

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity

The Honorable Mikell Scarborough

Case No. 2010-CP-10-7992

Bank of America f/k/a Countrywide Home
Loans, d/b/a America's Wholesale Lending,

Respondent,

v.

Cornell L. Williams, Deborah P. Williams,
George Rodney Derrick, and Mary Scarbrough,
as Delinquent Tax Collector for Charleston County

Of whom

George Rodney Derrick is

Appellant.

RESPONDENT'S SUPPLEMENTAL RECORD ON APPEAL

Dean Hayes
Korn Law Firm, P.A.
1300 Pickens Street (29201)
Post Office Box 12369
Columbia, South Carolina 29211-2369
Telephone: (803) 252-5817
Attorney for Respondent

Steven L. Smith
Smith Closser, P.A.
7455 Cross County Road
Post Office Box 40578
Charleston, South Carolina 29423
Telephone: (843) 760-0220
Attorney for Appellant

RECEIVED

FEB 02 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity

The Honorable Mikell Scarborough

Case No. 2010-CP-10-7992

Bank of America f/k/a Countrywide Home
Loans, d/b/a America's Wholesale Lending,

Respondent,

v.

Cornell L. Williams, Deborah P. Williams,
George Rodney Derrick, and Mary Scarbrough,
as Delinquent Tax Collector for Charleston County

of whom George Rodney Derrick is,

Appellant.

RESPONDENT'S SUPPLEMENTAL RECORD ON APPEAL

Pursuant to this Court's Order dated January 8, 2015, Respondent supplements the Record on Appeal with the following documents:

1. Post and Courier Proof of Publication from 1/27/2011 to 2/10/2011.
2. Proof of Service, dated 1/12/2011.
3. Appellant's Motion to Reconsider filed May 5, 2014.



Dean Hayes
Korn Law Firm, P.A.
1300 Pickens Street (29201)
Post Office Box 12369
Columbia, South Carolina 29211-2369
Telephone: (803) 252-5817
Attorney for Respondent

January 15, 2015
Columbia, South Carolina

1410-03464

PETER D KORN
PO BOX 11264
COLUMBIA SC 29201

AFFIDAVIT OF PUBLICATION

The Post and Courier

State of South Carolina
County of Charleston

Personally appeared before me the undersigned advertising clerk of the above indicated newspaper published in the city of Charleston, county and state aforesaid, who, being duly sworn, says that the advertisement of

(copy attached)

appeared in the issues of said newspaper on the following day(s):

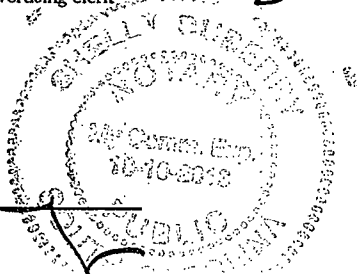
01/27/11 Thu PC	02/10/11 Thu CNW
02/03/11 Thu PC	
02/10/11 Thu PC	
01/27/11 Thu CNW	
02/03/11 Thu CNW	

at a cost of	\$460.37
Account#	105425
Order#	465450
P.O. Number:	K10-03464

Subscribed and sworn to before me this 14th day of February A.D. 2011

Keisha Edging
advertising clerk

Sherry Dale
NOTARY PUBLIC SC
My commission expires



State of South Carolina
County of Charleston
IN THE COURT OF
COMMON PLEAS FOR
THE NINTH
JUDICIAL CIRCUIT
C/A NO: 2010-CP-10-7992
Bank of America f/k/a
Countrywide Homes
Loans, d/b/a America's
Wholesale Lending, Plaintiff
vs.
Cornell L. Williams, Debo-
rah P. Williams, George
Rodney Derrick, And
Mary Scarborough, as
Delinquent Tax Collector
for Charleston County
Defendants
K10-03464
**SUMMONS AND NOTICE
OF FILING OF
COMPLAINT**
TO THE DEFENDANT
GEORGE RODNEY
DERRICK ABOVE
NAMED
YOU ARE HEREBY
SUMMONED and required
to answer the Complaint in
the above entitled action, a
copy of which is herewith
served upon you, and to
file a copy of your an-
swer upon the undersigned
at their office, 1300 Pickens
Ave., Post Office Box
M369, Columbia, South
Carolina 29211, within thirty
(30) days after service
hereof upon you, exclusive
of the day of such service,
and if you fail to answer the
complaint within the time
aforesaid or otherwise ap-
pear and defend, the Plain-
tiff in this action will apply
to the Court for the relief
demanded in the Com-
plaint, and judgment by de-
fault will be rendered
against you for the relief
demanded in the Com-
plaint.
**NOTICE IS HEREBY
GIVEN** that the original
complaint in the above en-
titled action was filed in the
office of the Clerk of Court
for Charleston County on
February 24, 2011.
CORN LAW FIRM, P.A.
Dean A. Hayes
S.C. Bar #46066
1300 Pickens Street
Post Office Box 12369
Columbia, SC 29211
Telephone: (803) 252-5817
Facsimile: (803) 231-2060
**ATTORNEY FOR
PLAINTIFF**
February 25, 2011
South Carolina
EAD# 465450

J. Al Cannon, Jr., Esq.
 Sheriff, Charleston County



Special Operations Department
 100 Broad Street
 Charleston, SC 29401-2206

Attorney or Party Without Attorney: KORN LAW FIRM P. O. BOX 12369 COLUMBIA, SC 29201-2369 Att For: BANK OF AMERICA		Telephone No. 803-252-5817	Court Use Only FILED 2011 JAN 20 PM 12:25 JULIE J. ARMSTRONG CLERK OF COURTS Case Number 2010CP107992
Name and Address of Court: CHARLESTON COUNTY COURT OF COMMON PLEAS		SHERIFF NO. CLPS-10015884-001	
Plaintiff: BANK OF AMERICA			BY _____
Defendant: CORNELL L. WILLIAMS, ET AL			
PROOF OF SERVICE (LIS P, SUM, COM, EXHIB)	Hearing Date 0/00/00	Time	

