



RECEIVED
ATTORNEYS
EVERETTE H. BABB
J. CHRIS BROWN*
H. STEWART JAMES
ALSO LICENCED IN GEORGIA

February 23, 2016

FEB 25 2016
SC Court of Appeals

Ms. Elizabeth Carter
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Townes at Pelham v. Donna Boyd
Appellate Case No. 2014-000701

Dear Ms. Carter:

I have enclosed for your files a copy of additional mortgage foreclosure pleadings pending against Ms. Donna Boyd. If you have any questions, please feel free to contact Mr. Brown at your convenience.

Very truly yours,

Ann Hutsell
Litigation Paralegal

/ah

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

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FEB 25 2016

SC Court of Appeals

CERTIFICATE OF MAILING

(NON-JURY MORTGAGE FORECLOSURE)

C/A NO: 2015-CP-23-07093

DEFICIENCY WAIVED

Lakeview Loan Servicing, LLC ,
PLAINTIFF,

vs.

Donna Boyd; The Townes at Pelham Owners'
Association, Inc.

DEFENDANT(S)

I certify that I Ashtley Stanley have deposited on this date in the US Mail, with proper first class postage attached, a copy of the proposed Order of Publication, Petition for Order of Publication, Summons and Notice of Filing of Complaint and Notice of Foreclosure Intervention to each of the defendants above at the following address(es):

Donna Boyd
6 Pelham Townes Drive
Greenville, SC 29615

The Townes at Pelham Owners Association, Inc.
J. Chris Brown, Esquire
Babb & Brown, P.C.
505 W. Butler Road
Greenville, SC 29607

This the 11 date of February, 2016.
BY: Ashtley Stanley

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR. THE PURPOSE OF THIS COMMUNICATION IS TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE; except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.

Firm Case No: 1171168 (JFCS.CAE)



RECEIVED

FEB 25 2016

SC Court of Appeals

HIGH PERFORMANCE LAW™

Foreclosure Department
Phone: 803-726-2700
Fax: 803-252-6822
HutchensLawFirm.com

Offices In:
Fayetteville, Charlotte, Wilmington, NC |
Columbia, SC

240 Stoneridge Drive
Columbia, SC 29210

P.O. Box 8237
Columbia, SC 29202

February 11, 2016

GREENVILLE CLERK OF COURT
COURTHOUSE
305 E NORTH ST
GREENVILLE, SC 29601-2121

RE: Lakeview Loan Servicing, LLC vs. Donna Boyd; The Townes at Pelham Owners' Association, Inc.
Docket Number: 2015-CP-23-07093
Firm Case Number: 1171168 (JFCS.CAE)

Dear Clerk of Court:

Enclosed is a proposed Order of Publication, Petition for Order of Publication, Summons and Notice of Filing of Complaint and Notice of Foreclosure Intervention, along with the Affidavits of Non-Service and one copy of each in this action. If the proposed Order meets with your approval, please return a filed copy of the Order and corresponding documentation in the enclosed envelope.

Sincerely,

Ashley Z Stanley (handwritten signature)

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FEB 25 2016

SC Court of Appeals

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

Lakeview Loan Servicing, LLC ,
PLAINTIFF,

vs.

Donna Boyd; The Townes at Pelham Owners'
Association, Inc.

DEFENDANT(S)

CERTIFICATE OF MAILING

(NON-JURY MORTGAGE FORECLOSURE)

C/A NO: 2015-CP-23-07093

DEFICIENCY WAIVED

I certify that I Ashley Stanley have deposited on this date in the US Mail, with proper first class postage attached, a copy of the proposed Order of Publication, Petition for Order of Publication, Summons and Notice of Filing of Complaint and Notice of Foreclosure Intervention to each of the defendants above at the following address(es):

Donna Boyd
6 Pelham Townes Drive
Greenville, SC 29615

The Townes at Pelham Owners Association, Inc.
J. Chris Brown, Esquire
Babb & Brown, P.C.
505 W. Butler Road
Greenville, SC 29607

This the 11 date of February, 2016.
BY: Ashley Stanley

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STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

RECEIVED

IN THE COURT OF COMMON PLEAS

FEB 25 2016

Lakeview Loan Servicing, LLC

vs.

