

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM DILLON COUNTY
Court of Common Pleas

FEB 17 2016
SC Court of Appeals

Harry R. Easterling, Jr., Special Referee

Case No. 2012-CP-17-0060
Court of Appeals No. 2015-000985

Bank of America, N.A. successor by merger to BAC Home Loans Servicing, LP f/k/a
Countrywide Home Loans Servicing, LP..... Respondent.

v.

Shawn L. Bethea; South Carolina Department of Motor Vehicles, Defendants,
Of whom Shawn L. Bethea is the.....Appellant.

RESPONDENT'S RESPONSE TO APPELLANT'S MOTION TO CLOSE APPEAL

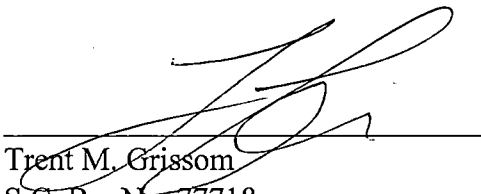
Trent M. Grissom
S.C. Bar No. 77718
MCGUIREWOODS LLP
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Tel: (704) 343-2000
Fax: (704) 444-8738

Attorney for Respondent

Date: February 16, 2016

Pursuant to this Court's request by letter dated February 10, 2016, Respondent, Bank of America, N.A. ("BANA") hereby responds to the Appellant's Motion to Close the Appeal. Although Appellant correctly states that the real property at issue in the lower court action and this Appeal has been transferred to Fannie Mae, Appellant incorrectly concludes that BANA has no further interest in this Appeal. Appellant has appealed the Master in Equity's issuance of a judgment of foreclosure in favor of BANA. Because appellant's appeal attacks the validity of that judgment, BANA has a vested interest in defending the validity of its judgment in this pending Appeal. The law firm of McGuireWoods, LLP continues to represent BANA's interest in this matter.

WHEREFORE, for the reasons stated above, Respondent prays that the Court issue an order DENYING Appellant's Motion to Close the Appeal.



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CERTIFICATE OF SERVICE

The undersigned certifies that this designation of matter for record on appeal was served on Appellant by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

Shawn L. Bethea
1317 Gordonville Court
Dillon, SC 29536

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This the 16th day of February, 2016.



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February 16, 2016

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VIA FEDERAL EXPRESS

Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

**RE: Bank of America v. Shawn L. Bethea, et al.
Appellate Case No. 2015-000985**

Dear Clerk:

Pursuant to the Court's letter dated February 10, 2016, enclosed for filing is Respondent's Response to Appellant's Motion to Close Appeal in this matter. Please file the Response and return a file-stamped copy to me in the self-addressed, stamped envelope also included.

Thank you for your attention to this matter. If you have any questions, please contact our office.

Sincerely,

McGUIREWOODS LLP



Cindy J. West
Practice Assistant to Trent M. Grissom

/cjw
Enclosures

cc: Shawn L. Bethea (w/encl.)

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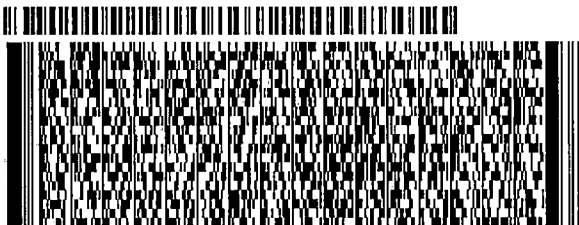
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