

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAY 26 2016
SC Court of Appeals

APPEAL FROM JASPER COUNTY

Darrell Thomas Johnson, Jr., Special Referee

Appellate Case No. 2015-002049
Civil Action No.: 2013-CP-27-00253

Bank of Walterboro Plaintiff/Respondent,

v.

Charles E. Bush, aka Charles Bush, Rosemelle M. Shuler, First
Family
Financial Services of Georgia, Inc., EquiFirst Corporation,
Mortgage
Electronic Registration Systems, Inc., as nominee for BNC
Mortgage Inc.,
And South Carolina Department of Revenue Defendants,

Of Whom Mortgage Electronic Registrations Systems, Inc., is the
Appellant,

And

Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

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

Respondent, ROSEMELLE M. SHULER proposes the following be included in the Record on Appeal:

1. Notice of Appeal, filed September 29, 2015
2. ORDERS:
 - a) Order of Default and Reference filed September 29, 2015
 - b) Special Referee's Decree for Final Judgment of Foreclosure filed May 21, 2015
 - c) Form 4 Judgment in a Civil Case filed May 21, 2015
 - d) Order denying Motion to Re-open Judgment filed August 26, 2015
3. PLEADINGS:
 - a) Complaint filed May 13, 2013, including all exhibits
 - b) Notice of Hearing with Finality and Certificate of service, filed September 17, 2014
 - c) Notice of Re-Scheduled Hearing with Finality and Certificate of Service, filed October 16, 2014
 - d) Notice of Hearing with Finality filed May 8, 2015
 - e) Notice of Special Referee Sale filed May 21, 2015
 - f) Motion to Vacate and Set Aside Final Judgment of Foreclosure and Sale filed May 21, 2015 pursuant to Rule 60(b), SCRCF, filed July 15, 2015
 - g) Bank of Walterboro's Memorandum of Law and Argument of Counsel in Opposition to Rule 60 Motion filed by MERS filed July 23, 2015
 - h) Affidavit of James M Bunton, Jr., filed July 23, 2015, including all exhibits
 - i) Affidavit of Linda C. Jordan, filed July 23, 2015, including all exhibits
4. TRANSCRIPTS
 - a) Transcript of hearing on MERS' Rule 60, SCRCF, motion held July 23, 2015

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

May 24, 2016.

Law Office of R. Thayer Rivers, Jr.

A handwritten signature in cursive script, appearing to read "R. Thayer Rivers, Jr.", is written over a horizontal line.

R. THAYER RIVERS, JR.

Post Office Box 668

Ridgeland, South Carolina 29936

(843) 726-8136

Attorney for the Respondent Shuler

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Electronic Registration Systems, Inc., as nominee for BNC Mortgage Inc.,
And South Carolina Department of Revenue Defendants,

Of Whom Mortgage Electronic Registrations Systems, Inc., is the Appellant,

And


Bank of Walterboro and Rosemelle M. Shuler are the Respondents,

PROOF OF SERVICE

I certify that I have served the Initial Brief and Designation of Matter of the Respondent Rosemelle Shuler on the Appellant by depositing a copy of same in the United States Mail, postage prepaid, on May 24, 2016 addressed to its attorney of record, Sean A. O'Connor, Finkel Law Firm, LLC, 4000 Faber Place Drive, Suite 400, North Charleston, SC, 29405, and to the Respondent, Bank of Walterboro, by depositing a copy of same in the United States Mail, postage prepaid, on May 24, 2016 addressed to its attorney of record George W. Cone, Post Office Box 230, Walterboro, SC 29488, Kathleen Chewing Barnes, Post Office Box 897, Hampton, SC, 29924.

May 24, 2016.

LAW OFFICE OF R. THAYER RIVERS, JR.



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Attorney for the Respondent Rosemelle Shuler

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The Honorable Jenny Abbot Kitchings
Clerk of Court, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

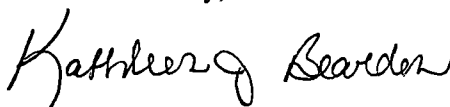
RE: MERS, INC. v. BANK OF WALTERBORO/SHULER
APPELLATE CASE NUMBER – 2015-002049

Dear Ms. Kitchings:

Enclosed herewith please find the original and one copy of the Respondent Shuler's Initial Brief and Designation of Matter in the above matter. Please return the clocked copy in the envelope provided.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

:kjb
Enclosure

cc: Sean A. O'Connor, Esquire
George W. Cone, Esquire
Kathleen C. Barnes, Esquire

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May 24, 2016

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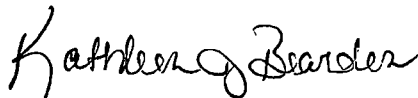
**RE: MERS, INC. v. BANK OF WALTERBORO/SHULER
APPEAL – 2015-002049**

Dear Messrs O'Connor and Cone, and Ms. Barnes:

Enclosed herewith please find the Respondent Shuler's Initial Brief and Designation of Matter in the above matter.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

:kjb
Enclosure
cc: SC Court of Appeals