

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

**RECEIVED**

MAY 15 2020

Michael G. Nettles, Circuit Court Judge

**SC Court of Appeals**

Appellate Case No. 2019-001527

Sandy Hill Partners. LLC

Appellant.

v.

Central Palmetto Asset Management, LLC and  
Florence County

Respondents.

**RESPONDENT'S DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD OF APPEAL**

Theodore von Keller #5718  
Crawford & von Keller, LLC  
P.O. Box 4216  
Columbia, SC 29240  
803-790-7444  
803-790-1277 Fax  
Email: ted@crawfordvk.com  
Attorney for Respondent  
Central Palmetto Asset Management, LLC

Respondent Central Palmetto Asset Management, LLC proposes include in the Record on Appeal:

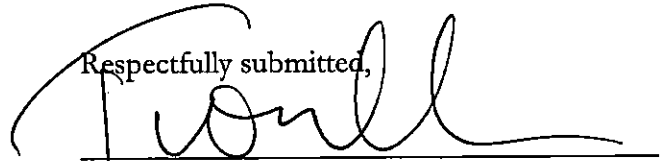
1. **Summons and Complaint**
2. **Answer of CPAM**
3. **Answer of Florence County**
4. **Amended Answer and Counter-Claim of CPAM**
5. **Reply to Counter Claim**
6. **CPAM Motion for Summary Judgment**
7. **Plaintiff's Memorandum in Opposition to Summary Judgment**
8. **Affidavit of Andrew Nissan**
9. **Transcript of Hearing, Dated April 1, 2019**
10. **Order Dated May 6, 2019**
11. **Transcript of Hearing, Dated August 26, 2019**
12. **Deed**
13. **Spreadsheet of Lots**
14. **Titles to Four Homes in RMR Rental and Investment LLC 3**
15. **Titles to Four Homes in Sandy Hill Partners, LLC**
16. **Tax Sale Information Sheet for Four Homes**
17. **Advertisement**
18. **DMV Records for Four Homes**
19. **Findings of Fact, Dated September 4, 2019**
20. **Plaintiff's Motion to Reconsider**
21. **Form 4 Order Denying motion to reconsider, Dated September 6, 2019**
22. **Notice of Appeal**
23. **Florence County Tax Sale File – MBP#28000-43-352 – 1995 Sunshine 16x76**
  - a. **Letter from Florence County Tax Collector dated March 28, 2016 to Delinquent Tax Collector of Florence County Re: 1995 Sunshine 16x76**
  - b. **Official Notice of Delinquent Tax dated April 12, 2016**
  - c. **Notice of Levy dated May 20, 2016**
  - d. **Certified Mail information to Mark M. Richardson**
  - e. **Return Receipt signed for by Mark M. Richardson dated June 3, 2016**
  - f. **Notice of Levy signed by Albert Ivey**
  - g. **Delinquent Tax Sale publication**
  - h. **Property Sold for Taxes notice dated October 3, 2016**
  - i. **Letter to Mark M. Richardson Re: 1995 Sunshine 16x76 dated November 15, 2016**
  - j. **Letter to Mark M. Richardson Re: 1995 Sunshine 16x76 dated February 2, 2017**
  - k. **SCDMV Inquiry on 1995 Sunshine MBH dated 2/9/2017**
  - l. **Letter to RMR Rental and Investment LLC 3 from Delinquent Tax Division**
  - m. **Letter to Mark M. Richardson Re: 1995 Sunshine 16x76 dated October 3, 2016**
  - n. **SCDMV Inquiry on 1995 Sunshine MBH dated 9/11/2017**
  - o. **Florence County Tax Deeds dated October 3, 2016**

