

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY

Ellis B. Drew, Jr., Master-in-Equity

Appellate Case No. 2015-001416

**RECEIVED**

FEB 16 2016

**SC Court of Appeals**

Deutsche Bank National Trust Company as  
Indenture Trustee for MortgageIT Trust 2004-1,

Respondent,

v.

Joseph F. DeBoskey; and Suntrust Bank,

Defendants,

Of whom Joseph F. DeBoskey is the Appellant,

Appellant.

**RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

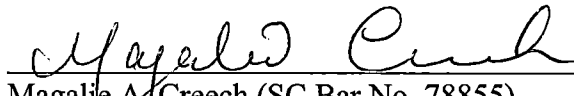
Respondent proposes the following to be included in the Record on Appeal:

1. Lis Pendens, Summons, Complaint, and Notice of Foreclosure Intervention in Civil Action No. 2011-CP-04-3316, filed November 10, 2011;
2. Reinstatement Quote, dated December 27, 2011;
3. Denial of Foreclosure Relief, filed January 20, 2012;
4. Motion for More Definite Statement, filed February 17, 2012;
5. Certification of Compliance with S.C. Supreme Court Administrative Order 2011-05-02-01, filed February 21, 2012;
6. Return to Motion for More Definite Statement, filed March 15, 2012;
7. Order of Reference, Affidavit of Default, and Affidavit of Non-Military Status filed on June 11, 2012;

8. Order denying Motion for More Definite Statement, filed August 13, 2012;
9. Notice of Appearance of Bridget D. Swing, filed September 12, 2012;
10. Judgment and Order of Foreclosure and Sale, filed September 17, 2012;
11. Reinstatement Quote, dated October 9, 2012;
12. Reinstatement Quote, dated November 16, 2012;
13. Order staying December 4, 2012 foreclosure sale, filed December 3, 2012;
14. Order Relieving Bridget D. Swing as counsel for Appellant, filed December 6, 2012;
15. Reinstatement Quote, dated December 20, 2012;
16. Reinstatement Quote, dated June 27, 2013;
17. Motion for Relief from Judgment, filed October 23, 2013;
18. Return to Motion for Relief from Judgment, filed November 15, 2013;
19. Reinstatement Quote, dated January 7, 2014;
20. Reinstatement Quote, dated June 23, 2014;
21. Reinstatement Quote, dated January 22, 2015;
22. Transcript of hearing on Motion for Relief from Judgment held May 12, 2015;
23. Order Denying Motion for Relief from Judgment, filed June 3, 2015;
24. Notice of Appeal, filed June 30, 2015;
25. Motion for Recusal, filed August 16, 2015;
26. Master's Order Denying Continuance, filed October 14, 2015; and
27. Court of Appeals Order Denying Continuance, filed October 27, 2015.

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

Respectfully submitted,



Magalie A. Creech (SC Bar No. 78855)  
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*Attorney for Respondent*

February 11, 2016

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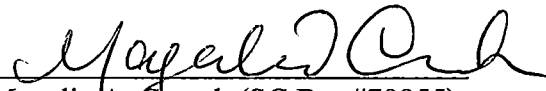
Defendants,

Of whom Joseph F. DeBoskey is the,

Appellant.

PROOF OF SERVICE

I certify that I have served the *Respondent's Initial Brief and Designation of Matter* by depositing a copy of same in the United States Mail, postage prepaid, on February 11, 2016, addressed to Appellant of record, Joseph F. DeBoskey, 115 Caribou Cove, Anderson, South Carolina 29621.

  
Magalie A. Creech (SC Bar #78855)  
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*Attorney for Respondent*

February 11, 2016



MAGALIE A. CREECH  
MCREECH@FINKELLLAW.COM

REPLY TO:  
CHARLESTON LITIGATION

February 11, 2016

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

RE: Deutsche Bank v. Joseph DeBoskey  
Appellate Case No.: 2015-001416  
Our File No.: 56430. 47496

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing is the *Respondent's Initial Brief and Designation of Matter* and related *Proof of Service* in the above-referenced case, along with six (6) copies, which we kindly ask you to file and return in the attached, self-addressed, stamped envelope.

Should you have any questions concerning this matter, please do not hesitate to contact our office at your earliest convenience.

With kind personal regards, we are

Yours very truly,

FINKEL LAW FIRM

Magalie A. Creech

CC: Joseph DeBoskey

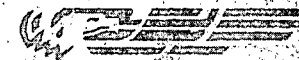
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