

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM LEE COUNTY
Common Pleas

AUG 16 2017

Clifton Newman, Circuit Court Judge

SC Court of Appeals

Case No. 2013-CP-31-00321

Laura Toney,

Appellant

LaSalle Bank National Association as Trustee
for the Registered Holder of Structured Asset
Securities Corporation, Structured Asset
Investment Loan Trust, Mortgage Pass-Through
Certificates, Series 2004-11, Altisource Homes,
Pro Capital Investors, Wayne Capell, Lee County
Treasurer and Lee County Planning and Zoning,

Respondents

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL

Respondent County proposes the following items be included in the Record
on Appeal:

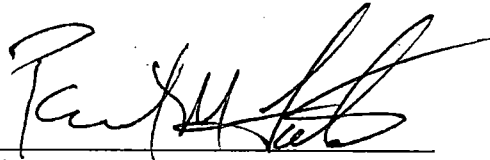
- (1) Appellant's Complaint 2013-CP-31-032;
- (2) Respondent County's Rule 12(b)(6) Motion;
- (3) Respondent County's Motion for Summary Judgment;
- (4) Transcript of November 30, 2015;
- (5) Order denying Appellate's Motion to Disqualify Attorneys Fata and
O'Connor dated January 25, 2016;
- (6) Transcript of March 30, 2016.
- (7) Order granting Summary Judgment to Respondent County dated July

11, 2016

(8) Letter of Caution from Christopher G. Isgett, Chair, The Supreme Court of South Carolina Commission on Lawyer Conduct to Paul M. Fata dated June 20, 2016;

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

August 14, 2017



Paul M. Fata, Esq. SC Bar #001966
Stuckey, Fata & Segars, LLC
P. O. Drawer 568
Bishopville, SC 29010
803 484-5409
Attorney for Respondents,
Wayne Capell, Lee County
Treasurer and Lee County
Planning and Zoning

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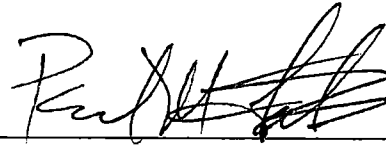
Respondents

PROOF OF SERVICE OF RESPONDENTS' WAYNE CAPELL, LEE COUNTY
TREASURER AND LEE COUNTY PLANNING AND ZONING'S INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL

I hereby certify that I have served the Respondents' Wayne Capell, Lee
County Treasurer and Lee County Planning and Zoning's Initial Brief and
Designation of Matter to be Included in the Record on Appeal addressed to the
Appellate-Post Office Box 722, Bishopville, South Carolina 29010 and on Sean
O'Connor, attorney for Respondent LaSalle Bank National Association by depositing
a copy of same in the United States Mail, postage prepaid, on August 14, 2017,

(Signature to Follow on Next Page)

August 14, 2017



Paul M. Fata, Esq. SC Bar #001966
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August 14, 2017

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
AUG 16 2017
SC Court of Appeals

RE: Laura Toney vs. LaSalle Bank National Association, et al
Appellate Case No.: 2016-001989
Case No: 2013-CP-31-00321

Dear Ms. Kitchings:

Please find enclosed herewith the original and one (1) copy of *Respondents Wayne Capell, Lee County Treasurer and Lee County Planning and Zoning's Initial Brief and Designation of Matter to be Included in the Record of Appeal* along with the *Proof of Service* regarding the above captioned matter. Please file same and return a filed copy to our office using the enclosed prepaid envelope. Copies of same have been served on the Appellant and Sean O'Connor, Esq. both of whom are also copied on this letter.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

With kind regards, I remain,

Yours very truly,

STUCKEY, FATA & SEGARS, LLC


PAUL M. FATA

PMF:boh
Enclosures
Cc: Ms. Laura Toney, pro se Appellant (w/encl.)
Sean A. O'Connor, Esq. (w/encl.)

Stuckey, Fata & Segars, LLC
Post Office Drawer 568
Bishopville, South Carolina 29010

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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