I, J. AL CANNON, JR., ESQ., SHERIFF in and for said County and State, do hereby certify that I have received the annexed:

CIVIL ACTION OVER SHEET; CERTIFICATE OF EXEMPTION; LIS PENDENS; SUMMONS AND COMPLAINT; EXHIBITS

on the 19th day of NOVEMBER, 2010, and that I attempted service on the 11th day of JANUARY, 2011, at the hour of 1:00 PM within the County of CHARLESTON, State of SOUTH CAROLINA, as follows on:

PARTY NAME: DERRICK, GEORGE RODNEY

01/11--86 SEASIDE COTTAGE LANE RESPONDENT'S MOTHER ADVISED THAT RESPONDENT NO LONGER LIVES IN SC AND SHE WILL TRY TO GET MESSAGE TO HIM. NO UPDATE IN DMV FILES

Adr Not Served: 86 SEASIDE COTTAGE LANE
 ISLE OF PALMS, SC 29451
 ** Attempted **
 Service By HAMPTON, DEPUTY C.

SHERIFF'S FEES	Charges
SERVICE FEE	15.00
** TOTALS **	15.00

I am a SOUTH CAROLINA SHERIFF, and I certify that the foregoing is true and correct.

ATTEST OF CERTIFIED TRUE COPY

J. AL CANNON, JR., ESQ., SHERIFF
 COUNTY OF CHARLESTON
 STATE OF SOUTH CAROLINA

NOTARY PUBLIC SOUTH CAROLINA

DATE: 1/12/11

MY COMMISSION EXPIRES: 7/14/18

BY _____

STATE OF SOUTH CAROLINA)

COUNTY OF CHARLESTON)

Bank of America f/k/a Countrywide Home)
Loans, d/b/a America's Wholesale Lending)

Plaintiff.)

vs.)

Cornell L. Williams, Deborah P. Williams,)
George Rodney Derrick and Mary)
Scarborough, as Delinquent Tax Collector for)
Charleston County)

Defendants.)


IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT
CASE NO.: 2010-CP-10-7992

Notice of Motion and
Motion to Reconsider

FILED
2014 MAY -5 PM 1:55
JULIE J. ARMSTRONG
CLERK OF COURT

YOU WILL PLEASE TAKE NOTICE, that the undersigned, as attorney for the Defendant, George Rodney Derrick, will move before Mikell R. Scarborough within ten (10) days from the service of this Motion or as soon thereafter as Counsel may be heard, for a Motion to Reconsider the Order filed on April 24, 2014. The basis of this Motion to Reconsider is that the Defendant, George Rodney Derrick, was never properly served and that the Plaintiff does not have standing to bring this action.

SMITH | CLOSSER



Steven L. Smith
SC Bar No.: 05173
7455 Cross County Road, Suite 1
P.O. Box 40578
Charleston, SC 29423-0578
843-760-0220
Attorney for the Defendant
George Rodney Derrick

5-4, 2014
Charleston, South Carolina
14-089

STATE OF SOUTH CAROLINA)

COUNTY OF CHARLESTON)

Bank of America f/k/a Countrywide Home)
Loans, d/b/a America's Wholesale Lending)

Plaintiff.)

vs.)

Cornell L. Williams, Deborah P. Williams,)
George Rodney Derrick and Mary)
Scarborough, as Delinquent Tax Collector for)
Charleston County)

Defendants.)

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT
CASE NO.: 2010-CP-10-7992

Certificate of Service

WILLIE J. ARMSTRONG
CLERK OF COURT

2014 MAY -5 PM 1:55

FILED

The undersigned hereby certifies that a true and accurate copy of the foregoing Defendants' Motion to Reconsider was served this 5th day of May, via U.S. Mail, postage prepaid, upon the following:

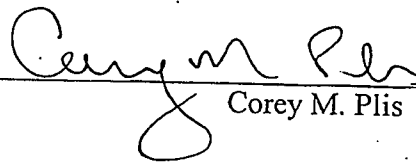
Dean Hayes
P.O. Box 11264
Columbia, SC 29211

Daniel M. Bradley
P.O. Box 2061
Mount Pleasant, SC 29465

Bernard E. Ferrara, Jr.
Mary Scarborough
4045 Bridge View Drive
North Charleston, SC 29405

R.W. Lingerfelter
995 Morrison Drive
Charleston, SC 29403

SMITH | CLOSSER, P.A.


Corey M. Plis

5-5, 2014
Charleston, South Carolina
14-089

9

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity

The Honorable Mikell Scarborough

Case No. 2010-CP-10-7992

Bank of America f/k/a Countrywide Home
Loans, d/b/a America's Wholesale Lending,

Plaintiff/Respondent,

v.

Cornell L. Williams, Deborah P. Williams,
George Rodney Derrick, and Mary Scarbrough,
as Delinquent Tax Collector for Charleston County

Defendants


Of Whom

George Rodney Derrick is

Appellant.

CERTIFICATE OF COUNSEL

The undersigned certifies that the Supplemental Record on Appeal, filed February 2, 2015, complies with Rule 211(b), SCACR.


Dean A. Hayes, Bar No.: 66066
Korn Law Firm, P.A.
1300 Pickens Street
Post Office Box 12369
Columbia, SC 29211-2359
(803) 252-5817
Attorney for Respondent

February 11, 2015

RECEIVED

FEB 17 2015

SC Court of Appeals