Donna Boyd; The Townes at Pelham Owners'
Association, Inc.

DEFENDANT(S)

SC Court of Appeals

ORDER FOR PUBLICATION
(NON-JURY MORTGAGE FORECLOSURE)

C/A NO: 2015-CP-23-07093

DEFICIENCY WAIVED

IT APPEARING to my satisfaction from the Affidavit and the pleadings previously filed herein, that a cause of action exists for the foreclosure of a mortgage on real property located in Greenville County, and that despite due diligence the Defendant(s) Donna Boyd and The Townes at Pelham Owners' Association, Inc., could not be located within the State of South Carolina, and therefore, personal service cannot be effected. Now, therefore, upon motion of the undersigned attorney for the Plaintiff,

IT IS ORDERED that the Summons herein, together with the Notice of Filing of the Complaint in the Office of the Clerk of Court for Greenville County and Notice of Foreclosure Intervention be served upon the Defendant(s) Donna Boyd and The Townes at Pelham Owners' Association, Inc., by publication of the Summons, together with the Notice of Filing of Complaint and Notice of Foreclosure Intervention, once a week for three consecutive weeks in The Greenville News, a newspaper printed and published in the County and State aforesaid; and that, in accordance with statute, a copy of the Notice of Foreclosure Intervention, Lis Pendens, Summons and Complaint be mailed to the Defendant(s) Donna Boyd and The Townes at Pelham Owners' Association, Inc. at his/her/their last known address(es).

Clerk of Court for Greenville County

Greenville, South Carolina

_____, 2016

I SO MOVE:

Ashley Stanley

_____, 2016

John S. Kay S.C. Bar # 7914
John B. Kelchner S.C. Bar #13589
Ashley Z. Stanley S.C. Bar # 74854
Hutchens Law Firm
P.O. Box 8237
Columbia, SC 29202
803-726-2700
Attorneys for Plaintiff

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

Lakeview Loan Servicing, LLC ,
PLAINTIFF,
vs.
Donna Boyd; The Townes at Pelham Owners'
Association, Inc.
DEFENDANT(S)

PETITION FOR ORDER OF PUBLICATION
(NON-JURY MORTGAGE FORECLOSURE)

C/A NO: 2015-CP-23-07093

DEFICIENCY WAIVED

PERSONALLY appeared before me, the undersigned, who being first duly sworn, deposes and says:

1. That he/she is one of the attorneys for the Plaintiff in the above-entitled action.
2. That the Summons and Complaint were filed in the Office of the Clerk of Court on November 30, 2015; that a cause of action exists in favor of the Plaintiff against the Defendant(s) for the foreclosure of a certain mortgage covering property located in Greenville County, as will more fully appear by reference to the Complaint.
3. That the above-named Defendant(s) Donna Boyd may claim some right in the said real estate; that a part of the relief which the Plaintiff demands in this action is to exclude the said Defendant(s), from any interest in the said real estate; and that the Defendant(s) Donna Boyd is/are, therefore, proper party/parties to this action.
4. That after diligent and reasonable search, Donna Boyd could not be found within this State, although his/her/their last address(es) is/are 6 Pelham Townes Drive Greenville, SC 29615, 116 Woodmont Circle, Greenville, SC 29605 and 33 Echols Drive, Greenville, SC 29605.
5. That deponent is informed and believes that under the circumstances, the Court should issue an Order requiring that the Notice of Foreclosure Intervention, Summons and Notice of filing of Complaint in this action be served upon the Defendant(s) Donna Boyd by publication of a copy of the Notice of Foreclosure Intervention, Summons and Notice in this case according to the publication statutes of the State of South Carolina.

