

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM DILLON COUNTY  
Court of Common Pleas

Harry R. Easterling, Jr., Special Referee

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Case No. 2012-CP-17-0060  
Court of Appeals No. 2015-000985

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SC Court of Appeals

Bank of America, N.A. successor by merger to BAC Home Loans Servicing, LP f/k/a  
Countrywide Home Loans Servicing, LP..... Respondent.

v:

Shawn L. Bethea; South Carolina Department of Motor Vehicles, Defendants,  
Of whom Shawn L. Bethea is the.....Appellant.

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**RESPONDENT'S OBJECTION TO APPELLANT'S MOTION SUPPLEMENT THE  
RECORD ON APPEAL**

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*Attorney for Respondent*

Date: September 7, 2016

Pursuant to Rule 210(c) of the South Carolina Rules of Civil Procedure, Respondent hereby objects to Appellant's Motion to Supplement the Record on Appeal in this matter. Rule 210(c) expressly states that no materials that were not submitted to the lower court may be included in the Record on Appeal. Appellant expressly states in his motion that he "recently came into possession" of the documents he wishes to add to the Record on Appeal. As such, these materials could not have been presented to the lower court from which this appeal arises.

WHEREFORE, for the reasons stated above, Respondent prays that the Court issue an order DENYING Appellant's Motion to Supplement the Record on Appeal.



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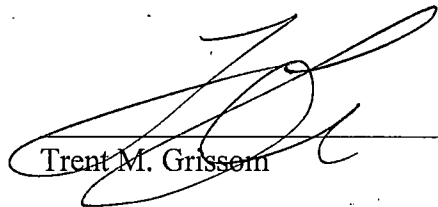
*Attorney for Respondent*

**CERTIFICATE OF SERVICE**

The undersigned certifies that this designation of matter for record on appeal was served on Appellant by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

Shawn L. Bethea  
1317 Gordonville Court  
Dillon, SC 29536

This the 7<sup>th</sup> day of September, 2016.



Trent M. Grissom

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September 7, 2016

**VIA FEDERAL EXPRESS**  
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Jenny Abbott Kitchings  
Clerk of Court – Court of Appeals  
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Columbia, SC 29201

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SC Court of Appeals

**RE: Bank of America, N.A. v. Shawn L. Bethea, et al.**  
**Court of Appeals No. 2015-000985**  
**Case No. 2012-CP-17-0060 (Dillon County)**

Dear Clerk:

Enclosed for filing are the original and six copies of the *Respondent's Objection to Appellant's Motion to Supplement the Record on Appeal* in this matter. Please file the Objection and return a file-stamped copy to our office in the self-addressed, stamped envelope also included.

Thank you for your attention to this matter. If you have any questions, please contact our office.

Sincerely,

McGUIREWOODS LLP



Cindy J. West  
Practice Assistant to Trent M. Grissom

/cjw  
Enclosures

cc: Shawn L. Bethea (w/encl.)

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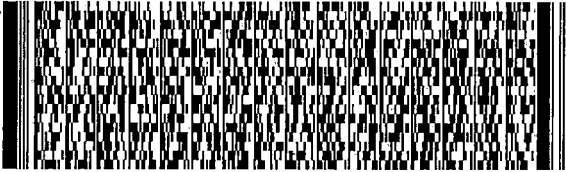
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**CLERK OF COURT - COURT OF APPEALS**  
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**COLUMBIA SC 29201**

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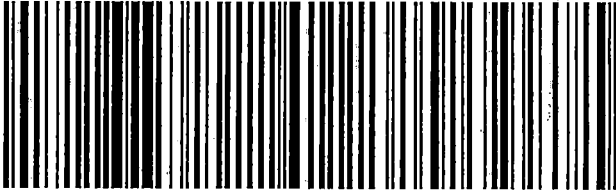
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SC Court of Appeals