

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

Case No. 2010-CP-23-04223

Greer State Bank ..... Appellant,

v.

McKeown Property On Lake Robinson, LLC,  
Bruce A. McKeown, Robert M. McKeown,  
Cathy J. Lockhart, Rita W. McKeown and  
Connie S. Santoro f/k/a Connie McKeown ..... Defendants,

OF WHOM McKeown Property On Lake Robinson,  
LLC, Bruce A. McKeown and Rita W. McKeown are ..... Respondents.

**DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents propose the following be included in the Record on Appeal:

1. Order, dated August 2, 2011, entered August 3, 2011;
2. Order, dated July 22, 2011, entered July 25, 2011;
3. Lis Pendens, Summons and Notice, and Complaint;
4. Affidavit of Default;
5. Summons and Notice, Answer and Counterclaim of Defendants;
6. Amended Answer and Counterclaim of Defendants;
7. Plaintiff's Reply to Amended Answer and Counterclaim of McKeown Property On Lake Robinson, LLC, Bruce A. McKeown and Rita W. McKeown;
8. Amended Summons and Second Amended Answer and Counterclaim

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STATE COURT OF APPEALS  
APR 25 2012  
RECEIVED

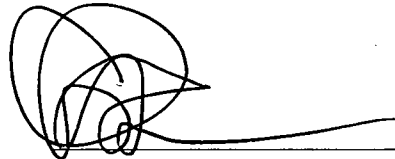
Defendants,

OF WHOM McKeown Property On Lake Robinson,  
LLC, Bruce A. McKeown and Rita W. McKeown are ..... Respondents.

**PROOF OF SERVICE**

I certify that I have served Initial Brief of Respondents McKeown Property On Lake Robinson, LLC, Bruce A. McKeown and Rita W. McKeown and Designation of Matter to be Included in the Record On Appeal on the **Appellant Greer State Bank** by depositing a copy of same in the United States Mail, postage prepaid on April 24, 2012 addressed to its attorneys of record, **Thomas W. Traxler and S. Brook Fowler, Carter, Smith, Merriam, Rogers &**

Traxler, P.A., P.O. Box 10828, Greenville, SC 29603.

A handwritten signature in black ink, appearing to be 'C. Groves', written over a horizontal line.

Charles M. Groves (Bar No. 2336)  
Chapman, Harter & Groves, P.A.  
1012 E. Washington Street (29601)  
P.O. Box 10224  
Greenville, SC 29603  
Phone: (864) 233-4500  
Fax: (864) 672-1537  
Attorney for Respondents

April 24, 2012

CHAPMAN, HARTER & GROVES, P.A.

ATTORNEYS AT LAW

P.O. BOX 10224 F.S.

GREENVILLE, SOUTH CAROLINA 29603

HARRY A. CHAPMAN, JR.  
RUSSELL W. HARTER, JR.  
CHARLES M. GROVES

April 24, 2012

CHARLES W. MARCHBANKS  
(1932-1979)

TELEPHONE  
(864) 233-4500

FACSIMILE  
(864) 232-1710

Thomas W. Traxler, Esq.  
S. Brook Fowler, Esq.  
Carter, Smith, Merriam, Rogers & Traxler, PA  
P.O. Box 10828  
Greenville, SC 29603

RE: *Greer State Bank vs. McKeown Property On Lake Robinson, LLC, Bruce A. McKeown, Robert M. McKeown, Cathy J. Lockhart, Rita W. McKeown and Connie S. Santoro f/k/a Connie S. McKeown*  
C.A. No.: 2010-CP-23-4223

Gentlemen:

Please find enclosed herewith Initial Brief of Respondents, Designation of Matter to be Included in the Record of Appeal and Proof of Service relative to the appeal in the above-referenced action. Should you have any questions, please do not hesitate to contact me.

With kind regards, I remain

Very truly yours;

CHAPMAN, HARTER & GROVES, P.A.

Charles M. Groves

CMG:ccb  
Enclosures

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SC COURT OF APPEALS

CHAPMAN, HARTER & GROVES, P.A.

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The Honorable Tanya A. Gee  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: *Greer State Bank v. McKeown Property On Lake Robinson, LLC, Bruce A. McKeown, Robert M. McKeown, Cathy J. Lockhart, Rita W. McKeown, and Connie S. Santoro f/k/a Connie S. McKeown*  
Tracking Number: 2011197229  
Case Number: 2010-CP-23-4223

Dear Ms. Gee:

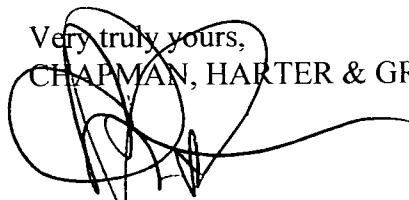
Enclosed for filing in the above-referenced matter is the original and one copy of the following: (1) Initial Brief of Respondents; (2) Designation of Matter to be Included in the Record On Appeal; and (3) Proof of Service. Please return a filed-stamped copy of these documents in the enclosed self-addressed stamped envelope.

By copy of this letter to Thomas W. Traxler and S. Brook Fowler, attorneys for Appellant, I hereby serve Appellant with a copy of the Initial Brief and Designation of Matter to be Included in the Record On Appeal of Respondents.

Should you have any questions or need anything further from me relative to this matter, please do not hesitate to contact me.

With kind regards, I remain

Very truly yours,  
CHAPMAN, HARTER & GROVES, P.A.



Charles M. Groves

CMG:ccb  
Enclosures

cc: Thomas W. Traxler, Esq. (w/enclosures)  
S. Brook Fowler, Esq.(w/enclosures)

SC Court of Appeals

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