

78760

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

Appellate Case No. 2015-002258

RECEIVED

FEB 23 2016

SC Court of Appeals

The Bank of New York Mellon Trust Company, N.A.,
not in its individual capacity but solely as trustee on behalf of
the FDIC 2013-N1 Asset Trust,

Respondent,

v.

Sandra H. Dennis and Discover Bank,

Defendants,

Of whom Sandra H. Dennis is the,

Appellant.

RESPONDENT'S MOTION TO DISMISS APPEAL AS UNTIMELY

Respectfully submitted,

FINKEL LAW FIRM LLC

Magalie A. Creech (S.C. Bar 78855)
Post Office Box 41489
Charleston, South Carolina 29423
Telephone: (843) 577-5460
Facsimile: (866) 800-7954
mcreech@finkellaw.com
Attorneys for Respondent

February 18, 2016

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MEMORANDUM

Undersigned counsel for Respondent The Bank of New York Mellon Trust Company, N.A., not in its individual capacity but solely as trustee on behalf of the FDIC 2013-N1 Asset Trust, hereby submits the instant Memorandum of Law in Support of its Motion to Dismiss the appeal filed by Appellant Sandra H. Dennis pursuant to Rule 240 of the South Carolina Appellate Court Rules (SCACR). The Appellant's failure to timely serve her notice of appeal pursuant to Rule 203(b), SCACR, renders her appeal untimely and divests this Court of jurisdiction. Accordingly, an immediate dismissal of the appeal is required.

I. PROCEDURAL POSTURE

Respondent commenced a foreclosure action against Defendant by the filing of a Lis Pendens, Summons, Complaint, and Notice of Foreclosure Intervention on March 21, 2014. Defendant timely returned an executed Foreclosure Intervention response form pursuant to the 2011-05-02-01 Administrative Order of the Supreme Court, requesting a loan modification or forbearance agreement. Defendant then served an Answer and Counterclaim on May 21, 2014, to which Plaintiff replied on June 15, 2014. In the interim, Plaintiff served Defendant a Denial of Foreclosure Relief on June 9, 2014 based on her failure to return the required foreclosure intervention application, and a Certification of Compliance with the 2011-05-02-01 Administrative Order was filed on June 11, 2014.

Defendant subsequently served an Amended Answer and Counterclaim on June 20, 2014, to which Plaintiff replied on July 18, 2014. Defendant's Answer raised counterclaims for misrepresentation, intentional infliction of emotional distress, fraud in the inducement, violation of the South Carolina Unfair Trade Practices Act, violations of the South Carolina Consumer

Protection Code at S.C. Code §37-5-108 and §37-5-203, violation of the Real Estate Settlement Procedures Act, and negligence, in addition to unclean hands and rescission as defenses.

After the parties engaged in discovery, Respondent filed a Motion for Summary Judgment as to liability on the foreclosure action, and on all Defendant's counterclaims. A hearing was held on July 27, 2015, at which counsel for both Appellant and Respondent appeared. The trial court took the Motion for Summary Judgment under advisement.

On July 28, 2015, the trial judge advised counsel for Appellant and Respondent via email that the Motion for Summary Judgment was granted. (See Exhibit A). The trial judge requested counsel for Respondent to prepare a corresponding order, which counsel for Respondent subsequently submitted via email on August 4, 2015. Between August 5, 2015 and August 19, 2015, Appellant's counsel made a number of objections to the proposed order via email. On August 19, 2015, Respondent's counsel sent a revised order to the trial judge and Appellant's counsel, and stated that Respondent could not consent to the remaining changes requested by Appellant. (See Exhibit B). Thereafter, on August 25, 2015, the trial judge advised counsel for Appellant and Respondent via email that the revised order had been signed and mailed to Respondent's counsel. (See Exhibit C).

Respondent's counsel sent the executed order for filing on August 31, 2015, which was subsequently entered on September 3, 2015. Notice of Entry of Judgment was mailed to all appearing parties by the clerk of court on September 4, 2015. (See Exhibit D). The case was then referred to the Master in Equity on September 10, 2015. In email correspondence with the office of the Master in Equity, Appellant's counsel stated that he had received the Notice of Entry of Judgment on September 10, 2015. (Exhibit E, page 3).

