

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

The Honorable Lisa Lee Smith  
Special Referee

Appellate Case No. 2018-001611  
Circuit Court Case No. 2011-CP-32-03945

RECEIVED  
NOV 14 2018  
SC Court of Appeals

Wells Fargo Bank, N.A., Ultimate Successor to First Union  
National Bank, ..... Respondent,

v.

Albert J. Sanders, Jr.; AJS Properties, LLC; Branch Banking and  
Trust Company, Ultimate Successor to Southern National Bank of  
South Carolina; First Palmetto Savings Bank, FSB, ..... Defendants,

of which

Albert J. Sanders, Jr., and AJS Properties, LLC, are the ..... Appellants.

RESPONDENT'S DESIGNATION OF MATTER

Respondent designates the following to be included in the Record on Appeal:

**Orders**

1. Special Referee's Order and Judgment of Foreclosure and Sale (May 8, 2018).
2. Order of Reference (August 31, 2015).

**Pleadings**

3. Wells Fargo's Summons, Complaint, and all accompanying notices and exhibits (Oct. 18, 2011).
4. Mr. Sanders's Answer (Nov. 18, 2011).

**Transcripts**

5. Transcript of Mach 15, 2018 Trial

**Trial Exhibits**

6. Wells Fargo Trial Exhibit 1: Negotiable Promissory Note
7. Wells Fargo Trial Exhibit 2: Mortgage
8. Wells Fargo Trial Exhibit 3: Notices of Bank Mergers
9. Wells Fargo Trial Exhibit 4: Notices of Intention to Foreclose
10. Wells Fargo Trial Exhibit 5: Notice of Right to Cure Default
11. Wells Fargo Trial Exhibit 6: Transaction Statement
12. Wells Fargo Trial Exhibit 7: Summary of Debt Owed and Accompanying Documents
13. Wells Fargo Trial Exhibit 8: Tax Notices and Accompanying Documents
14. Wells Fargo Trial Exhibit 9: Payment Extension Agreement
15. Wells Fargo Trial Exhibit 10: Affidavit of Attorney's Fees

**Other Materials**

16. Wells Fargo's Certificate of Compliance with South Carolina Supreme Court Order No. 2011-05-02-1 (August 6, 2013).
17. Affidavit of Verified Statement of Account (Sept. 2, 2015).
18. Notice of Appeal.

The below-signed certifies that this Designation contains no matter which is irrelevant to this appeal.

*Signature Page Attached*

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By:   
\_\_\_\_\_

S. Sterling Laney, III  
S.C. Bar No. 6933  
550 South Main Street, Suite 400  
Greenville, South Carolina 29601  
(864) 255-5400  
*sterling.laney@wbd-us.com*

M. Todd Carroll  
S.C. Bar No. 74000  
1221 Main Street, Suite 1600  
Columbia, South Carolina 29201  
(803) 454-6504  
*todd.carroll@wbd-us.com*

Attorneys for Respondent

November 13, 2018

---

PROOF OF SERVICE

---

I, the undersigned Office Manager of the law offices of Womble Bond Dickinson (US) LLP, Attorneys for Respondent, do hereby certify that I have served the below parties in this action with a copy of the pleading(s) specified below by mailing a copy of the same, postage prepaid, to the following address(es):

Pleading: Respondent's Designation of Matter

Parties Served: W. Wesley Johnson, Jr.  
1031 Center Street  
West Columbia, South Carolina 29169  
*Attorney for Appellant*

  
Deborah L. Johnson

November 13, 2018