

STATE OF SOUTH CAROLINA

COUNTY OF PICKENS

The Secretary of Veteran Affairs, an Officer of  
the United States of America,

PETITIONER,

JPMorgan Chase Bank, National Association,

PLAINTIFF,

VS.

Noah Daniel Crowder, and Melissa Crowder,

DEFENDANT(S).

(140268.01368W)

IN THE COURT OF COMMON PLEAS

CASE NO. 2013-CP-39-00519

WRIT OF ASSISTANCE

CLERK OF COURT  
PICKENS COUNTY  
2018 JUN - 1 11 31

**THIS WRIT OF ASSISTANCE APPLIES TO ALL OCCUPANTS AND OTHERS (including their possessions) WITH RESPECT TO THE PROPERTY DESCRIBED BELOW.**

This matter came before me regarding the above named Defendant(s) Noah Daniel Crowder and Melissa Crowder or any occupant of the property located at 116 Raintree Court, Easley, SC 29642, to issue a Writ of Assistance by this Court to the Sheriff of Pickens County, South Carolina, ordering and directing him to remove, peaceably or forcibly, the Defendant(s) Noah Daniel Crowder and Melissa Crowder, together with any and all persons claiming under and through said Defendants, and this Writ of Assistance specifically and further authorizing the removal of all of their personal property, no matter the type, kind, or value, which is located within or on the subject premises described herein; and said judicial authorization herein shall be accomplished with the removal of said personal property to the curb.

It appears that the subject premises were sold by judicial sale held on June 1, 2015. As a result of said sale, the Petitioner became the owner of the subject property by virtue of a Special Referee's Deed filed in Book 1707, page 282 in the Office of the Register of Deeds for Pickens County. Therefore, Petitioner is entitled to possession of the subject premises.

NOW, THEREFORE,

UPON MOTION OF Scott and Corley, P.A., attorney for Petitioner,

IT IS HEREBY ORDERED that the Petitioner is entitled to recover possession of the below described property.

All that certain piece, parcel or lot of land, lying and being situate in the State of South Carolina, County of Pickens, in the City of Easley, being shown and designated as Lot No. 6 of Meadowcrest Subdivision, as shown on subdivision plat prepared by Robert R. Spearman, RLS #3615, dated March 3, 2000 and recorded in Plat Book 429 at Pages 7 and 8 in the office of the Register of Deeds for Pickens County, South Carolina, reference to which is hereby made for a more complete and accurate description.

This being the same property conveyed to Noah Daniel Crowder and Melissa Crowder by deed of Hamilton Scott Reeves, Jr. recorded September 24, 2007 in Deed Book 1136 at Page 101.

RECEIVED

JUL 23 2018

SC Court of Appeals


TMS No. 5038-19-61-4448

Property address: 116 Raintree Court, Easley, SC 29642

IT IS FURTHER ORDERED that, upon service of a copy of this Order, the Sheriff of Pickens County, South Carolina or his authorized deputies be, and they hereby are, directed and authorized to post a copy of this Order, and/or serve a copy of this Order upon the occupant(s) of the referenced property.

ORDERED, ADJUDGED AND DECREED that the Sheriff of Pickens County is herein and hereby ordered and directed to, with whatever force necessary, eject and remove from the premises the occupants and their personal possessions from the real property located at **116 Raintree Court, Easley, SC 29642** with the individuals occupying the property to be removed by June 30, 2018.

IT IS SO ORDERED

  
Daniel E. Hunt  
Special Referee for Pickens County

Easley, South Carolina  
\_\_\_\_\_, 2018

CLERK OF COURT  
PICKENS COUNTY  
EASLEY, SOUTH CAROLINA

2018 JUN -1 P 4:39

STATE OF SOUTH CAROLINA

COUNTY OF PICKENS

The Secretary of Veteran Affairs, an Officer of the United States of America,

PETITIONER,

JPMorgan Chase Bank, National Association,

PLAINTIFF,

VS.

Noah Daniel Crowder, and Melissa Crowder,

DEFENDANT(S).