Appellant did not file a motion under Rule 59, SCRPC or any other post trial motion. Instead, Appellant served a notice of appeal, *pro se*, on October 20, 2015. While Appellant's attorney filed a motion to be relieved as her counsel in the lower court on October 15, 2015, that motion has not been ruled upon as of the date of the instant Motion.

II. ARGUMENT

Rule 203(b), SCACR requires that a party serve his or her notice of appeal within thirty days after receiving written notice of the entry of a final order or judgment. Rule 203(b), SCACR. Failure to do so divests this Court of subject matter jurisdiction and requires dismissal of the appeal. *See Canal Ins. Co. v. Caldwell*, 338 S.C. 1, 5-6, 524 S.E.2d 416, 418 (Ct. App. 1999) (*citing First Carolina Nat'l Bank v. A & S Enters., Inc.*, 272 S.C. 339, 251 S.E.2d 762 (1979); *Burnett v. S.C. State Highway Dep't*, 252 S.C. 568, 167 S.E.2d 571 (1969)). The Supreme Court of South Carolina has previously stated that “[s]ervice of the notice of appeal is a jurisdictional requirement, and [the] Court has no authority to extend or expand the time in which the notice of intent to appeal must be served.” *Camp v. Camp*, 386 S.C. 571, 574-575, 689 S.E.2d 634, 636 (2010) (internal quotations omitted); *Elam v. S.C. DOT*, 361 S.C. 9, 602 S.E.2d 772 (2004) (if a party misses the deadline, the appellate court lacks jurisdiction to consider the appeal and has no authority or discretion to extend or ignore the deadline for service of the notice.)

Recently, this Court held that email notification from a trial judge of the execution of an order constitutes receipt of written notice pursuant to Rule 203(b)(1), SCACR. *See Wells Fargo Bank, N.A. v. Fallon Properties S.C., LLC*, 413 S.C. 642, 776 S.E.2d 575 (Ct. App. 2015). In *Fallon*, this Court found that an email from the office of the master in equity with the order on

appeal as an attachment constitutes written notice of entry of the order under Rule 203(b)(1), SCACR.

The order of judgment which Appellant is appealing was executed on August 25, 2015, and Appellant's attorney was notified of the foregoing via email on that same day. While the email itself did not contain a copy of the executed order as an attachment as it did in *Fallon*, the email clearly stated that the revised order as submitted by Respondent's counsel had been signed and mailed for filing. It is incontrovertible that Appellant's attorney received the revised order submitted previously by Respondent's counsel on August 19, 2015.

Under the holding in *Fallon*, the email from the office of the trial judge is written notice pursuant to Rule 203(b)(1), SCACR and, accordingly, the Appellant's deadline to serve the notice of appeal fell on September 24, 2015. Appellant served her notice of appeal on October 20, 2015. Because Appellant failed to timely serve the notice of appeal within thirty days after receipt of written notice, this Court lacks appellate jurisdiction and is required to dismiss the appeal.

Notwithstanding the trial judge's email notice to the parties, counsel for Appellant confirmed that he received the mailed Notice of Entry of Judgment on September 10, 2015. In general, notice to an attorney is notice to his client. See *American Freehold Land Mortg. Co. v. Felder*, 44 S.C. 478, 22 S.E. 598 (1895); *Woodrow v. Frederick*, 133 S.C. 431, 131 S.E. 598 (1926); *Crystal Ice Co. of Columbia, Inc. v. First Colonial Corp.*, 273 S.C. 306, 257 S.E.2d 496 (1979); accord, *Hillman v. Pinion*, 347 S.C. 253, 257, 554 S.E.2d 427, 429 (Ct. App. 2001) ("The acts of an attorney are directly attributable and binding on his client.").

Appellant was represented by counsel on September 10, 2015, which is the date Appellant's attorney acknowledged having received the written Notice of Entry of Judgment

mailed to the parties by the clerk of court. It is irrelevant that he subsequently moved to be relieved Appellant's counsel. It is similarly immaterial that Appellant's notice of appeal states she received the written Notice of Entry of Judgment on September 21, 2015.

It is the black letter law of this State that Appellant was imputed with the notice to her attorney. As a result, Appellant was imputed with knowledge of her counsel's receipt of the Notice of Entry of Judgment on September 10, 2015, and the deadline to file a notice of appeal fell on October 12, 2015 (this being the next day after Saturday, October 10, 2015, which was neither a Saturday, Sunday, nor State or Federal holiday pursuant to Rule 6(a), SCRCF). The notice of appeal served by Appellant on October 20, 2015 is therefore untimely, and this Court lacks jurisdiction to consider the appeal.

