

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
The Honorable Joseph M. Strickland, Master in Equity

Case Nos. 2011-CP-40-6317 and 2011-CP-40-6318  
Appellate Case No. 2018-000251

**RECEIVED**  
DEC 04 2018  
SC Court of Appeals

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South State Bank.....Respondent,

v.

Sand Dollar 31, LLC; and Rhonda Meisner ..... Defendants,

Of whom Rhonda Meisner is the .....Appellant.

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**DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD OF APPEAL**

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Respondent South State Bank proposes the following records from both civil actions #  
2011-CP-40-6317 and 2011-CP-40-6318 to be included in the Record on Appeal:

1. Complaint filed on September 22, 2011.
2. Amended Complaint filed on September 27, 2012
3. Answer and Counterclaim filed on January 19, 2012.
4. Reply filed February 21, 2012.
5. Order of Reference entered on January 25, 2012.
6. Transcript of foreclosure hearing on April 25, 2012.
7. Judgment of Foreclosure and Sale entered on May 16, 2012.
8. Form 4 Judgment entered on May 16, 2012.

9. Master's Report on Sale and Disbursements and Order of Confirmation entered on August 8, 2012.
10. Motion to Alter or Amend pursuant to Rules 52, 59, and 60, SCRCF filed on June 7, 2012.
11. "Petition for Appraisal S.C. Code Ann. § 29-3-680 *et. seq.*" filed on July 31, 2012.
12. Transcript of hearing on July 18, 2012.
13. Orders of Deficiency entered August 8, 2012.
14. Transcript of status conference on August 13, 2012.
15. Letter from Teri K. Stomski, Esquire, to The Honorable Joseph M. Strickland dated August 17, 2012, designating an appraiser.
16. Plaintiff's Motion to Vacate Foreclosure Sale filed on September 6, 2012.
17. Master's Deeds to SCORE, LLC, for both properties recorded August 16, 2012.
18. Summons and Order of Appointment Status Conference filed on October 18, 2012.
19. Order Denying Defendants' Motion to Alter or Amend Pursuant to Rule 59(e), SCRCF, entered on November 6, 2012.
20. Notice of Withdrawal of Plaintiff's Motion to Vacate Foreclosure Sale filed on July 10, 2014.
21. "Motion for Application of Appraisal Statute; Determination of Deficiency Against Defendants; and Final Adjudication of Counterclaims" filed on July 1, 2016.
22. Memorandum in Support of Denial of Attorney's Fees in Total Request for Costs filed on July 22, 2016.
23. Transcript of hearing on July 27, 2016.

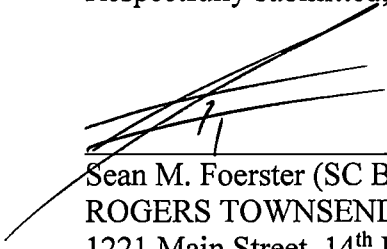
24. "Motion and Memorandum in Support of Amending the Counterclaims in the Two Above Entitled Cases" of Defendant Rhonda Meisner filed on August 19, 2016.
25. "Objection to Attorney's Fees Affidavit Submitted at the July 27, 2016 Hearing" filed on August 19, 2016.
26. Affidavit of Attorney's Fees filed on November 23, 2016.
27. Affidavit of Sean M. Foerster filed on November 23, 2016.
28. Transcript of hearing on February 1, 2017.
29. Order entered on July 27, 2017.
30. "Motion to Alter or Amend Pursuant to S.C.R.C.P. Rule 59(e) and Motion to Hold Actions Items in Abeyance Until Court Can Evaluate the Appraisal Evidence" filed on August 8, 2017.
31. Letter from to Sean M. Foerster to The Honorable Joseph M. Strickland dated September 1, 2017, with all enclosures, including the Letter from Eugene C. Garvin, Jr., dated August 30, 2017, and the two appraisals enclosed therewith.
32. Transcript of hearing on October 5, 2017.
33. Order Denying Motion to Alter or Amend and Entering Deficiency Judgments entered on December 28, 2017.
34. Motion to Lift Automatic Stay filed on April 20, 2018.
35. Order Lifting Automatic Stay entered on April 30, 2018.
36. Letter from Eugene C. Garvin, Jr., to Sean M. Foerster dated August 30, 2017, and filed on May 1, 2018, with the two appraisals enclosed therewith.
37. "Motion to Alter and Amend Pursuant to S.C.R.C.P. Rule 59(e)" filed herein on May 14, 2018.

38. Transcript of hearing on May 29, 2018.

39. Order entered on July 19, 2018.

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

Respectfully submitted,



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Sean M. Foerster (SC Bar # 77466)  
ROGERS TOWNSEND & THOMAS, PC  
1221 Main Street, 14<sup>th</sup> Floor (29201)  
Post Office Box 100200  
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Attorneys for Respondent South State Bank

December 4, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
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The Honorable Joseph M. Strickland, Master in Equity

Case Nos. 2011-CP-40-6317 and 2011-CP-40-6318  
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**PROOF OF SERVICE**

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I HEREBY CERTIFY that I have served the Designation of Matter to Be Included in the Record on Appeal on December 4, 2018, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following party of record:

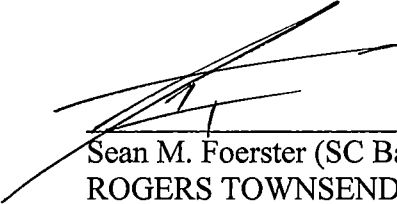
Glenn E. Bowens, Esquire  
P.O. Box 424  
Winnsboro, SC 129180

Rhonda Meisner  
P.O. Box 689  
Blythewood, SC 29016

Rhonda Meisner  
1012 Chester Road  
Blythewood, SC 29016

*[signature on the following page]*

*Proof of Service*



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Sean M. Foerster (SC Bar # 77466)  
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**VIA HAND DELIVERY**

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

RE: *South State Bank vs. Sand Dollar 31, LLC; Rhonda Meisner*  
Appellate Case # 2018-000251  
Our File # 16555.79

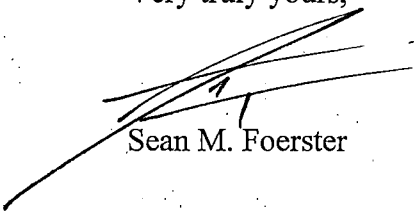
Dear Ms. Kitchings:

Enclosed are the original and four copies of the Initial Brief of the Respondent and a Designation of Matter to be Included in the Record of Appeal in reference to the above matter, along with a Proof of Service for each document.

By copy of this letter, I am serving copies of these documents on the other parties of record.

Please have your staff return the extra clocked copies of these documents to me via the courier. Thank you for your assistance in this matter.

Very truly yours,



Sean M. Foerster

/ow  
Enclosures

cc:

Glenn E. Bowens, Esquire  
PO Box 424  
Winnsboro, SC 129180

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