BY: Ashley Stanley
2/11, 2016

John S. Kay S.C. Bar # 7914
John B. Kelchner S.C. Bar #13589
Ashley Z. Stanley S.C. Bar # 74854
Hutchens Law Firm
P.O. Box 8237
Columbia, SC 29202
803-726-2700
Attorneys for Plaintiff

Sworn to before me this
11th day of February, 2016

[Signature]
Notary Public for South Carolina
My Commission Expires: 6/24/24

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

Lakeview Loan Servicing, LLC ,
PLAINTIFF,
vs.
Donna Boyd; The Townes at Pelham Owners'
Association, Inc.
DEFENDANT(S)

SUMMONS AND NOTICE OF
FILING OF COMPLAINT AND NOTICE OF
FORECLOSURE INTERVENTION

(NON-JURY MORTGAGE FORECLOSURE)

C/A NO: 2015-CP-23-07093

DEFICIENCY WAIVED

TO THE DEFENDANTS, ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, or otherwise appear and defend, and to serve a copy of your Answer to said Complaint upon the subscriber at his office, Hutchens Law Firm; P.O. Box 8237; Columbia, SC 29202, within thirty (30) days after service hereof, except as to the United States of America, which shall have sixty (60) days, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, or otherwise appear and defend, the Plaintiff in this action will apply to the Court for the relief demanded therein, and judgment by default will be rendered against you for the relief demanded in the Complaint.

YOU WILL ALSO TAKE NOTICE that should you fail to Answer the foregoing Summons, the Plaintiff will move for an Order of Reference of this case to the Master in Equity for Greenville County , which Order shall, pursuant to Rule 53 of the South Carolina Rules of Civil Procedure, specifically provide that the said Master in Equity for Greenville County is authorized and empowered to enter a final judgment in this case with appeal only to the South Carolina Court of Appeals pursuant to Rule 203(d)(1) of the SCAR, effective June 1, 1999.

TO MINOR(S) OVER FOURTEEN YEARS OF AGE, AND/OR TO MINOR(S) UNDER FOURTEEN YEARS OF AGE AND THE PERSON WITH WHOM THE MINOR(S) RESIDES, AND/OR TO PERSONS UNDER SOME LEGAL DISABILITY:

YOU ARE FURTHER SUMMONED AND NOTIFIED to apply for the appointment of a guardian ad litem within thirty (30) days after the service of this Summons and Notice upon you. If you fail to do so, application for such appointment will be made by the Plaintiff immediately and separately and such application will be deemed absolute and total in the absence of your application for such an appointment within thirty (30) days after the service of the Summons and Complaint upon you.

YOU WILL ALSO TAKE NOTICE that should you fail to Answer the foregoing Summons, the Plaintiff will move for an Order of Reference of this case to the Master in Equity for Greenville County in/for this County, which Order shall, pursuant to Rule 53 of the South Carolina Rules of Civil Procedure, specifically provide that the said Master in Equity for Greenville County is authorized and empowered to enter a final judgment in this case with appeal only to the South Carolina Court of Appeals pursuant to Rule 203(d)(1) of the SCAR, effective June 1, 1999.

NOTICE OF FILING OF SUMMONS AND COMPLAINT

TO THE DEFENDANTS ABOVE NAMED:

YOU WILL PLEASE TAKE NOTICE that the foregoing Summons, along with the Complaint, was filed with the Clerk of Court for Greenville County, South Carolina, on November 30, 2015.

NOTICE OF FORECLOSURE INTERVENTION

PLEASE TAKE NOTICE THAT pursuant to the South Carolina Supreme Court Administrative Order 2011-05-02-01, (hereinafter "Order"), you may have a right to Foreclosure Intervention.

To be considered for any available Foreclosure Intervention, you may communicate with and otherwise deal with the Plaintiff through its law firm, Hutchens Law Firm, P.O. Box 8237, Columbia, SC 29202 or call 803-726-2700. Hutchens Law Firm, represents the Plaintiff in this action and does not represent you. Under our ethical rules, we are prohibited from giving you any legal advice.

You must submit any requests for Foreclosure Intervention consideration within 30 days from the date of this Notice. **IF YOU FAIL, REFUSE, OR VOLUNTARILY ELECT NOT TO PARTICIPATE IN FORECLOSURE INTERVENTION, YOUR MORTGAGE COMPANY/AGENT MAY PROCEED WITH A FORECLOSURE ACTION.** If you have already pursued loss mitigation with the Plaintiff, this Notice does not guarantee the availability of loss mitigation options or further review of your qualifications.

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR. THE PURPOSE OF THIS COMMUNICATION IS TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.

