

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
Gordon G. Cooper, Master-in-Equity

Appellate Case No. 2020-0000454

U.S. Bank, NA, as trustee relating to the Chevy Chase Funding, LLC Mortgage Backed
Certificates, Series 2004-B,Plaintiff,

v.

Alyce F. Otto, Individually; Alyce F. Otto, Trustee Under Declaration of Trust of Alyce F.
Otto dated the 17th of November 2009; TD Bank, NA; The United States of America,
acting by and through its agency, the Internal Revenue Service; Laura Kerhulas Giese, as
Co-Trustee of the Theodore Ernest Kerhulas Trust Under Declaration of Trust dated May
25, 2004; Mark Warner Kerhulas, as Co-Trustee of the Theodore Ernest Kerhulas Trust
Under Declaration of Trust dated May 25, 2004; Jackson L. Munsey, Jr.; Citibank, NA,
.....Defendants,

and

Alyce F. Otto, Trustee Under Declaration of Trust of Alyce F. Otto dated November 17,
2009,Plaintiff,

v.

Jackson L. Munsey, Jr. Defendant,

of whom Jackson L. Munsey, Jr., is the Appellant,

and

Alyce F. Otto, Individually; Alyce F. Otto, Trustee Under Declaration of Trust of Alyce F.
Otto dated the 17th of November 2009; Laura Kerhulas Giese, as Co-Trustee of the
Theodore Ernest Kerhulas Trust Under Declaration of Trust dated May 25, 2004; Mark
Warner Kerhulas, as Co-Trustee of the Theodore Ernest Kerhulas Trust Under Declaration
of Trust dated May 25, 2004 are the..... Respondents.

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following to be included in the Record on Appeal:

1. Order as to bond and judgment;
2. Order filed Feb. 28, 2020, denying motion to reconsider;
3. Ct. App. Op. No. 2018-UP-075 (filed Feb. 7, 2018);
4. Order filed April 19, 2016, with exhibits;
5. Judgment of foreclosure and sale;
6. Order as to Otto v. Munsey filed Dec. 15, 2015;
7. Otto-Munsey contract;
8. Otto v. Munsey complaint;
9. Order denying motion to set aside default in Otto v. Munsey;
10. Affidavit of default in Otto v. Munsey;
11. U.S. Bank v. Otto complaint;
12. Affidavit of default in U.S. Bank v. Otto;
13. Order of reference in U.S. Bank v. Otto;
14. Order of reference in Otto v. Munsey;
15. Order consolidating cases;
16. Orders denying relief from default;
17. Report on sale;
18. Motion to recover bond and enter judgment;
19. Transcript of Oct. 29, 2019, hearing, with exhibits;
20. Order as to bond and judgment filed Dec. 27, 2019;
21. Email from Munsey's counsel re: Dec. 2019 order;
22. Email from Kerhulas Trustees' counsel re: Dec. 2019 order;
23. Order vacating Dec. 2019 order;
24. Munsey proposed order;
25. Email from master directing status conference;
26. Otto memorandum filed Jan. 21, 2020, with exhibits;
27. Affidavit of Madelon Wallace, with exhibits; and
28. Transcript of Jan. 23, 2020, status conference.

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

Respectfully submitted,

/s/ Andrew S. Radeker
Andrew S. Radeker
S.C. Bar No. 73743
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

July 20, 2020

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Citibank, NA,Defendants,

and

Alyce F. Otto, Trustee Under Declaration of Trust of Alyce F. Otto dated November
17, 2009.....Plaintiff,

v.

Jackson L. Munsey, Jr.....Defendant.

of whom Jackson L. Munsey, Jr., is the.....Appellant,

and

Alyce F. Otto, Individually; Alyce F. Otto, Trustee Under Declaration of Trust of Alyce
F. Otto dated the 17th of November 2009; Laura Kerhulas Giese, as Co-Trustee of the
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PROOF OF SERVICE

I certify that I served the appellant's designation of matter to be included in the record on appeal in this case by providing a copy of it by email to opposing counsel at the email address(es) shown below and on the date shown below:

Sarah P. Spruill, Esq.
sspruill@hsblawfirm.com

Max T. Hyde, Jr., Esq.
max@maxhydelawfirm.com

Samantha N. Larkins, Esq.
samantha@maxhydelawfirm.com

David L. Walsh, Esq.
dlwalsh@gainesandwalsh.com

Respectfully submitted,

/s/ Andrew S. Radeker
Andrew S. Radeker
S.C. Bar No. 73743
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
drew@harrisonfirm.com
Attorney for Appellant

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