

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

FEB 22 2016  
SC Court of Appeals

The Honorable Marvin H. Dukes, III  
Beaufort County  
Trial Court Case No. 2011-CP-07-128 and 2011-CP-07-129

Case No. 2015-002156

First Citizens Bank and Trust Company, Inc.,

Respondent/Appellant,

v.

Blue Ox, LLC and J. Chris Lindgren,

Defendants,

Of whom J. Chris Lindgren is the

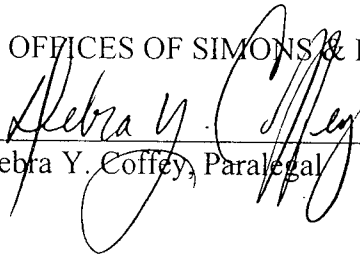
Appellant/Respondent.

PROOF OF SERVICE

I, Debra Y. Coffey, a paralegal with the Law Offices of Simons & Dean, do hereby certify that I have served counsel in this action with a copy of the foregoing Initial Respondent's Brief of Appellant/Respondent upon the below named by mailing a copy of same via U.S. Mail, postage prepaid, and properly addressed as follows:

Joey Randell Floyd, Esquire  
P.O. Box 61110  
Columbia, SC 29260

This 18th day of February, 2016.

LAW OFFICES OF SIMONS & DEAN  
BY:   
Debra Y. Coffey, Paralegal