(140268.01368W)

IN THE COURT OF COMMON PLEAS

CASE NO. 2013-CP-39-00519

PETITION FOR WRIT OF ASSISTANCE


CLERK OF COURT  
SCOTT AND CORLEY, P.A.  
2018 JUN - 1 P 4:39

The Plaintiff/Petitioner herein, The Secretary of Veteran Affairs, an Officer of the United States of America, would respectfully show unto the Court as follows:

1. That this is an action for foreclosure of a mortgage of real property located in Pickens County, South Carolina and designated as **116 Raintree Court, Easley, SC 29642**.
2. That pursuant to the Motion and Supplemental Order to the Special Referee's Order and Judgment of Foreclosure and Sale filed herein on April 2, 2015, the subject property was sold at judicial sale.
3. That the Petitioner was the successful bidder at the judicial foreclosure sale.
4. That the Special Referee for Pickens County executed a judicial deed conveying title of the subject property to The Secretary of Veteran Affairs, an Officer of the United States of America.
5. That as of the date of filing of this petition, the subject property continues to be occupied by said Defendant or other occupants.

WHEREFORE, the Petitioner/Plaintiff pray that the Writ of Assistance requested herein be granted, and that the Special Referee issue an Order requiring the Sheriff of Pickens County to commence eviction of the Defendant and/or any other occupants from the subject property, and to remove all personal property therein.

SCOTT AND CORLEY, P.A.

By:   
 Ronald C. Scott (ronsc@scottandcorley.com), SC Bar #4996  
 Reginald P. Corley (reggiec@scottandcorley.com), SC Bar #69453  
 Angelia J. Grant (angig@scottandcorley.com), SC Bar #78334  
 Jessica S. Corley (jessicac@scottandcorley.com), SC Bar #80470  
 Allison E. Heffernan (alisonh@scottandcorley.com), SC Bar #68530  
 Matthew E. Rupert (matthewr@scottandcorley.com), SC Bar #100740  
 Wilkam P. Stork (williams@scottandcorley.com), SC Bar #100242  
 Louise M. Johnson (ceasie@scottandcorley.com), SC Bar #16586  
 Tasha B. Thompson (tashat@scottandcorley.com), SC Bar #76415  
 H. Guyton Murrell (guytonm@scottandcorley.com), SC Bar #54134  
 ATTORNEYS FOR THE PETITIONER  
 2712 Middleburg Drive, Suite 200  
 Columbia, SC 29204  
 803-252-3340

**RECEIVED**  
 JUL 23 2018  
 SC Court of Appeals

STATE OF SOUTH CAROLINA  
COUNTY OF PICKENS

IN THE COURT OF COMMON PLEAS  
CASE NO. 2013-CP-39-00519

The Secretary of Veteran Affairs, an Officer of the United States of America,  
PETITIONER,

JPMorgan Chase Bank, National Association,  
PLAINTIFF,

MOTION AND ORDER INFORMATION FORM  
AND COVER SHEET

VS.

Noah Daniel Crowder, and Melissa Crowder,

DEFENDANT(S).

**SUBMITTING PARTY: PETITIONER**

Name, SC Bar No. and Address of Petitioner Attorney

Name, SC Bar No. and Address of Defendant's Attorney

Ronald C. Scott, SC Bar #4996  
Reginald P. Corley, SC Bar #69453  
Angelia J. Grant, SC Bar #78334  
Jessica S. Corley, SC Bar #80470  
Allison E. Heffernan, SC Bar #68530

Matthew E. Rupert, SC Bar #100740  
William P. Stork, SC Bar #100242  
Louise M. Johnson, SC Bar #16586  
Taasha B. Thompson, SC Bar #76415  
H. Guyton Murrell, SC Bar #64134

ATTORNEYS FOR PETITIONER  
2712 Middleburg Drive, Suite 200  
(P.O. Box 2065)  
Columbia, SC 29204 (29202)  
Telephone: (803) 252-3340  
Fax: (855) 601-4921

