

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Joseph F. Strickland, Master in Equity Judge

Case No. 2018-00251

**RECEIVED**  
APR 10 2019  
SC Court of Appeals

SOUTH STATE BANK

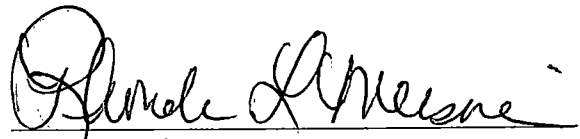
Respondent,

v.

Sand Dollar 31, LLC; Rhonda  
Meisner, of whom Rhonda  
Meisner is the

Appellant.

REPLY TO MOTION TO CORRECT RECORD ON APPEAL



Rhonda Meisner  
Post Office Box 689  
Blythewood, South Carolina 29016  
Pegasus333@icloud.com  
(803) 206-3402  
Appellant

April 9, 2019

The appellant, Rhonda Meisner, respectfully submits this reply to the petition for

The appellant respectfully replies to the respondent BANK's motion for correction of the record and requests a ruling on some of the requests for entry by the BANK.

The appellant apologizes to the Court and to the respondents for the mistakes she made in assembling the Record on Appeal. The record is in the process of correction and the appellant offers explanation for some of the deficiencies and requests a ruling on some previous exclusions.

The respondent BANK requested corrections/additions to the record that were not listed in its designation of matter. SCACR Rule 209 (b) provides that all materials should be designated, including exhibits. One example is, the BANK stated the exhibit was missing from the Motion to Lift the Automatic Stay; however, a review of the BANK's designation of matter did not include a request for the two appraisals listed as an exhibit to be duplicated in the record. The appraisals were already included in the record on appeal and again, the exhibit was not designated. Also, the form 4 for the December 28, 2017 case 2011-CP-40-6317 was not designated like the May 16, 2012 form 4 was and is a separate entry.

This Court had previously consolidated the two lower court cases because the arguments for valuation etc. were the same for both properties and were prosecuted at the same time. As such the appellant submitted motions and memorandums for the 2011-CP-40-6318 because of the previous consolidation and in most cases both cases were referenced in motions and memorandum which were included in the record; however, the respondent had designated filed copies *from each of the cases* in print above the larger bulleted document list and copies of both were not included.

The appellant has corrected the record on appeal in the following ways:

1. Added the letter from Teri Stomski inadvertently left out of the record.
2. Added the form 4 from May 16, 2012 that was designated.
3. The plaintiff's Motion to Vacate the Sale was included in the original record on appeal at p. 505 for the 6318 case- the appellant has added the 6317 Motion to Vacate to the record.
4. The Petition for appraisal was already included in the record at p. 457 for 6318. The petition for 6317 will be added to the record.
5. The Plaintiff's Motion to Vacate the Sale for 6318 was already included in the record at p. 500 the Motion to Vacate the Sale for 6317 will be added to the record.
6. The Letter from Eugene C. Garvin to Sean Foerster dated August 30, 2019 and filed on May 1, 2018 with the two appraisals therewith were already included in the record on p. 512.
7. Order entered on July 19, 2018 was added to the record.
8. The final page of 2011-CP-40-6317 was added to the record.
9. The first page of the hearing July 18, 2012 was added to the record.
10. The form 4 for the December 28, 2017 case 2011-CP-40-6317 was not designated and was a separate entry in the lower court record. The respondent BANK specifically listed the form 4 for the May 16, 2012 but did not request the form 4 for the December 28, 2017.

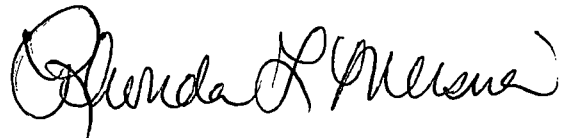
Again, the appellant respectfully apologizes for the mistakes in assembling the record and requests permission to file the record on appeal with the above changes noted including the

exclusion of documents not identified in the respondent BANK's designation of matter such as the exhibits attached to the Motion to Lift the Automatic Stay, duplicate appraisals, and non-designated form 4 documents.

Finally, because the appellant uses third parties to disassemble and rebind the record this Court's determination is required regarding the requests for additions not indicated in the designation of matter because the page numbers will change.

April 9, 2019

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Rhonda L. Meisner". The signature is written in a cursive style with a large initial "R".

Rhonda L. Meisner  
PO Box 689  
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Pegasus333@icloud.com  
(803)206-3402

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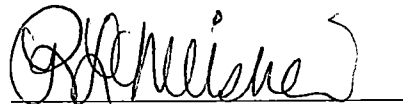
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CERTIFICATE OF SERVICE The appellant, Rhonda Meisner certifies she has served a copy of the REPLY TO MOTION TO CORRECT RECORD by mailing US postage prepaid to: Sean Foerster Rogers, Townsend, and Thomas, PC 1221 Main Street 14<sup>th</sup> floor Columbia, SC 29201: She has also emailed a digital copy to gbowens@bowenslawsc.com

April 9, 2019



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(803) 206-340244-1855  
Appellant

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April 9, 2019

The Honorable Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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Cc: Sean Foerster, Rogers Townsend and Thomas, PC 1221 Main Street 14<sup>th</sup> Floor  
Columbia, SC 29201; Glenn Bowens via email.

Re: Appellate Case No. 2018-00251

Dear Ms. Kitchings,

Enclosed please find the original reply to the motion to correct record on appeal, accompanied by its certificate of service. Would you kindly stamp and file with the Court the enclosed documents.

- 1) The enclosed reply in this case.
- 2) The certificate of service for the motion.

Thank you in advance for your assistance. You may contact me at (803)206-3402 via phone or [pegasus333@icloud.com](mailto:pegasus333@icloud.com) via email with regards to this filing request.

April 9, 2019

Warm regards,



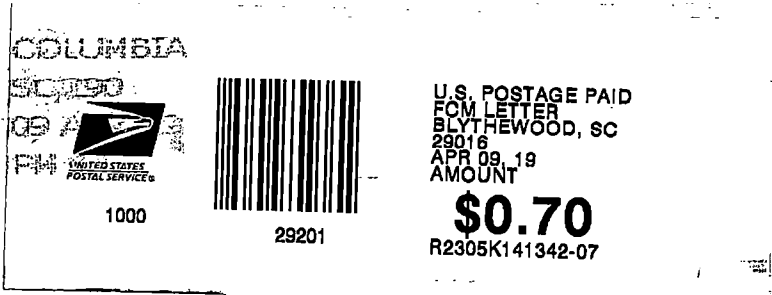
Rhonda Meisner  
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Rhonda

~~GRAND~~ MEISNER

~~1000~~ PO Box 689

Blythewood, SC 29016



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SC Court of Appeals

The Honorable Jimmy Abbott Ketchum, Clerk  
 Court of Appeals  
 1220 Senate Street  
 Columbia, SC  
 29201

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