

**THE STATE OF SOUTH CAROLINA
In The Court Of Appeals**

**APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas**

Carl A. Saleeby, Special Referee

Case No. 2017-000966

RECEIVED

MAY 22 2017

SC Court of Appeals

**Thomas E. Goodson, as Trustee of the Residuary
Beneficiaries Trust of the Estate of Margaret S.
Goodson and the Estate of Helen S. Goodson, Respondent,**

vs.

**Harriet E. Wilmeth, Debra J. Freeman, Bank of
America, N.A., Lumber Yard, Inc., St. Bartholomew's
Episcopal Church, Canal Wood, LLC, Alexander C.
West, Alexander C. West, Jr., Airport Technologies, LLC,
Mutual Savings Bank, State of South Carolina Department
of Revenue, United States of America Acting through
the Department of Treasury/Internal Revenue Service,
Ford Motor Credit Company, LLC, James Gandy, Estate
of Amelia H. Anthony, Estate of Betty C. Wiggins,
Portfolio Recovery Assoc., South Carolina Department
of Probation, Parole and Pardon Services, Norwood
C. Bizzell, Ronert "B.W." Bizzell, William E. Bizzell,
Mary Lathan Steele and Vicki Eaddy, Defendants,**

Of Whom Debra J. Freeman is the.. . . . Appellant.

**APPELLANT'S DESIGNATION OF MATTERS TO BE
INCLUDED IN THE RECORD ON APPEAL**

Appellant Debra J. Freeman respectfully requests that the following matters be included in
the Record on Appeal:

1. Summons and Notice of Foreclosure of Judgments (12/22/2015)
2. Complaint (Foreclosure of Judgment Liens) Non-Jury (12/22/2015)
3. Defendant Bank of America N.A.'s Answer to Plaintiff's Complaint (1/28/2016)

4. Defendant Debra J. Freeman's Answer to Plaintiff's Complaint (3/21/2016)
5. Defendant Bank of America's Notice of Motion for Summary Judgment (1/27/2017)
6. Defendant Bank of America's Memorandum in Support of Defendant's Bank of America N.A.'s Motion for Summary Judgment (1/22/2017)
7. Order of Protection filed by Attorney Robert E. Lee (2/8/2016)
8. Email correspondence from Attorney Lee to Judge Henderson, dated February 17, 2016, concerning the proposed Order of Protection dated February 17, 2016
9. Letter dated February 17, 2016 from Attorney Lee to Judge Henderson concerning the proposed Order of Protection
10. Defendant Debra J. Freeman's Motion to Dismiss Pursuant to Rule 12(c), SCRCP (3/8/2017)
11. Transcript of March 9, 2017 Hearing.
12. Plaintiff's Ex. 1 to Transcript of March 9, 2017 Hearing: Deed to Wilmeth and Freeman dated March 30, 1984.
13. Plaintiff's Ex. 2 to Transcript of March 9, 2017 Hearing: Mortgage from Wilmeth and Freeman to Bank of America in the original sum of \$234,666, dated Nov. 18, 2002
14. Plaintiff's Ex. 4 to Transcript of March 9, 2017 Hearing: Transcript of Judgment dated February 3, 2006 for \$317,970.97
15. Plaintiff's Ex. 5 to Transcript of March 9, 2017 Hearing: Assignment of Judgment
16. Plaintiff's Ex. 6 to Transcript of March 9, 2017 Hearing: Execution Returned to Clerk Nullo Bona, dated December 22, 2015
17. Plaintiff's Ex. 7 to Transcript of March 9, 2017 Hearing: Judgment, dated February 3, 2006
18. Plaintiff's Ex. 8 to Transcript of March 9, 2017 Hearing: Assignment of Judgment
19. Plaintiff's Ex. 9 to Transcript of March 9, 2017 Hearing: Execution of Judgment for the sum of \$150,000 returned to Clerk Nulla Bona, dated December 22, 2015
20. Plaintiff's Ex. 43 to Transcript of March 9, 2017 Hearing: Order Approving Trust Agreement
21. Final Order: Court of Common Pleas of Darlington County, South Carolina (April 7, 2017)

22. Notice of Sale (April 7, 2017)

23. Notice of Appeal

Appellant Debra J. Freeman attaches hereto her certification that this designation contains only matters material to her appeal.

