

Nelson Mullins

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Michael J. Anzelmo

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April 7, 2017

Hand Delivered

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

1220 Senate Street (29201)

Post Office Box 11629

Columbia SC 29211

RECEIVED

APR 07 2017

SC Court of Appeals


RE: HSBC Bank USA, National Association v. Clifford L. Ryba, et al.
South Carolina Court of Appeals, Charleston County
Appellate Case No. 2016-001054
Our File No. 42753.01607

Ms. Kitchings:

I am in receipt of your letter dated April 6, 2017, regarding Matthew Tillman as "counsel for appellant" in this action. I represent Appellant in this action along with Erica Lybrand, Esquire. Mr. Tillman has not participated in the appeal, and neither Appellant nor Respondent included Mr. Tillman on any filing in this action to date. See, e.g., Certificates of Service from Appellant and Respondent's Final Briefing, attached hereto as Exhibit A; Certificates of Service from Appellant and Respondent's Initial Briefing, attached hereto as Exhibit B; Certificate of Service of Record on Appeal, attached hereto as Exhibit C.

In short, Mr. Tillman has not been counsel for Appellant at any stage of this appeal. Appellant does not believe Mr. Tillman needs to be added to any documents referenced in your letter. The more expedient and cost-effective solution may be to have Mr. Tillman relieved as counsel of record for Appellant if the Court records show such representation.

Very truly yours,



Michael J. Anzelmo

MJA:ckh

The Honorable Jenny Abbott Kitchings
April 7, 2017
Page 2

cc: Erica G. Lybrand, Esquire
J. Kevin Holmes, Esquire

EXHIBIT A

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master In Equity

Appellate Case No. 2016-001054

HSBC Bank USA, National Association, as Trustee for
the Holders of the Deutsche ALT-A Securities, Inc.
Mortgage Loan Trust, Mortgage Pass-Through
Certificates Series 2007-OA4, assignee of Bank of
America N.A., successor by merger to BAC Home
Loans Servicing L.P., f/k/a Countrywide Home Loans
Servicing, Inc.,

Appellant,

v.

Clifford L. Ryba; Beverly Ryba;
Regions Bank; First Federal Savings
and Loan Association of Charleston; Citibank (South
Dakota) N.A., and Carol Garfield Goldberg,

Defendants,

Of whom Carol Garfield Goldberg is the,

Respondent.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley
& Scarborough LLP, attorneys for HSBC Bank USA, National Association, as Trustee for the
Holders of the Deutsche ALT-A Securities, Inc. Mortgage Loan Trust, Mortgage Pass-
Through Certificates Series 2007-OA4, assignee of Bank of America N.A., successor by
merger to BAC Home Loans Servicing L.P., f/k/a Countrywide Home Loans Servicing, Inc.,

do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **FINAL BRIEF OF APPELLANT**

FINAL REPLY BRIEF OF APPELLANT

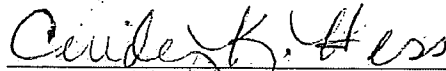
Counsel Served:

U.S. Mail

Erica G. Lybrand, Esquire
Rogers Townsend & Thomas, PC
1221 Main Street, 14th Floor
Post Office Box 100200
Columbia, SC 29202

U.S. Mail

J. Kevin Holmes, Esquire
The Steinberg Law Firm
61 Broad Street
Charleston, SC 29401



Cindy K. Hess
Sr. Administrative Assistant

March 31, 2017

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MAR 31 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2016-001054

HSBC Bank USA, National Association, as Trustee for
The Holders of the Deutsche ALT-A Securities, Inc.
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Certificates Series 2007-0A4, assignee of Bank of
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Loans Servicing L.P., f/k/a Countrywide Home Loans
Servicing, Inc., Appellant,

v.

Clifford L. Ryba; Beverly Ryba; Regions Bank;
First Federal Savings and Loan Association of
Charleston; Citibank (South Dakota) N.A., and
Carol Garfield Goldberg Defendants,

Of whom Carol Garfield Goldberg is the Respondent.

