

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Bentley D. Price
Circuit Court Judge

Case No. 2017-CP-10-4445
Appellate Case No. 2019-001732

RECEIVED
Sep 28 2020
SC Court of Appeals

Kathleen A. Grant, Dylan T.
Grant, Devin D. Grant, and
Andrea J. Grant, Appellants,

v.

Nationstar Mortgage, LLC, Respondent.

**APPELLANTS' MOTION
TO AMEND RECORD ON APPEAL**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellants Kathleen A. Grant, Devin D. Grant, and Andrea Grant (“Appellants”), through there undersigned counsel, move to Amend the Record on Appeal filed on September 23, 2020. The grounds for this motion are that on September 24, 2020, Counsel for Respondent Nationstar informed the undersigned that the Record on Appeal did not include the exhibits to Nationstar’s Pre-Trial Brief. (Email Correspondence, Exhibit A). Counsel for Nationstar had emailed the exhibits to the trial court as files separate from the Pre-Trial Brief. (Email Correspondence Exhibit B). Appellants now move to include these exhibits in the Record on Appeal so that the parties may complete their final briefs. The Amended Record on Appeal has been filed concurrently with this Motion.

Respectfully Submitted,

s/Jesse Sanchez

Jesse Sanchez, Esquire

SC Bar No. 101906

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SC Bar No. 65477

SLOTCHIVER & SLOTCHIVER, LLP

751 Johnnie Dodds Boulevard, Suite 100

Mount Pleasant, SC 29464

(843) 577-6531

Attorneys for Appellants

Charleston, South Carolina

September 26, 2020

EXHIBIT A

From: Tamasitis, John G. johntamasitis@parkerpoe.com
Subject: RE: 2019-001732 Grant v Nationstar - Record on Appeal - 092320
Date: September 24, 2020 at 3:32 PM



To: Jesse Sanchez jesse@jessesanchezlaw.com, Hershon, Lawrence M. lawrencehershon@parkerpoe.com, Dan dan@slotchiverlaw.com, Steve Spitz sas@spitzandneville.com, Ryan Neville irn@spitzandneville.com, Steve Slotchiver steve@slotchiverlaw.com, Susan Maulden paralegal@slotchiverlaw.com

Jesse,

Based on our initial review of the Record on Appeal that was submitted, it appears that the Exhibits to Nationstar's Pre-Trial Brief have been omitted. If I am missing something, please let me know. Otherwise, can you please supplement your submission to the Court?

Thank you,

John

From: Jesse Sanchez <jesse@jessesanchezlaw.com>
Sent: Wednesday, September 23, 2020 8:15 AM
To: Tamasitis, John G. <johntamasitis@parkerpoe.com>; Hershon, Lawrence M. <lawrencehershon@parkerpoe.com>; Dan <dan@slotchiverlaw.com>; Steve Spitz <sas@spitzandneville.com>; Ryan Neville <irn@spitzandneville.com>; Steve Slotchiver <steve@slotchiverlaw.com>; Susan Maulden <paralegal@slotchiverlaw.com>
Subject: 2019-001732 Grant v Nationstar - Record on Appeal - 092320

*****Caution: External email*****

Counsel,

Attached for service, please find the Record on Appeal and corresponding Cover Letter in the above-captioned matter, which is being filed momentarily with the Court of Appeals via One Drive.



Regards,

Jesse

--

Jesse Sanchez
The Law Office of Jesse Sanchez, LLC
98 1/2 Broad Street, Suite B
Charleston, SC 29401
P: (843) 814-8181
F: (843) 284-3953
jesse@jessesanchezlaw.com

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John Tamasitis

Associate



1221 Main Street | Suite 1100 | Columbia, SC 29201

Office: 803.253.8923 | Mobile: 803.360.2970 | Fax: 803.255.8017 | [vcard](#) | [map](#)

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www.parkerpoe.com

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EXHIBIT B

From: Tamasitis, John G. johntamasitis@parkerpoe.com
Subject: RE: 2019-001732 Grant v Nationstar - Record on Appeal - 092320
Date: September 24, 2020 at 4:47 PM
To: Jesse Sanchez jesse@jessesanchezlaw.com
Cc: Dan dan@slotchiverlaw.com, Hershon, Lawrence M. lawrencehershon@parkerpoe.com, Ryan Neville irn@spitzandneville.com, Steve Slotchiver steve@slotchiverlaw.com, Steve Spitz sas@spitzandneville.com, Susan Maulden paralegal@slotchiverlaw.com



Jesse,

See attached. Thank you,

John

From: Jesse Sanchez <jesse@jessesanchezlaw.com>
Sent: Thursday, September 24, 2020 4:38 PM
To: Tamasitis, John G. <johntamasitis@parkerpoe.com>
Cc: Dan <dan@slotchiverlaw.com>; Hershon, Lawrence M. <lawrencehershon@parkerpoe.com>; Ryan Neville <irn@spitzandneville.com>; Steve Slotchiver <steve@slotchiverlaw.com>; Steve Spitz <sas@spitzandneville.com>; Susan Maulden <paralegal@slotchiverlaw.com>
Subject: Re: 2019-001732 Grant v Nationstar - Record on Appeal - 092320

*****Caution: External email*****

John,

Was the pre-trial brief with exhibits filed or emailed to the Judge? If so, send it to me and I'll amend the record.