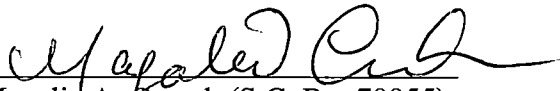
III. CONCLUSION

Appellant received notice from the trial court by email on April 25, 2015 that the order she is appealing was executed and mailed for filing. Under the holding of *Fallon*, Appellant's appeal is untimely because it was not served within thirty days of April 25, 2015. Alternatively, Appellant's counsel acknowledged that he received the written Notice of Entry of Judgment sent by mail from the clerk of court on September 10, 2015. Appellant's failure to serve the notice of appeal within thirty days of September 10, 2015 renders the appeal untimely. Under both analyses, this Court lacks appellate jurisdiction to consider the appeal and is therefore required to dismiss it.

(SIGNATURE PAGE FOLLOWS)

Respectfully submitted,

FINKEL LAW FIRM LLC



Magalie A. Creech (S.C. Bar 78855)

Post Office Box 41489

Charleston, South Carolina 29423

Telephone: (843) 577-5460

Facsimile: (866) 800-7954

mcreech@finkellaw.com

Attorneys for Respondent

February 18, 2016

Magalie Creech

From: Couch, Roger L. Law Clerk (John Connell Jr.) <rcouchlc@sccourts.org>
Sent: Tuesday, July 28, 2015 3:03 PM
To: Magalie Creech; Couch, Roger L.
Cc: 'Charles Ailstock'; Dominique Biggers
Subject: RE: BONY Mellon Trust Company, NA as Trustee v. Sandra Dennis (2014-CP-10-01905)

Ms. Creech,

Judge Couch is granting the Plaintiff's Protective Order and Summary Judgment motion. Please prepare an Order in this fashion. Submit a copy to opposing counsel and then to Judge Couch's chambers. Thank you.

Kind regards,

John

From: Magalie Creech [<mailto:mcreech@finkellaw.com>]
Sent: Friday, July 17, 2015 4:53 PM
To: Couch, Roger L.; Couch, Roger L. Law Clerk (John Connell Jr.)
Cc: 'Charles Ailstock'; Dominique Biggers
Subject: BONY Mellon Trust Company, NA as Trustee v. Sandra Dennis (2014-CP-10-01905)

Good afternoon, Judge Couch:

I represent the Plaintiff in the above-referenced foreclosure action, which is scheduled for several hearings before you on July 27, 2015 at 2:30. Attached is the *Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment*. The original is being sent for filing today.

Please do not hesitate to let us know if you require any additional materials for review of these matters.

Kind regards,

Magalie A. Creech, Esquire
Finkel Law Firm LLC
P.O. Box 41489
Charleston, SC 29423
Tel: (843) 577-5460
Fax: (843) 577-5135
Direct: (843) 576-6311
mcreech@finkellaw.com

* If you cannot reach me and require immediate assistance, please contact Dominique Biggers at dbiggers@finkellaw.com. If you cannot reach me and require immediate assistance from an attorney, please contact Andy Shook at ashook@finkellaw.com.

 Please consider your environmental responsibility before printing this e-mail. Stay Green.

NOTICE REQUIRED BY FEDERAL FAIR DEBT COLLECTION PRACTICES ACT: This firm collects debts for mortgage lenders and other creditors, and any information obtained will be used for that purpose. However, If you have previously received a discharge in bankruptcy, this message is not and should not be construed as an attempt to collect a debt but only as an attempt to enforce a lien.



Magalie Creech

From: Magalie Creech
Sent: Wednesday, August 19, 2015 11:37 AM
To: 'Couch, Roger L. Law Clerk (Adam Mandell)'; 'Charles Ailstock' (cailstock@gmail.com); Dominique Biggers
Subject: RE: BONY Mellon Trust Company, NA as Trustee v. Sandra Dennis (2014-CP-10-01905)
Attachments: 10Y5959-Proposed Order Granting MSJ_Revised.PDF; 10Y1562-Proposed Order Granting Motion for Protection.PDF

Good morning, Mr. Mandell:

I have reviewed the Defendant's objections to the order, and am unable consent to the proposed changes. I think it best we leave it in the Judge's discretion to determine which findings are appropriate as relate to the grant of summary judgment. I have added a provision stating that the Defendant's Motion to Dismiss was not before the Court and therefore the Court makes no finding as to same. Copies of the revised order granting summary judgment and order granting motion for protection are attached.

