No. 17104/01517

Dear Ms. Kitchings:

Pursuant to the Court's letter dated January 12, 2016, enclosed are labels with the corrected caption. By copy of this letter to counsel of record, we are providing them with labels to apply to the Final Brief of Respondent.

Very truly yours,



A. Mattison Bogan

AMB:lpw  
Enclosures

cc: Robert E. Stepp, Esquire  
Willard D. Hanna, Jr., Esquire  
William H. Jordan, Esquire  
Benjamin R. Gooding, Esquire