

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 11 2016  
SC Court of Appeals

APPEAL FROM JASPER COUNTY

Darrell Thomas Johnson, Jr., Special Referee

Appellate Case No. 2015-002049  
Civil Action No. 2013-CP-27-00253

Bank of Walterboro,.....Plaintiff/Respondent,

v.

Charles E. Bush aka Charles Bush, Rosemelle M. Shuler, First  
Family Financial Services of Georgia, Inc., EquiFirst Corporation,  
Mortgage Electronic Registration Systems, Inc. as nominee for BNC  
Mortgage Inc., and South Carolina Department of Revenue,.....Defendants,

of whom Mortgage Electronic Registration Systems, Inc. is the Appellant,

and

Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

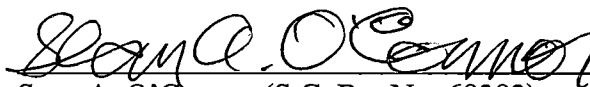
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Appellant proposes the following to be included in the Record on Appeal:

1. Summons and Complaint filed May 13, 2013, including exhibits;
2. Notice of Hearing with Finality filed May 6, 2015;
3. Special Referee's Decree for Final Judgment of Foreclosure filed May 21, 2015;
4. Defendant MERS' Motion to Vacate and Set Aside Final Judgment of Foreclosure and Sale filed July 13, 2015;
5. Defendant MERS' Memorandum in Support of Motion to Vacate and Set Aside Final Judgment of Foreclosure and Sale filed July 20, 2015;
6. Plaintiff Bank of Walterboro's Memorandum of Law and Argument of Counsel in Opposition to Rule 60 Motion filed July 23, 2015;
7. Affidavit of James M. Bunton, Jr. dated July 21, 2015;
8. Affidavit of Linda C. Jordan dated July 21, 2015;
9. Transcript of Hearing on Rule 60 Motion held on July 23, 2015;
10. Order Denying Motion to Reopen Judgment filed August 25, 2015;
11. Notice of Appeal filed September 29, 2015.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



Sean A. O'Connor (S.C. Bar No. 68382)

FINKEL LAW FIRM, LLC

4000 Faber Place Drive, Suite 450

North Charleston, South Carolina 29405

(843) 577-5460

[soconnor@finkellaw.com](mailto:soconnor@finkellaw.com)

*Attorney for Appellant Mortgage Electronic  
Registration Systems, Inc. as nominee for  
BNC Mortgage Inc.*

February 8, 2016

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Mortgage Inc., and South Carolina Department of Revenue,.....Defendants,

of whom Mortgage Electronic Registration Services, Inc. is the Appellant,

and

Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

PROOF OF SERVICE

I hereby certify that on this, the 8th day of February, 2016, a copy of both the *Initial Brief of Appellants* and *Designation of Matter to be Included in the Record on Appeal* were served upon the following individual(s) by mailing a copy of the same with sufficient first class postage affixed thereto and addressed as follows:

Bank of Walterboro v. Charles Bush, et al.

PROOF OF SERVICE

Appellate Case No.: 2015-002049

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The Honorable Darrell Thomas Johnson, Jr.  
Special Referee, County of Jasper  
Law Office of Darrell Thomas Johnson, Jr., LLC  
Post Office Box 1125  
Hardeeville, South Carolina 29927

George W. Cone, Esq.  
McLeod Fraser & Cone LLC  
Post Office Box 230  
Walterboro, South Carolina 29488  
*Attorney for Plaintiff*

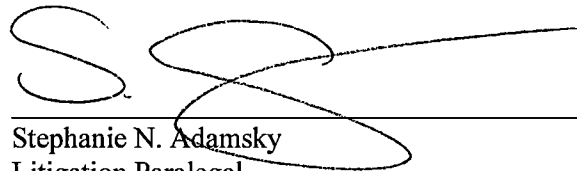
Charles E. Bush  
380 Church Street  
Hardeeville, South Carolina 29927  
*Defendant, Pro se*

Milton G. Kimpson, Esq.  
Office of Gen. Counsel for Tax and Reg. Services  
SC Department of Revenue  
Post Office Box 12265  
Columbia, South Carolina 29211

Equifirst Corporation  
c/o CT Corporation System, Registered Agent  
150 Fayetteville Street, Box 1011  
Raleigh, North Carolina 27601  
*Defendant*

R. Thayer Rivers, Jr., Esq.  
Attorney at Law  
Post Office Box 668  
Ridgeland, South Carolina 29936  
*Attorney for Defendant Rosemelle M. Shuler*

First Family Financial Services, Inc., successor  
by merger to First Family Services of Georgia,  
c/o CT Corporation System, Registered Agent  
2 Office Park Court  
Columbia, South Carolina 29223  
*Defendant*



Stephanie N. Adamsky  
Litigation Paralegal  
Finkel Law Firm LLC  
4000 Faber Place Drive, Suite 450  
North Charleston, South Carolina 29405  
T: 843.577.5460  
F: 866.800.7954

# FINKEL LAW FIRM LLC

STEPHANIE N. ADAMSKY, PARALEGAL  
SADAMSKY@FINKELLLAW.COM

REPLY TO:  
CHARLESTON LITIGATION

February 8, 2016

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

FEB 11 2016

SC Court of Appeals

**Re: Bank of Walterboro v. Charles E. Bush aka Charles Bush, Rosemelle M. Shuler, First Family Financial services of Georgia, Inc., EquiFirst Corporation, Mortgage Electronic Registration Systems, Inc., as nominee for BNC Mortgage, Inc., and SC Department of Revenue Appellate Case No. 2015-002049  
Case No.: 2013-CP-27-00253  
Our File No.: 52310.49481**

Dear Ms. Kitchings:

Enclosed please find the *Initial Brief of Appellants, Designation of Matter to be Included in the Record on Appeal* and the related *Proof of Service* which we have prepared in connection with the above referenced appeal. It would be greatly appreciated if you would please file same and return the file-stamped copies in the enclosed envelope.

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

With warmest regards, I am

Yours very truly,



Stephanie N. Adamsky  
Litigation Paralegal

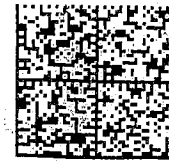
/sna

cc: The Honorable Darrell Thomas Johnson, Jr.  
George W. Cone, Esq.  
R. Thayer Rivers, Jr., Esq.  
Charles E. Bush, *Pro Se*  
First Family Financial Services, Inc.  
EquiFirst Corporation  
Milton G. Kimpson, Esq.

**COLUMBIA**  
1201 Main Street, Suite 1800  
Post Office Box 1799 (29202)  
Columbia, SC 29201  
Tel: (803) 765-2935  
Fax: (803) 252-0786

**CHARLESTON**  
Litigation, Real Estate & REO  
4000 Faber Place Drive, Suite 450  
Post Office Box 41489 (29423)  
North Charleston, SC 29405  
Tel: (843) 577-5460  
Fax: (843) 577-5135

**CHARLESTON**  
Foreclosure  
4000 Faber Place Drive, Suite 450  
Post Office Box 71727 (29415)  
North Charleston, SC 29405  
Tel: (843) 577-5460  
Fax: (843) 725-0015



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4000 Faber Place Drive  
Suite 450  
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