Please do not hesitate to let me know if you would like for me to send them in word format as well.

Kind regards,

Magalie A. Creech, Esquire
Finkel Law Firm LLC
P.O. Box 41489
Charleston, SC 29423
Tel: (843) 577-5460
Direct: (843) 576-6311
Fax: (866) 800-7948
mcreech@finkellaw.com

** If you cannot reach me and require immediate assistance, please contact Dominique Biggers at dbiggers@finkellaw.com. If you cannot reach me and require immediate assistance from an attorney, please contact Andy Shook at ashook@finkellaw.com.*

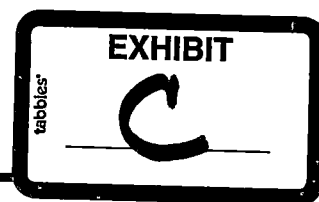
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From: Couch, Roger L. Law Clerk (Adam Mandell) [<mailto:rcouchlc@sccourts.org>]
Sent: Wednesday, August 19, 2015 11:06 AM
To: 'Charles Ailstock' (cailstock@gmail.com); Magalie Creech; Dominique Biggers
Subject: FW: BONY Mellon Trust Company, NA as Trustee v. Sandra Dennis (2014-CP-10-01905)

Please find Defendant's objections to the proposed order attached to this message.

Adam J. Mandell
Law Clerk to the Honorable Roger L. Couch



Magalie Creech

From: Couch, Roger L. Law Clerk (Adam Mandell) <rcouchlc@sccourts.org>
Sent: Tuesday, August 25, 2015 9:06 AM
To: Magalie Creech; 'Charles Ailstock' (cailstock@gmail.com); Dominique Biggers
Subject: RE: BONY Mellon Trust Company, NA as Trustee v. Sandra Dennis (2014-CP-10-01905)

Good morning,

I apologize for being out of touch last week as I was out of chambers with Judge Couch attending a conference. Despite our absence, Judge Couch has decided to sign and issue the Plaintiff's revised order. The order has been signed and mailed to Ms. Creech. The disposition of the Order Granting Plaintiff's Motion for Summary Judgment and the Order Granting Plaintiff's Motion for Protection concern only the matters raised before Judge Couch by the motions argued in Charleston on July 27, 2015. To reiterate a point made previously, Judge Couch has not retained the jurisdiction to rule on any matters outside of the July 27 hearing, and any motions with regard to such issues should be raised in the County of Charleston.

Thank you for your cooperation and patience,

Adam J. Mandell
Law Clerk to the Honorable Roger L. Couch
Seventh Judicial Circuit
180 Magnolia Street
Spartanburg, SC 29306
Office: (864) 596-2285
Fax: (864) 562-4234

From: Magalie Creech [mailto:mcreech@finkellaw.com]
Sent: Wednesday, August 19, 2015 11:37 AM
To: Couch, Roger L. Law Clerk (Adam Mandell); 'Charles Ailstock' (cailstock@gmail.com); Dominique Biggers
Subject: RE: BONY Mellon Trust Company, NA as Trustee v. Sandra Dennis (2014-CP-10-01905)

Good morning, Mr. Mandell:

I have reviewed the Defendant's objections to the order, and am unable consent to the proposed changes. I think it best we leave it in the Judge's discretion to determine which findings are appropriate as relate to the grant of summary judgment. I have added a provision stating that the Defendant's Motion to Dismiss was not before the Court and therefore the Court makes no finding as to same. Copies of the revised order granting summary judgment and order granting motion for protection are attached.

Please do not hesitate to let me know if you would like for me to send them in word format as well.

