

**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

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JUN 19 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,**

v.

**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, Robert "B.W" Bizzell, William E. Bizzell,
Mary Lathan Steele, and Vicki Eaddy, Defendants.**

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

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

The Respondent, Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, respectfully requests that the following matters be included in the Record on Appeal:

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

4. Answer to Plaintiff's Complaint by the Estate of Amelia H. Anthony and Counterclaim of the Estate of Amelia H. Anthony, dated January 13, 2016 (filed on 1/15/2016)
5. Answer of the Defendant, Alexander C. West, dated January 20, 2016 (filed on 1/22/2016)
6. Answer of the Defendant, Alexander C. West, Jr., dated January 20, 2016 (filed on 1/22/2016)
7. Answer of the Defendant, Debra J. Freeman, to Plaintiff's Complaint, dated February 15, 2016 (filed on 2/18/2016)
8. Amended Answer and Cross-Claim of the Defendant, Debra J. Freeman, to Plaintiff's Complaint, dated February 15, 2016 (filed on 3/21/2016)
9. Order of Reference With Finality, dated February 8, 2015 (filed on 2/11/2016)
10. Plaintiff's Notice of Hearing for February 19, 2016, dated February 12, 2016 (filed on 2/16/2016)
11. Plaintiff's Affidavit of No Answer to Plaintiff's Complaint as to the Defendant, Harriet E. Wilmeth, dated February 19, 2016 (filed on 2/19/2016)
12. Order of Protection filed by Attorney Robert E. Lee, dated February 18, 2016 (filed on 2/18/2016)
13. Email correspondence from Attorney Lee to Judge Henderson, dated February 17, 2016, concerning the proposed Order of Protection dated February 18, 2016
14. Letter dated February 17, 2016 from Attorney Lee to Judge Henderson concerning the proposed Order of Protection
15. Defendant Bank of America's Notice of Motion for Summary Judgment, dated January 24, 2017 (filed on 1/27/2017)
16. Defendant Bank of America's Memorandum in Support of Defendant's Bank of America N.A.'s Motion for Summary Judgment dated January 24, 2017 (filed on 1/27/2017)
17. Bank of America's Notice of Hearing on Defendant's Motion for Summary Judgment scheduled for March 9, 2017, dated February 14, 2017 (filed on 2/16/2017)
18. Plaintiff's Notice of Hearing scheduled for March 9, 2017, dated March 2, 2017 (filed on 3/6/2017)
19. Defendant Debra J. Freeman's Motion to Dismiss Pursuant to Rule 12(c), SCRCF, dated March 8, 2017 (filed on 3/8/2017)

20. Transcript of March 9, 2017 Hearing (filed on 4/7/2017)
21. Plaintiff's Ex. 1 to Transcript of March 9, 2017 Hearing: Deed to Wilmeth and Freeman dated March 30, 1984
22. 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 November 18, 2002, (filed on 11/25/2002)
23. Plaintiff's Ex. 4 to Transcript of March 9, 2017 Hearing: Transcript of Judgment in favor of the Estate of Helen S. Goodson against Harriet E. Wilmeth in the Darlington County Probate Court dated February 20, 2006 in the sum of \$317,970.97 which was filed in the Office of the Clerk of Court for Darlington County on February 20, 2006. Recorded as Judgment Roll Number 54639
24. Plaintiff's Ex. 5 to Transcript of March 9, 2017 Hearing: Assignment of Judgment Roll Number 54639 from the Estate of Helen S. Goodson to Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, dated November 18, 2013 and filed on November 21, 2013
25. Plaintiff's Ex. 6 to Transcript of March 9, 2017 Hearing: Execution returned to Clerk of Court Nulla Bona, dated November 30, 2015 and filed with the Office of the Clerk of Court for Darlington County on December 22, 2015
26. Plaintiff's Ex. 7 to Transcript of March 9, 2017 Hearing: Transcript of Judgment in favor of the Estate of Margaret S. Goodson against Harriet E. Wilmeth in the Darlington County Probate Court dated February 20, 2006 in the sum of \$150,010.00 which was filed in the Office of the Clerk of Court for Darlington County on February 20, 2006. Recorded as Judgment Roll Number 54640
27. Plaintiff's Ex. 8 to Transcript of March 9, 2017 Hearing: Assignment of Judgment Roll Number 54640 from the Estate of Margaret S. Goodson to Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, dated November 18, 2013 and filed on November 21, 2013
28. Plaintiff's Ex. 9 to Transcript of March 9, 2017 Hearing: Execution returned to Clerk of Court Nulla Bona, dated November 30, 2015 and filed with the Office of the Clerk of Court for Darlington County on December 22, 2015
29. Plaintiff's Ex.38 to Transcript of March 9, 2017 Hearing: Judgment against Harriet E. Wilmeth in favor of the Helen S. Goodson Trust, dated August 27, 2015, and recorded on September 2, 2015 as Judgment Roll Number 15-CP-16-686 in the sum of \$96,513.15 in the Criminal Case of the State of South Carolina vs. Harriet E. Wilmeth, as Case Number 09-GS-16-00690

