

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Ralph P. Stroman, Special Referee
Trial Court Case No. 2014-CP-26-04835

APPEAL FROM GEORGETOWN COUNTY
Ralph P. Stroman, Special Referee
Trial Court Case No. 2014-CP-22-00685

Appellate Case No. 2016-000329

RECEIVED

JUN 15 2017

SC Court of Appeals

First Citizens Bank and Trust Company, Inc.,.....Respondent,

v.

Beck Holding Company, LLC, C.J.B Holding & Trust
Company, LLC, Cornelius J. Beck, Jr., Andrews Dental
Center, Inc., Inlet Dental Center, Inc., Seaside Surgical,
Inc., Georgetown Dental Center of South Carolina, Inc.
And South Beach Dental Center, Inc.,..... Defendants,

Of whom Cornelius J. Beck, Jr. is the.....Appellant.

COUNTER DESIGNATION OF MATTER TO
BE INCLUDED IN THE RECORD ON APPEAL

In addition to the designations of Appellant, Respondent proposes the following to
be included in the Record on Appeal:

1. Special Referee’s Report and Judgment of Foreclosure and Sale, entered on March 26, 2015;
2. Special Referee’s Report and Judgment of Foreclosure and Sale, entered on March 31, 2015;
3. Horry County Special Referee Order, filed February 11, 2016;
4. Georgetown County Special Referee Order, filed February 12, 2016;
5. January 28, 2016 Transcript;

6. Appellant's Motion to Vacate Judgment and Sale, filed July 13, 2015, in Georgetown County;
7. Appellant's Notice of Third Party Intervention to Settle Judgment, filed September 1, 2015, in Georgetown County;
8. Appellant's Motion to Vacate Judgment and Sale, filed July 8, 2015 in Horry County;
9. Appellant's Notice of Third Party Intervention to Settle Judgment, filed August 17, 2015, in Horry County;
10. Appellant's Objection to Motion to Strike Filings Scheduled for 1/28/16, filed January 26, 2016, in Georgetown County;
11. Appellant's Notice of Citizenship, filed January 26, 2016, in Georgetown County;
12. Appellant's Judicial Notice, filed January 26, 2016, in Georgetown County;
13. Appellant's Affidavit of Facts Concerning American Citizen, filed January 26, 2016, in Georgetown County;
14. Appellant's Objection to Motion to Strike Filings Scheduled for 1/28/16, filed January 26, 2016, in Horry County;
15. Appellant's Notice of Citizenship, filed January 26, 2016, in Horry County;
16. Appellant's Judicial Notice, filed January 26, 2016, in Horry County;
17. Appellant's Affidavit of Facts Concerning American Citizen, filed January 26, 2016, in Horry County;
18. Letter to Appellant dated April 7, 2015, enclosing Notices of Sale; and
19. United States Bankruptcy Court Filing, dated May 27, 2015.

Respondent certifies that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



Robert A. Kerr, Jr. (S.C. Bar. No. 11981)
Lesley A. Firestone (S.C. Bar No. 100080)
MOORE & VAN ALLEN, P.L.L.C.
78 Wentworth Street
Charleston, SC 29401
(843) 579-7000

June 13, 2017

Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Ralph P. Stroman, Special Referee
Trial Court Case No. 2014-CP-26-04835

APPEAL FROM GEORGETOWN COUNTY
Ralph P. Stroman, Special Referee
Trial Court Case No. 2014-CP-22-00685

Appellate Case No. 2016-000329

RECEIVED

JUN 15 2017

SC Court of Appeals

First Citizens Bank and Trust Company, Inc.,.....Respondent,

v.

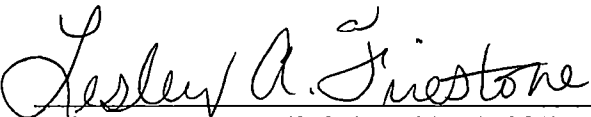
Beck Holding Company, LLC, C.J.B Holding & Trust
Company, LLC, Cornelius J. Beck, Jr., Andrews Dental
Center, Inc., Inlet Dental Center, Inc., Seaside Surgical,
Inc., Georgetown Dental Center of South Carolina, Inc.
And South Beach Dental Center, Inc.,..... Defendants,

Of whom Cornelius J. Beck, Jr. is the.....Appellant.

PROOF OF SERVICE

This is to certify that I have this day served the Appellant in the foregoing matter with a copy of the foregoing **INITIAL BRIEF OF RESPONDENT** and **COUNTER DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Cornelius J. Beck, Jr.
34 Old Evergreen Lane
Pawley's Island, SC 29585


Robert A. Keir, Jr. (S.C. Bar. No. 11981)

Lesley A. Firestone (S.C. Bar No. 100080)

MOORE & VAN ALLEN, P.L.L.C.

78 Wentworth Street

Charleston, SC 29401

(843) 579-7000

Attorneys for Respondent

June 13, 2017

Moore&VanAllen

June 13, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Lesley A. Firestone
Attorney at Law

T 843 579 7027
F 843 579 8720
lesleyfirestone@mvalaw.com

Moore & Van Allen PLLC

78 Wentworth St.
Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

**RE: First Citizens Bank and Trust Co., Inc., Respondent
Cornelius J. Beck, Jr., Appellant
Appellate Case No. 2016-000329**

RECEIVED

JUN 15 2017

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing, please find an original and one copy of the following:

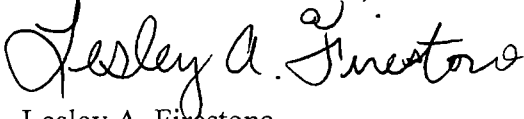
1. **Respondent's Initial Brief;**
2. **Respondent's Counter Designation of Matter to be Included in the Record on Appeal;** and
3. **Proof of Service.**

Please return a filed copy of each to this office in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this matter and please call me with any questions.

Yours very truly,

MOORE & VAN ALLEN, PLLC



Lesley A. Firestone

LAF/wss

Enclosures

cc (w/encl.): Cornelius J. Beck, Jr.



Hasler

016H26512680

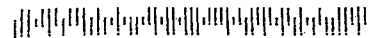
\$02.200

Mailed From 29401
US POSTAGE

Moore & Van Allen

Moore & Van Allen PLLC
78 Wentworth Street
Post Office Box 22828
Charleston, SC 29413-2828

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211



8669/36442.80

RECEIVED
JUN 11 2011
SC COURT OF APPEALS