

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY

COURT OF COMMON PLEAS

Hon. Michael G. Nettles, Circuit Court Judge

RECEIVED

AUG 23 2016

SC Court of Appeals

Appellate Case No: 2016-001526

The Bank of New York Mellon f/k/a,  
The Bank of New York, as Trustee for the  
Benefit of Certificate Holders of Popular  
ABS, Inc. Mortgage Pass-Through  
Certificates Series 2006-E,.....Respondents,

v.

Charles Taylor, Burgess Brogdon Bldg. Supply,  
Palmetto Health Alliance,

Of Whom Charles Taylor is the.....Appellant.

APPELLANT'S RETURN TO  
RESPONDENTS' 8-16-16 MOTION TO  
STRIKE IMPROPER DESIGNATIONS

That Charles Taylor, (Hereinafter Appellant), return to The Bank of New York Mellon, et al.,  
(Hereinafter Respondents) motion to strike and responds as follows:

1. That Appellant will chance making this a short reply vs. a long one, & in that light..regarding  
the concerns raised in Respondents' motion, the Appellant attaches herewith his preliminary

index pages 2, (ex. a & b herewith), prepared for the Record on Appeal, (pending adjusting with Respondents' matter upon receipt), &;

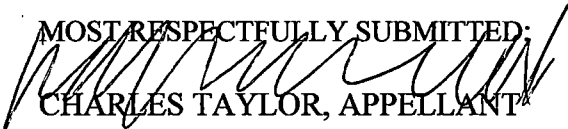
2. That these pages attached already reflect the concerns raised in Respd's. 8-16-16 motion; except the two letters attached as, (ex. c & d), herewith that Respondents want stricken and that the Appellant will do so if the court orders, &;

3. That they are only included because of the dates therein indicating what transpired per the body of the letters, which dates are in the court filings & that such simple letters will avoid a dispute, if it arises upon appeal, as to these dates and what transpired, again, per the body of the letters, if these are in fact not something Respondents wishes to hide, their inclusion for said reasons should be ok., because such are very relevant to the issues on appeal & all else on a-b attached, &;

4. That I believe that I can say, without fear of contradiction, that all other matter on the a & b exhibits attached are in the lower court's file with whatever attachments they were filed with as would be the same as was copied / served to the Respondents at the same time, which they can check the lower court's file if they, for whatever reason, somehow misplaced theirs, &;

5. That Apln't. hope this short reply addresses satisfactorily Respd's. motion which they can now dismiss hopefully or leave for the court's ruling--which Appellant believe should now be denied.

MOST RESPECTFULLY SUBMITTED:

  
CHARLES TAYLOR, APPELLANT  
332 MYRTLE BEACH HIGHWAY  
SUMTER SOUTH CAROLINA 2915  
(803) 609-7990-UGCARDS@AOL.COM  
FOR THE APPELLANT PRO SE

Sumter, South Carolina

August 22, 2016

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*(Appeal from the Above).*

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As Attached to Each / Pleading / Motion / Affidavit /

Filed-Date-Above (*pages 11-96*)

all copied to Respd’s. & can be match against court file

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STATE OF SOUTH CAROLINA  
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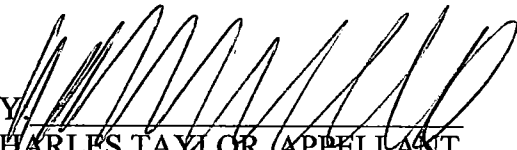
Charles Taylor, Burgess Brogdon Bldg. Supply,  
Palmetto Health Alliance,

Of Whom Charles Taylor is the.....Appellant.

PROOF OF SERVICE

I certify that I file 6+1 & serve 1 Applt's. 8-22-16 Return to Respd's. 8-16-16 Motion by  
depositing them in the U.S Mail, postage prepaid, on the date below, from Sumter, S. C.  
address to Respds'. Counsel listed below at the address listed below & to clerk's office.