- p. Letter to Mark M. Richardson from Florence County Delinquent Tax Division dated September 11, 2017
  - q. Certified Mail Receipt information signed on September 15, 2017
  - r. Letter to Sandy Hill Partners LLC from Florence County Delinquent Tax Division dated September 11, 2017
  - s. Certified Mail Reception information signed for on September 14, 2017
  - t. 2016 Tax Sale Information Sheet for Bill of Sale on Mobile Home
  - u. Letter to Central Palmetto Asset Management from Florence County Delinquent Tax Division dated December 4, 2017
  - v. Spreadsheet of 6 Mobile Homes – Central Palmetto Asset Management
- 24. Florence County Tax Sale File – MBP#27000-42-956 – 1997 Bellcrest 16x76**
- a. Letter from Florence County Tax Collector dated March 28, 2016 to Delinquent Tax Collector of Florence County Re: 1997 Bellcrest 16x76
  - b. Official Notice of Delinquent Tax dated April 12, 2016
  - c. Notice of Levy dated May 20, 2016
  - d. Certified Mail information to Mark M. Richardson
  - e. Return Receipt signed for by Mark M. Richardson dated June 3, 2016
  - f. Notice of Levy signed by Albert Ivey
  - g. Delinquent Tax Sale publication
  - h. Property Sold for Taxes notice dated October 3, 2016
  - i. Letter to Mark M. Richardson Re: 1997 Bellcrest 16x76 dated November 15, 2016
  - j. Letter to Mark M. Richardson Re: 1997 Bellcrest 16x76 dated February 2, 2017
  - k. SCDMV Inquiry on 1997 Bellcrest MBH dated 2/9/2017
  - l. Letter to RMR Rental and Investment LLC 3 from Delinquent Tax Division
  - m. Letter to Mark M. Richardson Re: 1997 Bellcrest 16x76 dated October 3, 2016
  - n. SCDMV Inquiry on 1997 Bellcrest MBH dated 9/11/2017
  - o. Florence County Tax Deeds dated October 3, 2016
  - p. Letter to Mark M. Richardson from Florence County Delinquent Tax Division dated September 11, 2017
  - q. Certified Mail Receipt information signed on September 15, 2017
  - r. Letter to Sandy Hill Partners LLC from Florence County Delinquent Tax Division dated September 11, 2017
  - s. Certified Mail Reception information signed for on September 14, 2017
  - t. 2016 Tax Sale Information Sheet for Bill of Sale on Mobile Home
  - u. Letter to Central Palmetto Asset Management from Florence County Delinquent Tax Division dated December 4, 2017
  - v. Spreadsheet of 6 Mobile Homes – Central Palmetto Asset Management
- 25. Florence County Tax Sale File - MBP#2500-40-369 – 1996 Oakwood 24x44**
- a. Letter from Florence County Tax Collector dated March 28, 2016 to Delinquent Tax Collector of Florence County Re: 1996 Oakwood 24x44
  - b. Official Notice of Delinquent Tax dated April 12, 2016
  - c. Notice of Levy dated May 20, 2016
  - d. Certified Mail information to Mark M. Richardson

- e. Return Receipt signed for by Mark M. Richardson dated June 3, 2016
  - f. Notice of Levy signed by Albert Ivey
  - g. Delinquent Tax Sale publication
  - h. Property Sold for Taxes notice dated October 3, 2016
  - i. Letter to Mark M. Richardson Re: 1996 Oakwood 24x44dated November 15, 2016
  - j. Letter to Mark M. Richardson Re: 1996 Oakwood 24x44dated February 2, 2017
  - k. SCDMV Inquiry on 1996 Oakwood MBH dated 2/9/2017
  - l. Letter to RMR Rental and Investment LLC 3 from Delinquent Tax Division
  - m. Letter to Mark M. Richardson Re: 1996 Oakwood 24x44dated October 3, 2016
  - n. SCDMV Inquiry on 1996 Oakwood MBH dated 9/11/2017
  - o. Florence County Tax Deeds dated October 3, 2016
  - p. Letter to Mark M. Richardson from Florence County Delinquent Tax Division dated September 11, 2017
  - q. Certified Mail Receipt information signed on September 15, 2017
  - r. Letter to Sandy Hill Partners LLC from Florence County Delinquent Tax Division dated September 11, 2017
  - s. Certified Mail Reception information signed for on September 14, 2017
  - t. 2016 Tax Sale Information Sheet for Bill of Sale on Mobile Home
  - u. Letter to Central Palmetto Asset Management from Florence County Delinquent Tax Division dated December 4, 2017
  - v. Spreadsheet of 6 Mobile Homes – Central Palmetto Asset Management
- 26. Florence County Tax Sale File – MBP#27000-43-062 – 2000 Fleetwood 28x76**
- a. Letter from Florence County Tax Collector dated March 28, 2016 to Delinquent Tax Collector of Florence County Re: 2000 Fleetwood 28x76
  - b. Official Notice of Delinquent Tax dated April 12, 2016
  - c. Notice of Levy dated May 20, 2016
  - d. Certified Mail information to Mark M. Richardson
  - e. Return Receipt signed for by Mark M. Richardson dated June 3, 2016
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  - h. Property Sold for Taxes notice dated October 3, 2016
  - i. Letter to Mark M. Richardson Re: 2000 Fleetwood 28x76 dated November 15, 2016
  - j. Letter to Mark M. Richardson Re: 2000 Fleetwood 28x76 dated February 2, 2017
  - k. SCDMV Inquiry on 2000 Fleetwood MBH dated 2/9/2017
  - l. Letter to RMR Rental and Investment LLC 3 from Delinquent Tax Division
  - m. Letter to Mark M. Richardson Re: 2000 Fleetwood 28x76 dated October 3, 2016
  - n. SCDMV Inquiry on 2000 Fleetwood MBH dated 9/11/2017
  - o. Florence County Tax Deeds dated October 3, 2016
  - p. Letter to Mark M. Richardson from Florence County Delinquent Tax Division dated September 11, 2017