Email: rons@scottandcorley.com  
allisonh@scottandcorley.com  
tashat@scottandcorley.com

reggiec@scottandcorley.com  
matthewr@scottandcorley.com  
guytonm@scottandcorley.com

angig@scottandcorley.com  
williams@scottandcorley.com

jessica@scottandcorley.com  
ceasia@scottandcorley.com

- MOTION HEARING REQUESTED (attach written motion and complete Sections I and III)
- FORM MOTION, NO HEARING REQUESTED (Complete Sections II and III)
- PROPOSED ORDER/CONSENT ORDER (Complete Sections II and III)

**SECTION I: HEARING INFORMATION**

Nature of Motion: \_\_\_\_\_ Court Reporter Needed: Yes/No  
Estimated Time Needed: \_\_\_\_\_

**SECTION II: MOTION TYPE**

- Written Motion attached
- Form Motion - I hereby move for relief of action by the court as set forth in the attached proposed order.

*Taasha B. Thompson*  
Signature of Attorney for Plaintiff/Petitioner

5/23 2018  
Date Submitted

**SECTION III: MOTION FEE**

- PAID - AMOUNT: \$25.00
- EXEMPT: \_\_\_\_\_ Rule to Show Cause in Child or Spousal Support
- \_\_\_\_\_ Domestic Abuse or Abuse and Neglect
- \_\_\_\_\_ Indigent Status
- \_\_\_\_\_ Sexually Violent Predator Act
- \_\_\_\_\_ Motion for Stay in Bankruptcy
- \_\_\_\_\_ Motion for Publication
- \_\_\_\_\_ Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions
- \_\_\_\_\_ Name of Court Reporter: \_\_\_\_\_
- \_\_\_\_\_ Other
- \_\_\_\_\_ Stage Agency v. Indigent Party
- \_\_\_\_\_ Post-Conviction Relief
- \_\_\_\_\_ Motion for Execution (Rule 69, SCRCP)

**JUDGE'S SECTION**

Motion Fee to be paid upon filing of the attached order. JUDGE CODE: \_\_\_\_\_ DATE: \_\_\_\_\_  
 Other

\_\_\_\_\_  
Judge Signature

**CLERK'S VERIFICATION**

Collected by: MB DATE FILED: \_\_\_\_\_

MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED - AMOUNT DUE: \$ 25.00 # 157388

CLERK OF COURT  
2018 JUN - 1 PM 3:39


TMS No. 5038-19-61-4448

Property address: 116 Raintree Court, Easley, SC 29642

IT IS FURTHER ORDERED that, upon service of a copy of this Order, the Sheriff of Pickens County, South Carolina or his authorized deputies be, and they hereby are, directed and authorized to post a copy of this Order, and/or serve a copy of this Order upon the occupant(s) of the referenced property.

ORDERED, ADJUDGED AND DECREED that the Sheriff of Pickens County is herein and hereby ordered and directed to, with whatever force necessary, eject and remove from the premises the occupants and their personal possessions from the real property located at **116 Raintree Court, Easley, SC 29642** with the individuals occupying the property to be removed by June 30, 2018.

IT IS SO ORDERED

  
Daniel E. Hunt  
Special Referee for Pickens County

Easley, South Carolina  
\_\_\_\_\_, 2018

CLERK OF COURT  
PICKENS COUNTY  
EASLEY, SOUTH CAROLINA

2018 JUN - 1 P 4:39

STATE OF SOUTH CAROLINA

COUNTY OF PICKENS

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VS.

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PETITION FOR WRIT OF ASSISTANCE

CLERK OF COURT  
SOUTH CAROLINA

2018 JUN - 1 P 4: 39

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WHEREFORE, the Petitioner/Plaintiff pray that the Writ of Assistance requested herein be granted, and that the Special Referee issue an Order requiring the Sheriff of Pickens County to commence eviction of the Defendant and/or any other occupants from the subject property, and to remove all personal property therein.

SCOTT AND CORLEY, P.A.

