



Law Office of
Bridget D Swing, LLC

BRIDGET D. SWING
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May19, 2016

RECEIVED

MAY 20 2016

SC Court of Appeals

VIA OVERNIGHT MAIL
Honorable Jenny Abott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Scott L. Butler and Jacqueline Butler, Appellants vs. New York Community Bank, Respondent
Court of Common Pleas Case No: 12-CP-29-0892

Dear Ms. Kitchens:

Attached for the Court's record, please find a copy of the Order to Admit W. Jeff Barnes, Esq. Pro Hac Vice to represent Scott and Jacqueline Butler.

Please do not hesitate to call if you require anything further from my office.

Sincerely,

Bridget D. Swing

CC with enclosure: Ms. Magalie A. Creech, Esq, Finkel Law Firm, PO Box 71727, North Charleston, SC 29415



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1220 Senate Street
Columbia, South Carolina 29201

RE: Scott L. Butler and Jacqueline Butler, Appellants vs. New York Community Bank, Respondent
Court of Common Pleas Case No: 12-CP-29-0892

Dear Ms. Kitchens:

On April 20th, our office filed on behalf of the Appellants a Motion for Leave to File a Motion to Vacate pursuant to Rule 60, SCRPC. The underlying case in this matter is a judicial foreclosure complaint against the Appellants' personal residence. A final foreclosure sale date is currently scheduled for June 6, 2016. The proposed 60(b) Motion to Vacate the Order of Foreclosure and Sale is based on the fact that over 50% of Appellants property is located in Mecklenburg County, North Carolina. Based on the June 6th sale date, Appellants have little time for their 60(b) motion to be filed and heard by the Special Referee (provided, of course, that the Court of Appeal grants our Motion for Leave to File). I would further note that a Complaint for Declaratory and Other Relief has been filed in Mecklenburg County, North Carolina seeking, among other things, that court's determination as to North Carolina's jurisdiction over that portion of the property that is located in North Carolina and seeking a preliminary injunction barring the foreclosure, sale, conveyance, or other disposition of Appellant's property that is located in North Carolina pending a full disposition of the North Carolina complaint. A file stamped copy of that Complaint is attached hereto for the Court's reference.

Based on the above, the Appellants are respectfully requesting that its Motion for Leave to File be expedited and considered by the Court at its earliest possible convenience. Our check for \$25.00 is enclosed as the required motion fee.

P.O. Box 8246
Greenville, SC 29604

111 E. North Street
Greenville SC 29601



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SC Court of Appeals

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By copy of this letter, I am serving a copy of this motion to counsel for the Respondent.

Please do not hesitate to call if you require anything further from me at this time.

Sincerely,

Bridget D. Swing

CC with enclosure: Ms. Magalie A. Creech, Esq, Finkel Law Firm, PO Box 71727, North Charleston, SC 29415

Envelope
Use this envelope twice!

SHEPARD AND SWING LAW FIRM
224 S. GROVE STREET, UNIT G
HENDERSONVILLE, NC 28792
UNITED STATES US

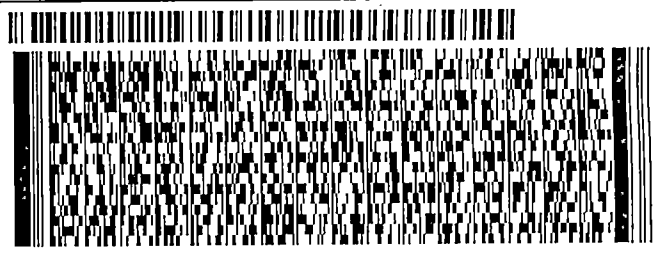
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TO HONORABLE JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890 REF:
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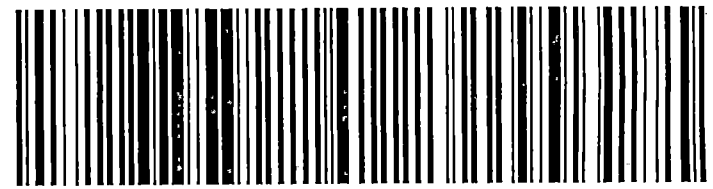
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