

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
The Honorable Marvin H. Dukes, Master-in-Equity

Case No.: 2011-CP-07-0340
Appellate Case No.: 2019-000047

RECEIVED
JAN 17 2020
SC Court of Appeals

TD Bank, N.A., Successor by merger to Carolina First Bank, Respondent,

v.

Wilbert Roller, Jr., Betty V. Roller, and James Williams, Defendants,

Of Whom Wilbert Roller, Jr., Betty V. Roller are the Appellants.

FINAL BRIEF OF RESPONDENT

Respectfully submitted,

Matthew E. Tillman
Womble Bond Dickinson (US) LLP
5 Exchange Street
P. O. Box 999
Charleston, South Carolina 29402
(843) 722-3400

ATTORNEYS FOR RESPONDENT

January 8, 2020
Charleston, South Carolina



January 16, 2020

Womble Bond Dickinson (US) LLP

Post Office Box 999
Charleston, SC 29402

5 Exchange Street
Charleston, SC 29401

VIA FEDERAL EXPRESS

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

t: 843.722.3400

f: 843.723.7398

Matthew E. Tillman

Attorney at Law

Direct Dial: 843-720-4629

E-mail: Matthew.Tillman@wbd-us.com

RECEIVED

JAN 17 2020

SC Court of Appeals

Re: TD Bank, N.A. v. Roller
Appellate Case No.: 2019-000047
WBD Ref: 77222.0022.0

Dear Ms. Kitchings:

Enclosed please find labels containing the corrected title page for the Final Brief of Respondent in the above-referenced matter.

By copy of this letter with enclosures, we are providing labels to Appellants' counsel as well.

Your assistance is greatly appreciated.

Yours very truly,

Womble Bond Dickinson (US) LLP

Matthew E. Tillman/cbc
Matthew E. Tillman

MET/cbc
Enclosures

cc: Thomas R. Goldstein, Esq.

ORIGIN ID:RBWA (843) 722-3400
CAROL CASEY
WOMBLE BOND DICKINSON (US) LLP
5 EXCHANGE STREET

SHIP DATE: 16JAN20
ACTWGT: 0.50 LB
CAD: 250117340/WSX13400

CHARLESTON, SC 29401
UNITED STATES US

BILL SENDER

TO **HON. JENNY ABBOTT KITCHINGS**
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE ST

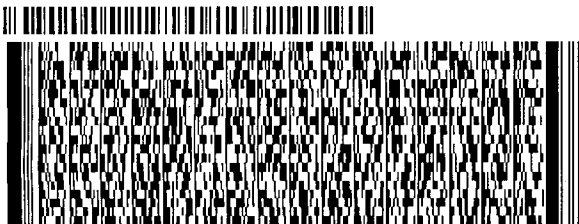
COLUMBIA SC 29201

(843) 720-4671
INV.
PO:

REF: 77222-0027.0/2911

DEPT:

567.0JDFE9205A2



FRI - 17 JAN 10:30A
PRIORITY OVERNIGHT

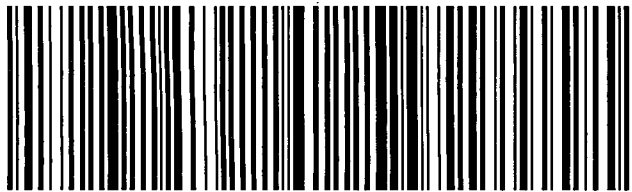
TRK# 7797 1658 5037
0201

ASR

29201

SC-US CAE

28 USCA



RECEIVED

JAN 17 2020

SC Court of Appeals

FOLD on this line and place in shipping pouch with bar code and delivery address visible

1. Fold the first printed page in half and use as the shipping label.
2. Place the label in a waybill pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.
3. Keep the second page as a receipt for your records. The receipt contains the terms and conditions of shipping and information useful for tracking your package.

Legal Terms and Conditions

Tendering packages by using this system constitutes your agreement to the service conditions for the transportation of your shipments as found in the applicable FedEx Service Guide, available upon request. FedEx will not be responsible for any claim in excess of the applicable declared value, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the applicable FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of 100 USD or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is 500 USD, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see applicable FedEx Service Guide. FedEx will not be liable for loss or damage to prohibited items in any event or for your acts or omissions, including, without limitation, improper or insufficient packaging, securing, marking or addressing, or the acts or omissions of the recipient or anyone else with an interest in the package. See the applicable FedEx Service Guide for complete terms and conditions. To obtain information regarding how to file a claim or to obtain a Service Guide, please call 1-800-GO-FEDEX (1-800-463-3339).