

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis, Jr.
Circuit Court Judge

Case No. 2013-CP-10-05329
Appellate Case No. 2016-000028

RECEIVED

MAR 18 2016

SC Court of Appeals

JPMorgan Chase Bank, National Association, Appellant,

v.

Delilah Starr Acheson a/k/a Delilah S. Acheson a/k/a
Starr D. Acheson, individually, as Legal Heir and
Personal Representative of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,
Jacob Lee Acheson, and Daniel Alexander Acheson, as
Legal Heirs or devisees of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Ronald Lee Dowell, Ruth C. Dowell, and Charleston
County Revenue Collections, Defendants.

Of whom Delilah Starr Acheson a/k/a Delilah S.
Acheson a/k/a Starr D. Acheson, individually, as Legal
Heir and Personal Representative of the Estate of
Joseph L. Acheson a/k/a Joseph Lynn Acheson, Sr.,
Deceased, Amber Mae Acheson Reed, Joseph Lynn
Acheson, Jr., Jacob Lee Acheson, and Daniel
Alexander Acheson, as Legal Heirs or devisees of the
Estate of Joseph L. Acheson a/k/a Joseph Lynn
Acheson, Sr., Deceased, Ronald Lee Dowell, and Ruth
C. Dowell, are Respondents

Appellant's Designation of Matter

Pursuant to Rule 209, SCACR, Appellant designates the following material for inclusion in the
record on appeal:

ORDERS:

1. Order granting Motion for Summary Judgment, October 9, 2015;
2. Order denying Motion to Reconsider, November 30, 2015;

PLEADINGS:

3. Complaint filed September 11, 2013;
4. Acheson Amended Answer and Counterclaim;

TRANSCRIPTS:

5. Transcript of Hearing, September 1, 2015;

MISCELLANEOUS/OTHER:

6. Affidavit of Acheson, July 9, 2015, with exhibits;
7. Acheson Motion for Summary Judgment, July 9, 2015
8. Chase Opposition to Acheson's Motion for Summary Judgment with exhibits;
9. Chase Motion to Reconsider, October 26, 2015;
10. Notice of Appeal;

Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to the appeal.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Michael J. Anzelmo
SC Bar No. 72933
E-Mail: michael.anzelmo@nelsonmullins.com
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, South Carolina 29201
803.799.2000

Attorneys for JPMorgan Chase Bank, National Association

Columbia, South Carolina

March 18, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis, Jr.
Circuit Court Judge

RECEIVED

MAR 18 2016

Case No. 2013-CP-10-05329
Appellate Case No. 2016-00002 **SC Court of Appeals**

JPMorgan Chase Bank, National Association, Appellant,

v.

Delilah Starr Acheson a/k/a Delilah S. Acheson a/k/a
Starr D. Acheson, individually, as Legal Heir and
Personal Representative of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,
Jacob Lee Acheson, and Daniel Alexander Acheson, as
Legal Heirs or devisees of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Ronald Lee Dowell, Ruth C. Dowell, and Charleston
County Revenue Collections, Defendants.

Of whom Delilah Starr Acheson a/k/a Delilah S.
Acheson a/k/a Starr D. Acheson, individually, as Legal
Heir and Personal Representative of the Estate of
Joseph L. Acheson a/k/a Joseph Lynn Acheson, Sr.,
Deceased, Amber Mae Acheson Reed, Joseph Lynn
Acheson, Jr., Jacob Lee Acheson, and Daniel
Alexander Acheson, as Legal Heirs or devisees of the
Estate of Joseph L. Acheson a/k/a Joseph Lynn
Acheson, Sr., Deceased, Ronald Lee Dowell, and Ruth
C. Dowell, are Respondents

PROOF OF SERVICE

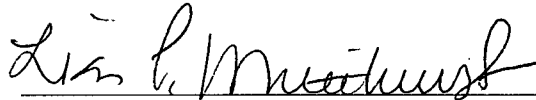
I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for JPMorgan Chase Bank, National Association, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Appellant's Designation of Matter to be Included in the Record on Appeal

Counsel Served:

Alice F. Paylor, Esquire
Rosen Rosen & Hagood, LLC
Post Office Box 893
Charleston, SC 29402



Lisa Whitehurst
Administrative Assistant

March 18, 2016

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
1320 Main Street / 17th Floor / Columbia, SC 29201
Tel: 803.799.2000 Fax: 803.255.9024
www.nelsonmullins.com

Michael J. Anzelmo
Tel: 803.255.9312
Fax: 803.255.9024
michael.anzelmo@nelsonmullins.com

March 18, 2016

RECEIVED

MAR 18 2016

SC Court of Appeals

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

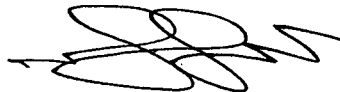
RE: JPMorgan Chase Bank, National Association v. Delilah Starr Acheson, et al.
Appellate Case No. 2016-000028
Our file no.: 11281/02229

Dear Ms. Kitchings:

Enclosed please find an original and one copy of the Initial Brief of Appellant and Appellant's Designation of Matter to be Included in the Record on Appeal in regard to the above-referenced matter. We would ask that you file the originals and return clocked-in copies to us via our courier.

By copy of this letter to counsel of record, we are serving them with copies of the brief and designation.

Very truly yours,



Michael J. Anzelmo

MJA:lpw
Enclosures
cc: Alice F. Paylor, Esquire