Thank you,

Jesse

On Thu, Sep 24, 2020 at 3:32 PM Tamasitis, John G. <johntamasitis@parkerpoe.com> wrote:

|

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John Tamasitis
Associate



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www.parkerpoe.com



Mail Attachment



Nationstar Pre-Trial Br...al).pdf



Ex. B - Exhibit List.pdf



Ex. C - Propos...der.pdf



Ex. A - Propos...cts.pdf

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
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The Honorable Bentley D. Price
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PROOF OF SERVICE

I, the undersigned, certify that I have served *Appellants' Motion to Amend Record on Appeal* and corresponding *Amended Record on Appeal* on Respondent Nationstar Mortgage LLC, by emailing a copy of the same addressed to its attorneys of record on September 26, 2020 at the following email addresses:

Lawrence M. Hershon, Esq. (lawrencehershon@parkerpoe.com), and

John G. Tamasitis, Esq. (johntamasitis@parkerpoe.com).

Pursuant to the May 29, 2020 Order of the Supreme Court, a copy of the aforementioned email correspondence is attached.

s/Jesse Sanchez
Jesse Sanchez, Esquire
SC Bar No. 101906
THE LAW OFFICE OF JESSE SANCHEZ, LLC
98 ½ Broad Street, Suite B
Charleston, SC 29401
(843) 814-8181

Charleston, South Carolina
September 26, 2020

From: Jesse Sanchez jesse@jessesanchezlaw.com
Subject: 2019-001732 Grant v Nationstar - Amended Record on Appeal - 092620
Date: September 26, 2020 at 9:32 AM



To: Tamasitis, John G. johntamasitis@parkerpoe.com, Hershon, Lawrence M. lawrencehershon@parkerpoe.com, Dan dan@slotchiverlaw.com, Steve Slotchiver steve@slotchiverlaw.com, Steve Spitz sas@spitzandneville.com, Ryan Neville irn@spitzandneville.com, Susan Maulden paralegal@slotchiverlaw.com

Counsel,

Per your request, attached for service, please find Appellants' Motion to Amend the Record on Appeal, the Amended Record on Appeal, and the corresponding Cover Letter to the Court, which are all being filed with the Court of Appeals momentarily via One Drive.

Regards,

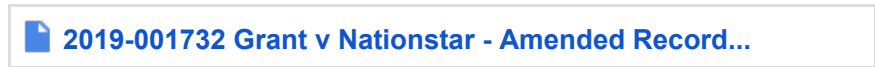
Jesse

--

Jesse Sanchez
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September 26, 2020

VIA ONEDRIVE ELECTRONIC SUBMISSION

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

**RE: Kathleen A. Grant, Dylan T. Grant, Devin D. Grant, and Andrea J. Grant,
Appellants v. Nationstar Mortgage, LLC, Respondent.
Appellate Case No. 2019-001732**

Dear Ms. Kitchings:

Attached for filing, please find *Appellants' Motion to Amend the Record on Appeal, Amended Record on Appeal*, and corresponding *Proof of Service*. A check from my firm for the \$50.00 filing fee has been placed in today's outgoing mail.

Thank you for your time and attention to this matter. Should you have any questions, please do not hesitate to contact me at 843-814-8181.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez

Enclosure as stated

cc: Stephen A. Spitz, Esq.
Daniel S. Slotchiver, Esq.
Stephen M. Slotchiver, Esq.
Lawrence M. Hershon, Esq.
John G. Tamasitis, Esq.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

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2019-001732
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September 26, 2020

VIA ONEDRIVE ELECTRONIC SUBMISSION

The Honorable Jenny Abbott Kitchings
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P.O. Box 11629
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SC Court of Appeals

RE: Kathleen A. Grant, Dylan T. Grant, Devin D. Grant, and Andrea J. Grant,
Appellants v. Nationstar Mortgage, LLC, Respondent.
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Dear Ms. Kitchings:

Attached for filing, please find *Appellants' Motion to Amend the Record on Appeal, Amended Record on Appeal*, and corresponding *Proof of Service*. A check from my firm for the \$50.00 filing fee has been placed in today's outgoing mail.

Thank you for your time and attention to this matter. Should you have any questions, please do not hesitate to contact me at 843-814-8181.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez

Enclosure as stated

cc: Stephen A. Spitz, Esq.
Daniel S. Slotchiver, Esq.
Stephen M. Slotchiver, Esq.
Lawrence M. Hershon, Esq.
John G. Tamasitis, Esq.

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