Kind regards,

Magalie A. Creech, Esquire
Finkel Law Firm LLC
P.O. Box 41489
Charleston, SC 29423
Tel: (843) 577-5460

JULIE J. ARMSTRONG
CLERK OF COURT, C.P. & G.S.
100 BROAD STREET, SUITE 106
CHARLESTON, SC 29401-2258
RETURN SERVICE REQUESTED



clerkofcourt.c



Magalie Arcure Creech
PO Box 41489
Charleston, SC 29423

NOTICE OF ENTRY OF JUDGMENT/ORDER PURSUANT TO RULE 77 SCRPC

Order/granting sum judg to plntff & dismissing defnt's

CASE NO: 2014CP1001905

**Bank of New York Mellon Trust Company N A The as Trustee , plaintiff, et al VS Sandra H
Dennis , d**

This judgment was entered on the 03th day of September, 2015, and notice mailed first class on Friday, September 04, 2015, to all counsel of record and/or all parties entitled to receive notice.

You may view and download this document at <http://clerkofcourt.charlestoncounty.org> or obtain a copy in person at the Clerk of Court's Office during regular Charleston County business hours.



Magalie Creech

From: Laura Dukes Beck <LBeck@charlestoncounty.org>
Sent: Thursday, September 17, 2015 10:28 AM
To: Magalie Creech
Subject: FW: Bank of New York Mellon Trust Co. v. Dennis (2014CP1001905)
Attachments: Diamond Jewelers of Spartanburg, Inc. v. Naegele Outdoor Advertising Co.....docx

As I just realized opposing counsel has dropped you from the email I am forwarding it to you. The case above is what he sent us and refers to below.

Neither Ryan nor I will decide which Judge hears the motions. The Judges will need to do so.

The hearing is currently scheduled for November 9th at 11:30. If this needs to be changed, let me know.

Laura Dukes Beck, Esq.
Scheduling and Roster Clerk
Charleston County Master-In-Equity's Office
100 Broad Street, Suite 266
Charleston, SC 29401
Tel: (843) 958-5075
Fax: (843) 958-5077
lbeck@charlestoncounty.org

From: Laura Dukes Beck
Sent: Thursday, September 17, 2015 10:22 AM
To: 'Charles Ailstock'; Ryan W. Conner
Subject: RE: Bank of New York Mellon Trust Co. v. Dennis (2014CP1001905)

We are unable to give legal advice. Arguments are for the Judge(s) to decide. Ryan or I will convey your case law to the Judge when it supports a filed motion. You may wish to review your advance sheets, which discuss Wells Fargo Bank v Fallon Properties South Carolina, LLC et al, recently released by the SC Court of Appeals, 2015-08-26-01, as this case has been cited in our courtroom recently.

Either way, the Plaintiff consents to Judge Scarborough hearing the case, it is up to you to consent or Judge Couch to decide whether Judge Scarborough does so.

Thank you,
Laura

Laura Dukes Beck, Esq.
Scheduling and Roster Clerk
Charleston County Master-In-Equity's Office
100 Broad Street, Suite 266
Charleston, SC 29401
Tel: (843) 958-5075
Fax: (843) 958-5077
lbeck@charlestoncounty.org

From: Charles Ailstock [<mailto:cailstock@gmail.com>]
Sent: Wednesday, September 16, 2015 9:22 PM
To: Laura Dukes Beck; Ryan W. Conner
Subject: Re: Bank of New York Mellon Trust Co. v. Dennis (2014CP1001905)

Sorry, wrong attachment. This is the case.

On Wed, Sep 16, 2015 at 9:11 PM, Charles Ailstock <cailstock@gmail.com> wrote:
Laura, FYI I have attached a decision holding that the 10 days runs from counsel's receipt of the Clerk's Notice.

Thanks

On Wed, Sep 16, 2015 at 4:41 PM, Charles Ailstock <cailstock@gmail.com> wrote:
I understand,

Thanks

On Wed, Sep 16, 2015 at 4:38 PM, Laura Dukes Beck <LBeck@charlestoncounty.org> wrote:

I can't answer your question or advise either way, we are only saying that if the Motion complies with the Rule it can either be heard by consent by Judge Scarborough, or Judge Couch can hear it.

Laura Dukes Beck, Esq.