BY:

Ashley Stanley

2/11, 2016

John S. Kay S.C. Bar # 7914
John B. Kelchner S.C. Bar #13589
Ashley Z. Stanley S.C. Bar # 74854
Hutchens Law Firm
P.O. Box 8237
Columbia, SC 29202
803-726-2700
Attorneys for Plaintiff

STATE OF SOUTH CAROLINA
COUNTY OF Greenville

IN THE COURT OF COMMON PLEAS

Lakeview Loan Servicing, LLC ,
vs. PLAINTIFF,

Donna Boyd; The Townes at Pelham Owners'
Association, Inc.

DEFENDANT(S)

CERTIFICATE OF SERVICE
(NON-JURY MORTGAGE FORECLOSURE)

C/A NO: 2015-CP-23-07093

DEFICIENCY WAIVED

I certify that I have deposited on this date in the US Mail, VIA CERTIFIED MAIL, a copy of Notice of Foreclosure Intervention, Lis Pendens, Summons and Complaint to each of the defendants above at the following address(es):

Donna Boyd
6 Pelham Townes Drive
Greenville, SC 29615

This the 11 date of February, 2016

BY: Ashley Stanley

Ashley Stanley

Lakeview Loan Servicing, LLC,	PLAINTIFF,
vs.	
Donna Boyd; The Townes at Pelham Owners' Association, Inc.	DEFENDANT(S)

AFFIDAVIT OF DUE DILIGENCE
(NON-JURY MORTGAGE FORECLOSURE)
C/A NO: 2015-CP-23-07093
DEFICIENCY WAIVED

PERSONALLY appeared before me, the undersigned, who being first duly sworn, deposes and says:

1. That he/she is one of the attorneys for the Plaintiff in the above-entitled action.
2. That the Summons and Complaint were filed in the Office of the Clerk of Court on November 30, 2015; that a cause of action exists in favor of the Plaintiff against the Defendants for the foreclosure of a certain mortgage covering property located in Greenville County as will more fully appear by reference to the Complaint.
3. That the Defendant may claim some right in the said real estate; that a part of the relief which the Plaintiff demands in this action is to exclude the Defendant Donna Boyd, (hereinafter "Defendant"), from any interest in the said real estate; and that Defendant is, therefore, a proper party to this action.
4. That a LexisNexis Accurint Search was performed to determine the potential addresses for the Defendant, a copy of which is attached hereto.
5. That Plaintiff attempted to serve Defendant with the Summons, Complaint, and Notice of Foreclosure Intervention at the property located at 6 Pelham Townes Drive Greenville, SC 29615, which is the subject of the foreclosure action. Defendant could not be located at said address.
6. The process server who attempt to serve Defendant at the aforementioned address also searched 116 Woodmont Circle, Greenville, SC 29605 and 33 Echols Drive, Greenville, SC 29605, PO Box 1168, Mauldin, SC 29662, Greenville County, 411.com and Peoplemsart.com websites with no results according to the Affidavit of Non-Service, a copy of which is attached hereto.
7. Therefore, after diligent and reasonable search by Plaintiff, deponent is informed and believes that under the circumstances, the Court should issue an Order requiring that the Notice of Foreclosure Intervention, Summons and Notice of filing of Complaint in this action be served upon Defendant by publication of said pleadings in accordance with the publication statues of the State of South Carolina.

BY: Ashley Stanley
2/11, 2015

John S. Kay
John B. Kelchner
Ashley Z. Stanley

Attorney for Plaintiff
Hutchens Law Firm
P.O. Box 8237
Columbia, SC 29202
803-726-2700

Sworn to before me this
11th day of February, 2015
John A. Boyd

Notary Public for South Carolina
My Commission Expires: 10/28/2019



BABB & BROWN, P.C.

ATTORNEYS AT LAW

505 W. BUTLER RD., GREENVILLE, SC 29607



\$0.705
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FROM 29607
02/23/2016

stamps
.com



05250007302653



Ms Elizabeth Carter
South Carolina Court of Appeals
1015 Sumter Street
Columbia SC 29201-3726

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FEB 25 2016

SC Court of Appeals