August 22, 2016

BY:   
CHARLES TAYLOR, APPELLANT  
332 MYRTLE BEACH HIGHWAY  
SUMTER SOUTH CAROLINA 29153  
(803) 609-7990

Respondents' Counsel of Record:  
Lead-Sara B. Nielsen, Esq.  
B. Rush Smith, III., Esq.  
Of Nelson, Mullins, Riley & Scarborough, LLP.  
1320 Main Street / 17<sup>th</sup> Floor  
P O Box 11070 (29211-1070)  
Columbia, SC. 29201  
(803) 799-2000

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP  
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Sarah B. Nielsen  
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sarah.nielsen@nelsonmullins.com

March 31, 2016

## Via United States Mail

Charles Taylor  
334 Myrtle Beach Highway  
Sumter, SC 29153

RE: The Bank of New York Mellon f/k/a The Bank of NY v. Charles Taylor, et al.  
Civil Action No. 11-CP-43-0167  
Our File No. 36266/01512

Dear Mr. Taylor:

Enclosed please find and served upon you, the Order Lifting Stay of Proceedings signed by the Honorable George C. James, Jr. in the above-referenced matter.

Very truly yours,

  
Sarah B. Nielsen

Enclosure

cc: S. Nelson Weston, Jr., Esq.

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP  
Attorneys and Counselors at Law  
1320 Main Street / 17th Floor / Columbia, SC 29201  
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Sarah B. Nielsen  
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sarah.nielsen@nelsonmullins.com

July 14, 2016

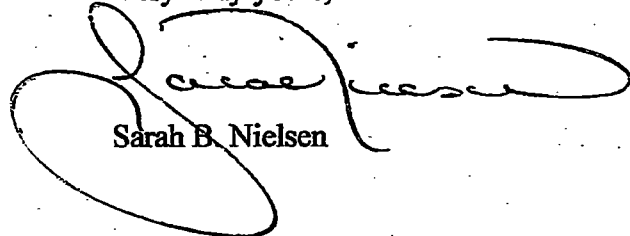
Charles Taylor  
334 Myrtle Beach Highway  
Sumter, SC 29153

RE: The Bank of New York Mellon f/k/a The Bank of NY v. Charles Taylor, et al.  
Civil Action No. 11-CP-43-0167  
Our File No. 36266/01512

Dear Mr. Taylor:

Enclosed please find and served upon you the Answers to Defendant Charles Taylor's June 14, 2016 Interrogatories, Responses to Charles Taylor's June 14, 2016 Requests for Production of Documents, and corresponding document production bates-labeled BNYM (Taylor) 0001.

Very truly yours,



Sarah B. Nielsen

SBN:cr  
Enclosures

August 22, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina  
Court of Appeals  
1015 Sumter Street  
Columbia, S. C. 29201

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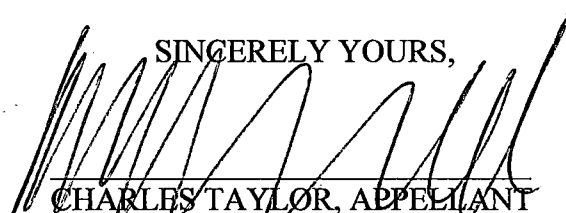
Dear Mrs. Kitchings:

Please find enclosed for filing the following:

(1). Aplnt's. 8-22-16 Return to Resp'd's. 8-16-16 Motion w/ 6+1 to you & 1 copy to counsel.

Please clock & return the 8<sup>th</sup> copy to me in the self-addressed stamped envelope. THANKS!

SINCERELY YOURS,

  
CHARLES TAYLOR, APPELLANT  
332 MYRTLE BEACH HIGHWAY  
SUMTER SOUTH CAROLINA 29153  
(803) 609-7990

Respondents' Counsels of Record:  
Lead-Sara B. Nielsen, Esq.  
B. Rush Smith, III., Esq.  
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Charles Taylor  
334 Myrtle Bch Hwy  
Sumter SC 29153



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