- q. **Certified Mail Receipt information signed on September 15, 2017**
- r. **Letter to Sandy Hill Partners LLC from Florence County Delinquent Tax Division dated September 11, 2017**
- s. **Certified Mail Reception information signed for on September 14, 2017**
- t. **2016 Tax Sale Information Sheet for Bill of Sale on Mobile Home**
- u. **Letter to Central Palmetto Asset Management from Florence County Delinquent Tax Division dated December 4, 2017**
- v. **Spreadsheet of 6 Mobile Homes – Central Palmetto Asset Management**

Respectfully submitted,



Theodore von Keller #5718  
Crawford & von Keller, LLC  
P.O. Box 4216  
Columbia, SC 29240  
803-790-7444  
803-790-1277 Fax  
Email: ted@crawfordvk.com  
Attorney for Respondent  
Central Palmetto Asset Management, LLC

May 15, 2020

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Michael G. Nettles, Circuit Court Judge

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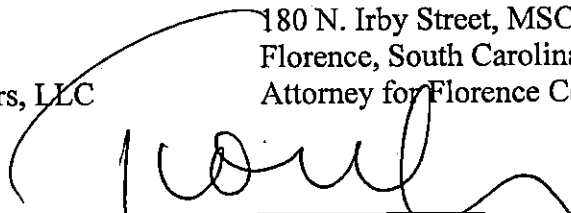
RESPONDENT'S DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD OF APPEAL

**PROOF OF SERVICE**

I certify that I served the foregoing designation of matter in this case by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

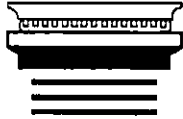
Walker H. Willcox, Esquire  
Willcox, Buyck, & Williams, P.A.  
Post Office Box 1909  
Florence, SC 29503  
Attorney for Sandy Hills Partners, LLC

D. Malloy McEachin, Jr.  
D. Malloy McEachin, Jr. P.A  
180 N. Irby Street, MSC-XX  
Florence, South Carolina 29501  
Attorney for Florence County



THEODORE VON KELLER, SC BAR NO. 5718  
CRAWFORD & VON KELLER, LLC  
POST OFFICE BOX 4216  
COLUMBIA, SOUTH CAROLINA 29240  
(803) 790-2626  
ATTORNEYS FOR RESPONDENT

May 15, 2020



**CRAWFORD & VON KELLER, LLC**

May 15, 2020

**VIA HAND DELIVERY**

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

**RECEIVED**  
MAY 15 2020  
SC Court of Appeals

**RE: Sandy Hills Partners, LLC vs. Central Palmetto Asset Management, LLC  
and Florence County  
Appellate Case No.: 2019-001527**

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Appellant's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service. Please file the original.

Should you require anything further please do not hesitate to contact me.

Sincerely,

Theodore von Keller

Enclosure(s)

cc:

Walker H. Willcox, Esquire  
Willcox, Buyck, & Williams, P.A.  
Post Office Box 1909  
Florence, SC 29503

D. Malloy McEachin, Jr. P.A.  
180 N. Irby Street, MSC-XX  
Florence, South Carolina 29501  
Attorney for Florence County