Dated: May 19 2017

Respectfully submitted,

ROBERT E. LEE, LLC

By: 

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Mutual Savings Bank, State of South Carolina Department
of Revenue, United States of America Acting through
the Department of Treasury/Internal Revenue Service,
Ford Motor Credit Company, LLC, James Gandy, Estate
of Amelia H. Anthony, Estate of Betty C. Wiggins,
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of Probation, Parole and Pardon Services, Norwood
C. Bizzell, Ronert "B.W." Bizzell, William E. Bizzell,
Mary Lathan Steele and Vicki Eaddy, Defendants,**

Of Whom Debra J. Freeman is the..... Appellant.

APPELLANT'S CERTIFICATION

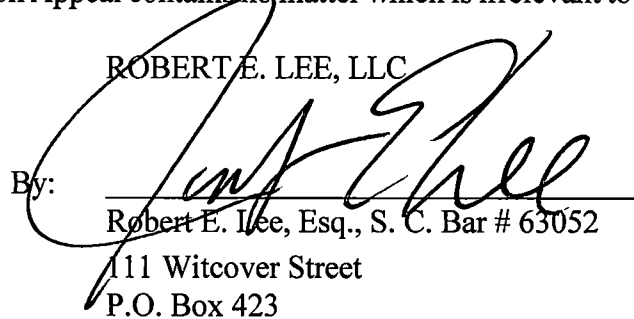
Pursuant to Appellate Rule 209, South Carolina Rules of Appellate Procedure, Appellant
Debra J. Freeman's counsel of record, Robert E. Lee, Esquire, certifies that the Designation of

Matters to be Included in the Record on Appeal contains no matter which is irrelevant to the appeal.

Dated: May 19, 2017

ROBERT E. LEE, LLC

By: _____


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Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Appellant's Designation of Record on Appeal and the Certification attached thereto, to be mailed, first-class postage prepaid to the following on this 19 day of May 2017.

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<p>J. Alex Stanton IV, Esquire Stanton Law Firm 954 West Carolina Avenue Hartsville, SC 29550 <i>Counsel for the Plaintiff</i></p> <p>Harriet E. Wilmeth 4245 Pinto Lane Myrtle Beach, SC 29588 <i>Defendant</i></p> <p>Caroline R. Glenn, Esquire Chad W. Burgess, Esquire Brock & Scott, PLLC 3800 Fernandina Road, Suite 110 Columbia, SC 29210 <i>Counsel for Defendant</i> <i>Bank of America, N.A.</i></p> <p>Phil Dixon, President Lumber Yard, Inc. P.O. Box 249 Hartsville, SC 29551 <i>Defendant</i></p> <p>John R. Chase, Esquire Haynsworth Sinkler Boyd, PA P.O. Box 340 Charleston, SC 29402-0340 <i>Counsel for Defendant</i> <i>St. Bartholomew's Episcopal Church</i></p>	<p>Martin S. Driggers Jr., Esquire Sweeny Wingate & Barrow, PA 115 Cargill Way, Suite B Hartsville, SC 29550 <i>Counsel for Defendants</i> <i>Alexander C. West and</i> <i>Alexander C. West, Jr.</i></p> <p>Theodore von Keller, Esquire Crawford & von Keller, LLC P.O. Box 4216 Columbia, SC 29240 <i>Counsel for Defendant</i> <i>Airport Technologies, Inc.</i></p> <p>Mutual Savings Bank 330 West Carolina Avenue Hartsville, SC 29550 <i>Defendant</i></p> <p>Brittany L. Kilpatrick, Esquire South Carolina Department of Revenue Office of General Counsel P.O. Box 12265 Columbia, SC 29211 <i>Counsel for Defendant</i> <i>South Carolina Department of Revenue</i></p> <p>William N. Nettles, Esquire United States Attorney 1441 Main St., Suite 500 Columbia, SC 29201 <i>Counsel for Defendant United States of</i> <i>America/Internal Revenue Service</i></p>
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