

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

JPMorgan Chase Bank, National Association,

Appellant,

v.

Delilah Starr Acheson a/k/a Delilah Starr 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, and
as Legal Heir and Personal Representative of the
Estate of Joseph L. Acheson a/k/a 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.

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**RESPONDENT'S DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

Respondent designates the following to be included 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;

TRANSCRIPT:

5. Transcript of hearing, September 1, 2015;

MISCELLANEOUS/OTHER:

6. Affidavit of Acheson, July 9, 2015, with exhibits;
7. Affidavit of Ruth C. Dowell, July 9, 2015
8. Affidavit of Ronald Lee Dowell, July 9, 2015
9. Acheson Motion for Summary Judgment, July 9, 2015
10. Chase Opposition to Acheson's Motion for Summary Judgment with exhibits;
11. Chase Motion to Reconsider, October 26, 2015;
12. Acheson Memorandum in Opposition to Motion to Reconsider, November 16, 2015;
13. Notice of Appeal

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I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

By: Alice F. Paylor
Alice F. Paylor, Esquire (SC # 4380)
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Attorneys for Respondents

May 16, 2016
Charleston, South Carolina

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The Honorable R. Markley Dennis, Jr.
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PROOF OF SERVICE

I do hereby certify that I have served all counsel of record in this action with a copy of the documents herein below specified by mailing a copy of the same by United States mail, postage prepaid, to the following addresses on **May 16, 2016**:

Documents: Respondents' Initial Brief and Designation of Matter

Counsel Served:

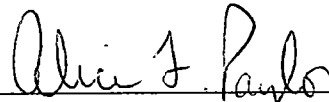
Michael J. Anzelmo, Esquire
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 11070
Columbia, SC 29211

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Respectfully submitted,



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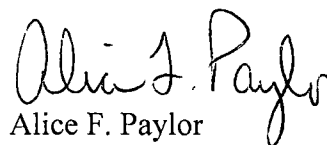
The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
PO Box 116229
Columbia, SC 29201

Re: JP Morgan Chase Bank, N.A. v. Delilah Starr Acheson
Case No. 2013-CP-05329
Appellate Case No. 2016-000028

Dear Ms. Kitchings:

Enclosed herewith please find an original and one copy of Respondents' Initial Brief and Designation of Matter and Proof of Service of same. If you would be so kind, please return a filed copy of the aforementioned documents in the enclosed self-addressed, pre-posted envelope.

Sincerely yours,


Alice F. Paylor

AFP/dlw
Enclosures
cc: Michael J. Anzelmo, Esquire (w/encl)