By: 

Ronald C. Scott (rons@scottandcorley.com), SC Bar #4996  
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ATTORNEYS FOR THE PETITIONER

2712 Middleburg Drive, Suite 200  
Columbia, SC 29204  
803-252-3340

STATE OF SOUTH CAROLINA  
COUNTY OF PICKENS

IN THE COURT OF COMMON PLEAS  
CASE NO. 2013-CP-39-00519

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JPMorgan Chase Bank, National Association,  
PLAINTIFF,

MOTION AND ORDER INFORMATION FORM  
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Name, SC Bar No. and Address of Defendant's Attorney

Ronald C. Scott, SC Bar #4996  
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guytonm@scottandcorley.com

angig@scottandcorley.com  
williams@scottandcorley.com

jessica@scottandcorley.com  
ceasia@scottandcorley.com

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- FORM MOTION, NO HEARING REQUESTED (Complete Sections II and III)
- PROPOSED ORDER/CONSENT ORDER (Complete Sections II and III)

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Estimated Time Needed: \_\_\_\_\_

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*Tasha B. Thompson*  
Signature of Attorney for Plaintiff/Petitioner

5/23 2018  
Date Submitted

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- PAID - AMOUNT: \$25.00
- EXEMPT:
  - Rule to Show Cause in Child or Spousal Support
  - Domestic Abuse or Abuse and Neglect
  - Indigent Status
  - Sexually Violent Predator Act
  - Motion for Stay in Bankruptcy
  - Motion for Publication
  - Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions
- Name of Court Reporter: \_\_\_\_\_
- Other \_\_\_\_\_

**JUDGE'S SECTION**

Motion Fee to be paid upon filing of the attached order. JUDGE CODE: \_\_\_\_\_ DATE: \_\_\_\_\_  
 Other \_\_\_\_\_

\_\_\_\_\_  
Judge Signature

**CLERK'S VERIFICATION**

Collected by: MB DATE FILED: \_\_\_\_\_

MOTION FEE COLLECTED: \$ 25.00  
 CONTESTED - AMOUNT DUE: \$ 157388

2018 JUN - 1 PM 39  
CLERK OF COURT  
SOUTH CAROLINA  
COURT REPORTERS

## Certificate of Electronic Notification

### Recipients

**Sarah Nielsen** - Notification transmitted on 06-18-2018 01:35:51 PM.

**Daniel Hunt** - Notification transmitted on 06-18-2018 01:35:51 PM.

**William Koehler** - Notification transmitted on 06-18-2018 01:35:52 PM.

**Kevin Brown** - Notification transmitted on 06-18-2018 01:35:51 PM.

**Robert Ray** - Notification transmitted on 06-18-2018 01:35:52 PM.

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2013CP3900519

Official File Stamp: 06-18-2018 01:35:21 PM

Court: CIRCUIT COURT

Common Pleas

Pickens

Case Caption: Jpmorgan Chase Bank VS Noah Daniel Crowder  
, defendant, et al

Event(s):

Notice/Notice of Appearance

Document(s) Submitted: Service/Affidavit Of Service

Filed by or on behalf of: Tasha B. Thompson

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Kevin Ted Brown for Jpmorgan Chase Bank

Robert Charles Ray for Noah Daniel Crowder et  
al

Daniel E. Hunt

William S. Koehler for Jpmorgan Chase Bank

Sarah Beth Nielsen for Jpmorgan Chase Bank

The following people have not been served electronically by the Court. Therefore, they must  
be served by traditional means:

STATE OF SOUTH CAROLINA	)	
	)	IN THE COURT OF COMMON PLEAS
COUNTY OF PICKENS	)	THIRTEENTH JUDICIAL CIRCUIT
JPMorgan Chase Bank, N.A.,	)	Civil Action No. 2013-39-03
	)	
Plaintiff,	)	
	)	
vs.	)	<b>ORDER</b>
	)	
Noah Daniel Crowder and Melissa Crowder,	)	
	)	
Defendants.	)	

2018 FEB 21 P 2:38  
 CLERK OF COURT  
 THIRTEENTH JUDICIAL CIRCUIT  
 PICKENS COUNTY  
 SOUTH CAROLINA

**BEFORE THE COURT** is Defendants Noah Daniel Crowder and Melissa Crowder's ("Defendants") Motion for Relief and to Stay Final Judgment and Emergency Motion for Temporary Restraining Order, both filed on January 20, 2016. Plaintiff JPMorgan Chase Bank, N.A. ("Plaintiff") filed a Memorandum in Opposition to the Motions on October 5, 2016.