30. Plaintiff's Ex.39 to Transcript of March 9 2017 Hearing: Assignment of Judgment Roll Number 15-CP-16-686 from the Estate of Helen S. Goodson to Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, dated November 18, 2013, and filed on November 21, 2013
31. Plaintiff's Ex. 43 to Transcript of March 9, 2017 Hearing: Darlington County Probate Order Approving Trust Agreement regarding the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, dated April 4, 2013, and recorded in the Office of the Probate Court for Darlington County on April 4, 2013
32. Final Order: Court of Common Pleas of Darlington County, South Carolina in the case of Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, vs. Harriet E. Wilmeth, et al, executed by Special Referee Carl A. Saleeby, dated April 6, 2017, and filed on April 7, 2017
33. Notice of Sale executed by Special Referee Carl A. Saleeby, dated April 6, 2017, and recorded on April 7, 2017.
34. Notice of Appeal filed by Appellant, Debra J. Freeman, dated April 8, 2017.


The Respondent, Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margaret S. Goodson and the Estate of Helen S. Goodson, attaches hereto its certification that this designation contains only matters material to the appeal of the Appellant, Debra J. Freeman.

Dated: June 15, 2017

Respectfully submitted,

STANTON LAW FIRM

By:



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Attorney for the Respondent, Thomas
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Beneficiaries Trust of the Estate of
Margaret S. Goodson and the Estate of
Helen S. Goodson

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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, Robert "B.W" Bizzell, William E. Bizzell,
Mary Lathan Steele, and Vicki Eaddy, Defendants.**

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

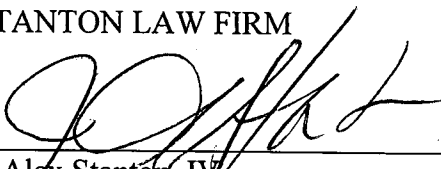
RESPONDENT'S CERTIFICATION

Pursuant to Appellate Rule 209, South Carolina Rules of Respondent Procedure,
Respondent's, Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate
of Margret S. Goodson and the Estate of Helen S. Goodson, counsel of record, J. Alex Stanton,
IV, certifies that the Designation of Matters to be Included in the Record on Appeal contains no
matter which is irrelevant to the appeal.

Dated: June 15, 2017

STANTON LAW FIRM

By:



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

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Respondent,

Thomas E. Goodson, as Trustee of the Residuary Beneficiaries Trust of the Estate of Margret S Goodson and the Estate of Helen S. Goodson, Designation of Record on Appeal and the Certification attached thereto, to be mailed, first-class postage prepaid to the following on this 15th day of June, 2017.

<p>Robert E. Lee, Esquire Robert E. Lee, LLC 111 Witcover Street P.O. Box 1096 Marion, SC 29571 <i>Counsel for the Appellant</i></p> <p>Brittany C. Moore, Esquire Kenneth R. Moss, Esquire Wright, Worley, Pope, Ekster & Moss, PLLC 618-A Sea Mountain Highway North Myrtle Beach, SC 29582 <i>Counsel for the Appellant</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>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>
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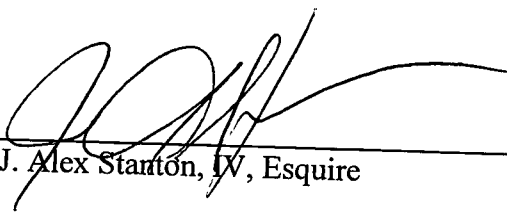
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