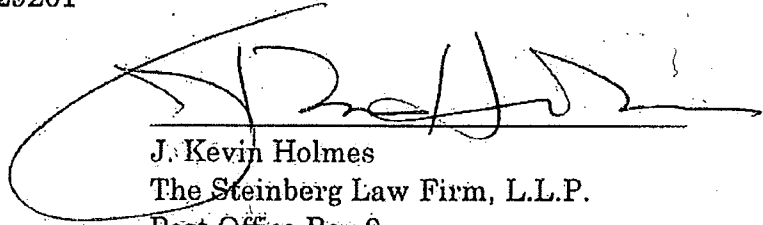
PROOF OF SERVICE

I, J. Kevin Holmes, attorney for the Respondent, certify that I deposited a copy of the Final Brief of the Respondent in the U.S. Mail, postage Prepaid, addressed to the following attorneys of record:

Michael J. Anzelmo, Esquire
Nelson Mullins Rile and Scarborough, L.L.P.
1320 Main Street, 17th Floor

Columbia, South Carolina 29201

Erica G. Lybrand, Esquire
Rogers Townsend & Thomas, PC
1221 Main Street, 14th Floor
Columbia, SC 29201

A handwritten signature in black ink, appearing to read "J. Kevin Holmes", is written over a horizontal line. The signature is stylized and cursive.

J. Kevin Holmes
The Steinberg Law Firm, L.L.P.
Post Office Box 9
Charleston, South Carolina 29402
Attorney for the Respondent

Charleston, South Carolina

28th day of March, 2017.

EXHIBIT B

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master In Equity

Appellate Case No. 2016-001054

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the Holders of the Deutsche ALT-A Securities, Inc.
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Appellant,

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Regions Bank; First Federal Savings
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Defendants,

Of whom Carol Garfield Goldberg is the,

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merger to BAC Home Loans Servicing L.P., f/k/a Countrywide Home Loans Servicing, Inc.,

do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **AMENDED INITIAL BRIEF OF APPELLANT**

Counsel Served:

U.S. Mail

Erica G. Lybrand, Esquire
Rogers Townsend & Thomas, PC
1221 Main Street, 14th Floor
Post Office Box 100200
Columbia, SC 29202

U.S. Mail

J. Kevin Holmes, Esquire
The Steinberg Law Firm
61 Broad Street
Charleston, SC 29401



Eileen Hindman
Sr. Administrative Assistant

February 13, 2017

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2016-001054

HSBC Bank USA, National Association, as Trustee for
the Holders of the Deutsche ALT-A Securities, Inc.
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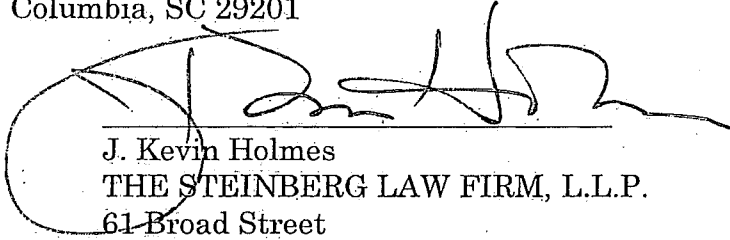
PROOF OF SERVICE

I, J. Kevin Holmes, attorney for the Respondent, certify that I deposited a
copy of the Initial Brief to the Respondent and Respondent's Designation of Matter
to be Included in the Record on Appeal in the U.S. Mail, postage prepaid, address to
the following attorneys of record:

Michael J. Anzelmo, Esquire
Nelson Mullins

Post Office Box 11070 (29211-1070)
Columbia, SC 29201

Erica G. Lybrand, Esquire
Rogers, Townsend & Thomas, PC
1221 Main Street, 14th Floor
Columbia, SC 29201

A handwritten signature in black ink, appearing to read "J. Kevin Holmes", is written over a horizontal line. The signature is stylized and somewhat cursive.

J. Kevin Holmes
THE STEINBERG LAW FIRM, L.L.P.
61 Broad Street
Post Office Box 9
Charleston, South Carolina 29402
(843) 720-2800
Attorney for the Respondent

Charleston, South Carolina

13 day of January, 2017

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM COUNTY
Court of Common Pleas

FEB 13 2017

Mikell R. Scarborough, Master In Equity

SC Court of Appeals

Appellate Case No. 2016-001054

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Pleadings: **INITIAL REPLY BRIEF OF APPELLANT**

Counsel Served:

U.S. Mail

Erica G. Lybrand, Esquire
Rogers Townsend & Thomas, PC
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Post Office Box 100200
Columbia, SC 29202

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The Steinberg Law Firm
61 Broad Street
Charleston, SC 29401



Eileen Hindman
Sr. Administrative Assistant

February 13, 2017

EXHIBIT C

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master In Equity

Appellate Case No. 2016-001054

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Pleadings:

Record on Appeal

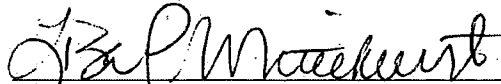
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J. Kevin Holmes, Esquire
The Steinberg Law Firm
61 Broad Street
Charleston, SC 29401



Lisa P. Whitehurst
Administrative Assistant

March 14, 2017