

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

Steven C. Kirven, Master-In-Equity

Appellate Case No.: 2017-000886

**RECEIVED**

JUL 17 2017

SC Court of Appeals

Federal National Mortgage Association.....Respondent,

v.

John D. Dalen, Julie A. Dalen and Wawtockace Hills Property Owners  
Association.....Defendants,

Of whom

John D. Dalen and Julie A. Dalen, are.....Appellants.

v.

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

**RESPONDENT FEDERAL NATIONAL MORTGAGE ASSOCIATION'S  
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON  
APPEAL**

Respondent Federal National Mortgage Association proposes the following be  
included in the Record on Appeal:


1. Lis Pendens, Summons and Complaint filed October 31, 2011;
2. Defendant' Answer, Affirmative Defenses, Counterclaim, and Demand for Jury Trial filed February 21, 2012;
3. Reply to Defendant' Answer, Affirmative Defenses, Counterclaim, and Demand for Jury Trial filed March 26, 2012;
4. Notice of Motion for Summary Judgment and Memorandum of Law with Exhibits filed December 4, 2013;

5. Order Denying Plaintiff's Motion for Summary Judgment filed July 9, 2014;
6. Motion by Defendant's Dalen for Summary Judgment on Plaintiff's Complaint of Foreclosure filed November 17, 2014;
7. Motion to Strike Jury Trial Demand and Refer to the Master in Equity filed November 17, 2017;
8. Form 4 Order filed January 28, 2015;
9. Order filed February 25, 2015;
10. Order filed May 15, 2015;
11. Motion to Substitute filed June 1, 2015;
12. Order filed September 23, 2015;
13. Counterclaim Defendant's Renewed Motion for Summary Judgment as to Counterclaim Plaintiffs John D. Dalen and Julie A. Dalen filed March 9, 2016;
14. Counterclaims Defendant's Memorandum of Law in Support of its Renewed Summary Judgment Motion filed March 21, 2016;
15. Notice of Demand and Motion to Dismiss for Lack of Subject Matter Jurisdiction filed May 5, 2016;
16. Order Granting Counterclaim Defendant's Renewed Motion for Summary Judgment filed July 28, 2016;
17. Defendant and Counterclaim Plaintiff's Notice of Motion and Motion for Reconsideration of Order Granting Counterclaim Defendant's Motion for Summary Judgment filed August 8, 2016;
18. Order Relieving William H. Sloan as Counsel for Dalens filed August 11, 2016;
19. Order Denying Motion to Dismiss filed October 13, 2016;
20. Order Denying Motion for Reconsideration filed October 13, 2016;
21. Transcript from March 2, 2017 Trial, including Exhibits 1 to 7;
22. Judgment of Foreclosure and Sale filed March 6, 2017;
23. Objection and Notice of Motion, and Motion for a New Trial and/or Amendment of Judgment on Grounds of Fraud and Denial of Due Process of Law filed March 15, 2017;
24. Order filed March 17, 2017;

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

July 17, 2017



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Charles S. Gwynne Jr. (SC Bar # 73844)

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Attorney for the Respondent Federal

National Mortgage Association

Rogers Townsend & Thomas, PC and its staff are debt collectors

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Of whom

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v.

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

**PROOF OF SERVICE**

I HEREBY CERTIFY that I have served the **RESPONDENT FEDERAL NATIONAL MORTGAGE ASSOCIATION'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** on Appellants and other parties by depositing copies of it in the United States Mail, postage prepaid, on July 17, 2017, addressed to the parties of record shown on the attachment listing Other Parties and Counsel of Record.



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Attorney for the Respondent Federal  
National Mortgage Association

Other Parties and Counsel of Record:

John D. Dalen  
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Westminster, SC 29693  
Pro Se Appellant

Julie A. Dalen  
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Westminster, SC 29693  
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LICENSED IN SOUTH CAROLINA



July 17, 2017

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals Clerk of Court  
1015 Sumter Street  
Columbia, South Carolina 29201

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JUL 17 2017

**SC Court of Appeals**

RE: Federal National Mortgage Association v. John D. Dalen, Julie A. Dalen and Wawtockace Hills Property Owners Association and John D. Dalen and Julie A. Dalen Bank of America, N.A. successor by merger to BAC Home Loans Servicing, L.P. f/k/a Countrywide Home Loans Servicing, L.P.,  
Our file: 515262.1894  
**Appellate Case No. 2017-000886**

Dear Ms. Kitchings:

Enclosed are the original and one copy of the Initial Brief of Respondent Federal National Mortgage Association and the original and one copy of Respondent Federal National Mortgage Association's Designation of Matter to be Included in the Record on Appeal, along with a Proofs of Service. Please return a filed copy of the documents to me.

By copy of this letter, I am serving a copy of the Initial Brief of Respondent Federal National Mortgage Association and Respondent Federal National Mortgage Association's Designation of Matter to be Included in the Record on Appeal and Proof of Service on all parties to this appeal.

Thank you for your assistance in this matter.

With kind personal regards, I am

Sincerely yours,

A handwritten signature in black ink, appearing to read "CSG", is written over the typed name.

Charles S. Gwynne Jr.

/ow

Enclosures as stated

cc:

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Westminster, SC 29693

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