

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
AUG 25 2016  
SC Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

The Honorable Joe M. Crosby, Master-in-Equity

Case No. 2011-CP-22-00180

Appellate Case No. 2013-001447

Kennedy Funding, Inc. as predecessor-in-interest, and BNP Paribas.....Respondents,

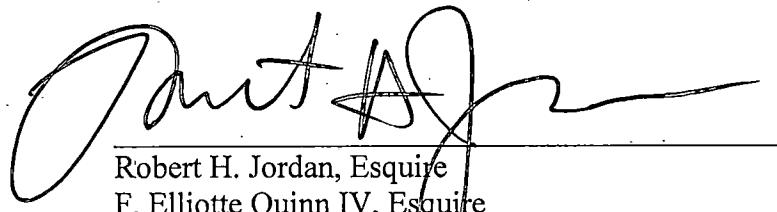
v.

Pawleys Island North, LLC, Will Darwin Wheeler, Peggy Wheeler-Cribb, and J. Mars Sapp,  
Defendants, of whom Pawleys Island North, LLC, Will Darwin Wheeler and Peggy Wheeler-  
Cribb are Respondents and

J. Mars Sapp is the .....Appellant.

**CERTIFICATE OF COUNSEL**

The undersigned hereby certifies that this Supplemental Brief of Respondent complies  
with Rule 211(b), SCACR.



Robert H. Jordan, Esquire  
F. Elliotte Quinn IV, Esquire  
Parker Poe Adams & Bernstein LLP  
200 Meeting Street, Suite 301  
Charleston, SC 29401  
(843) 727-2670

Attorneys for Respondents Kennedy Funding, Inc.  
and BNP Paribas

August 24, 2016



Robert H. Jordan  
*Partner*  
Telephone: 843.727.2670  
Direct Fax: 843.727.2680  
robertjordan@parkerpoe.com

Atlanta, GA  
Charleston, SC  
Charlotte, NC  
Columbia, SC  
Greenville, SC  
Raleigh, NC  
Spartanburg, SC

August 24, 2016

**VIA OVERNIGHT DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
AUG 25 2016  
SC Court of Appeals

Re: Kennedy Funding, Inc., as predecessor-in-interest, and BNP Paribas v. Pawleys  
Island North, LLC, et al  
State Court Case No. 2011-CP-22-00180  
Appellate Case No. 2013-001447

Dear Ms. Kitchings:

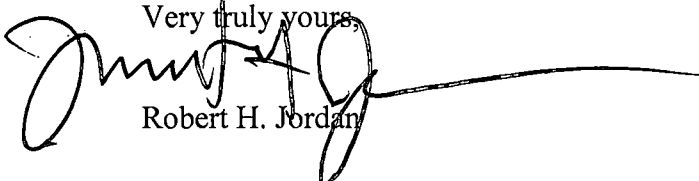
Enclosed for filing please find an original and a copy of each of the following:

1. Certificate of Counsel relating to the Supplemental Brief of Respondents; and
2. Motion to be Relieved as Counsel.

Also enclosed is the filing fee for the Motion to be Relieved as Counsel.

Please file originals and return clocked copies in the self-addressed, stamped envelope provided.

By copy of this letter, we are serving the same on opposing counsel.

Very truly yours,  
  
Robert H. Jordan

RHJ/kjg  
Enclosures

cc: Thomas W. Bunch, II, Esq.  
Robert H. Gwinn, III, Esq.  
Merrit G. Abney, Esq.

PPAB 3379130v1

ORIGIN ID:CHSA (843) 727-2693  
ROBERT H. JORDAN  
PARKER POE ADAMS  
200 MEETING STREET  
SUITE 301  
CHARLESTON, SC 29401  
UNITED STATES US

SHIP DATE: 24AUG16  
ACTWGT: 1.00 LB  
CAD: 3595849/INET3790

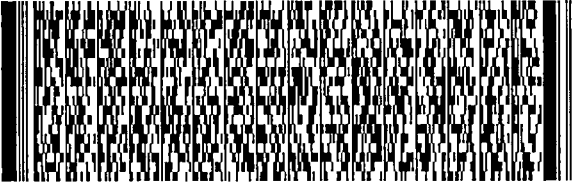
BILL SENDER

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

COLUMBIA SC 29201

(803) 734-1890 REF: 149845  
INV:  
PO: DEPT:

544J1737014EB



FedEx Express



41122016172501uy

THU - 25 AUG 10:30A  
PRIORITY OVERNIGHT

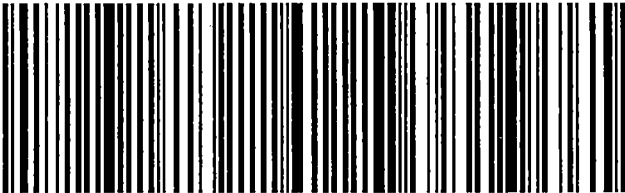
TRK# 7770 6931 9065  
0201

ASR

28 USCA

29201

SC-US CAE



RECEIVED

AUG 25 2016

SC Court of Appeals