Scheduling and Roster Clerk

Charleston County Master-In-Equity's Office

100 Broad Street, Suite 266

Charleston, SC 29401

Tel: [\(843\) 958-5075](tel:(843)958-5075)

Fax: [\(843\) 958-5077](tel:(843)958-5077)

lbeck@charlestoncounty.org

From: Charles Ailstock [<mailto:cailstock@gmail.com>]
Sent: Wednesday, September 16, 2015 4:13 PM
To: Laura Dukes Beck
Subject: Re: Bank of New York Mellon Trust Co. v. Dennis (2014CP1001905)

Laura, I received Notice of Entry of Judgement on 9/10/2015 from the Clerk of Court (copy attached). Defendant has 10 days from receipt of the Notice of Entry. I believe the time to file will expire on 9/21/2015? Do you agree?

On Wed, Sep 16, 2015 at 3:43 PM, Laura Dukes Beck <LBeck@charlestoncounty.org> wrote:

The law clerk Ryan Conner and I have been reviewing Rule 59 in order to answer this question. Rule 59(e) states that there are 10 days from receipt of written notice of the entry of the Order in which to file a Motion to Alter or Amend. The certificate of service of the order was dated August 31. The Order was officially clocked on Sept 3. Before you file your post-trial motions make sure that they comply with whichever Rule you are citing to do so.

The Order for Summary Judgment from Judge Couch also refers this case to the Master in Equity as part of it. There is also another Order of Reference filed later.

Depending on whether the post-trial motions are timely, by consent of all parties Judge Scarborough can hear them under Rule 59(f). This rule also provides that Judge Couch retains jurisdiction for hearing post-trial motions. So ultimately, if everyone consents they come here, if the Rules of Procedure have been correctly followed. If there is not consent, and Judge Couch agrees to hear them, the Rule allows for this as well.

Thank you,

Laura

Laura Dukes Beck, Esq.

Scheduling and Roster Clerk

Charleston County Master-In-Equity's Office

100 Broad Street, Suite 266

Charleston, SC 29401

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Fax: [\(843\) 958-5077](tel:(843)958-5077)

lbeck@charlestoncounty.org

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

Appellate Case No. 2015-002258

RECEIVED

FEB 23 2016

SC Court of Appeals

The Bank of New York Mellon Trust Company, N.A.,
not in its individual capacity but solely as trustee on behalf of
the FDIC 2013-N1 Asset Trust,

Respondent,

v.

Sandra H. Dennis; and Discover Bank,

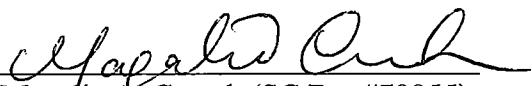
Defendants,

Of whom Sandra H. Dennis is the,

Appellant.

PROOF OF SERVICE

I certify that I have served the *Respondent's Motion to Dismiss Appellant's Appeal as Untimely* by depositing a copy of same in the United States Mail, postage prepaid, on February 25, 2016, addressed to Appellant of record, Sandra H. Dennis, 49 Tradd Street, Charleston, South Carolina 29401, and to Appellant's counsel of record, Charles Ailstock, Sr., Esquire, 12 Wentworth Street, South Carolina 29401.


Magalie A. Creech (SC Bar #78855)
FINKEL LAW FIRM LLC
Post Office Box 41489
Charleston, South Carolina 29423
Telephone: (843) 577-5460
Facsimile: (866) 800-7954
mcreech@finkellaw.com
Attorney for Respondent

February 18, 2016



MAGALIE A. CREECH
MCREECH@FINKELLLAW.COM

REPLY TO:
CHARLESTON LITIGATION

February 18, 2016

RECEIVED

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

FEB 23 2016

SC Court of Appeals

RE: The Bank of New York Mellon Trust Company v. Sandra H. Dennis
Appellate Case No.: 2015-002258
Our File No.: 52140.48271

Dear Ms. Kitchings:

Enclosed for filing is the *Respondent's Motion to Dismiss Appellant's Appeal as Untimely* 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. Enclosed also is check number 60095 in the amount of \$25.00 for the filing fee.

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

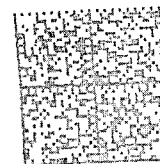
Magalie A. Creech

CC: Sandra H. Dennis
Charles Ailstock, Sr., Esquire

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

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North Charleston, SC 29405
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Fax: (843) 577-5135

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Foreclosure
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Post Office Box 71727 (29415)
North Charleston, SC 29405
Tel: (843) 577-5460
Fax: (843) 725-0015



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FEB 23 2016

SC Court of Appeals

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

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Charleston, SC 29423

DFB/MAC