*Handwritten initials and mark:*  
 MB  
 #1

A hearing was held on October 6, 2016, with Robert C. Ray, Esquire appearing for the Defendants and Sarah B. Nielsen, Esquire appearing for Plaintiff. During the hearing, Defendant Noah D. Crowder appeared and offered testimony. Defendant Melissa Crowder did not appear and did not testify. Following the hearing, the Court requested additional briefing from Plaintiff. Plaintiff provided a supplemental brief on November 7, 2016, and a second supplemental brief on December 22, 2017. A supplemental hearing was noticed for February 7, 2018, and notice was served on counsel of record. Present at the supplemental hearing was Sarah B. Nielsen, Esquire for Plaintiff. Defendants did not appear at the supplemental hearing.

**RECEIVED**  
 JUL 23 2018  
 SC Court of Appeals

*AK*  
*#3*

Having considered the submissions of the parties, the affidavits of record, the testimony of Defendant Noah D. Crowder, the South Carolina Rules of Civil Procedure, applicable case law, and the arguments of counsel, the Court finds that Defendants have not met their burden to set aside the judgment and sale and, therefore, the undersigned **DENIES** the Motion for Relief and to Stay Final Judgment in its entirety. Between the filing of the Motions on January 20, 2016, and the case was voluntarily stayed while the Court considered the motions of Defendants and, therefore, the Motion for Temporary Restraining Order is **DENIED** as moot.

IT IS SO ORDERED this 14 day of February 2018.

*Daniel E. Hunt*  
The Honorable Daniel E. Hunt Special Referee

CLERK OF COURT  
SPRINGFIELD COUNTY  
SOUTH CAROLINA

2018 FEB 21 P 2:38

STATE OF SOUTH CAROLINA )  
COUNTY OF PICKENS )

IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

JPMorgan Chase Bank, N.A., )  
Plaintiff, )

Civil Action No. 2013-CP-39-0519

vs. )

**CERTIFICATE OF SERVICE**

Noah Daniel Crowder and Melissa Crowder, )  
Defendants. )

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for JPMorgan Chase Bank, NA., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Order signed by The Honorable Daniel E. Hunt, Special Referee

Counsel Served: Robert C. Ray, Esq.  
Robert C. Ray & Associates  
306 A Mills Avenue  
Greenville, SC 29605

Kevin T. Brown, Esq.  
Rogers Townsend & Thomas, PC  
P.O. Box 100200  
Columbia, SC 29202

Vance I. Brabham, III, Esq.  
Scott and Corley, P.A.  
P.O. Box 2065  
Columbia, SC 29202



Kim R. Smith  
Administrative Assistant

February 20, 2018

2018 FEB 21 P 2:38  
CLERK OF COURT  
THIRTEENTH JUDICIAL CIRCUIT  
COMMON PLEAS



**NELSON MULLINS**

2018 FEB 27 P 2:38

Sarah B. Nielsen  
T 803.255.9284 F 803.255.5943  
sarah.nielsen@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

1320 Main Street | 17th Floor  
Columbia, SC 29201  
T 803.799.2000 F 803.255.7500  
nelsonmullins.com

CLERK OF COURT  
PICKENS COUNTY  
SOUTH CAROLINA

February 20, 2018

The Honorable Pat Welborn  
Clerk of Court  
Pickens County Courthouse  
Post Office Box 215  
Pickens, SC 29671-0215

RE: JPMorgan Chase Bank, NA v. Noah Daniel Crowder, et al.  
Civil Action No. 2013.cp.39.0519  
Our File No. 11281/02233

Dear Mr. Welborn:

Enclosed are the original and one copy of an Order signed by The Honorable Daniel E. Hunt, Special Referee, in the above-referenced matter. We would appreciate it if you would file the original document and return a clocked in copy to us in the envelope provided.

Very truly yours,

Sarah B. Nielsen

SBN:krs  
Enclosures

cc: Robert C. Ray, Esq.  
Kevin T. Brown, Esq.  
Vance L. Brabham, III, Esq.

**RECEIVED**  
JUL 23 2018  
SC Court of Appeals