

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**RECEIVED**

**Oct 23 2020**

**SC Court of Appeals**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master in Equity

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Appellate Case No.: 2020-001202

Wilmington Savings Fund Society, FSB, as Trustee of  
Upload Mortgage Loan Trust A,..... Respondent,

v.

The Personal Representatives, if any, whose names are unknown,  
of the Estates of Frank Lucas aka Frank M. Lucas; Carole S. Lucas  
aka Carole Sunny Goodson-Lucas. .... Appellants.

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

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Respondent hereby designates the following matter to be included in the Record on  
Appeal:

1. Summons and Complaint;
2. Affidavits of Service on Frank Lucas and Carole Lucas;
3. Answer and Counterclaims on behalf of Carole Lucas;
4. Motion to Dismiss Counterclaims;
5. Order Granting Motion to Dismiss Counterclaims;
6. Amended Summons and Complaint;
7. Affidavit of Diligent Search for James Crawford;
8. Affidavit of Diligent Search for Marc Goodson;

9. Affidavits of Non-Service for James Crawford and Marc Goodson;
10. Motion for Order of Appointment of Guardian ad Litem;
11. Order Appointing Guardian ad Litem;
12. Motion for Service by Publication;
13. Order for Service by Publication;
14. Motion for Order of Reference;
15. Order of Reference;
16. Answer and Consent to Reference by Does;
17. Affidavit of Non-Military Service;
18. Master's Order for Judgment of Foreclosure and Sale;
19. Record of Hearing;
20. Motion to Set Aside Default Judgment;
21. Order Denying Motion to Set Aside Default Judgment;
22. Motion to Stay Judgment Pending Appeal;
23. Order on Motion to Stay Judgment Pending Appeal.

I hereby certify that none of the designations are irrelevant to the appeal.

RILEY POPE & LANEY, LLC

s/Damon C. Wlodarczyk

Damon C. Wlodarczyk

S.C. Bar No. 70460

Post Office Box 11412

Columbia, South Carolina 29211

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Attorney for Respondent

Columbia, South Carolina

October 23, 2020

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CERTIFICATE OF SERVICE

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As allowed by Supreme Court Amended Order 2020-05-29-02, this is to certify that  
I have this day caused to be served upon the person named below a copy of the  
**Respondent's Initial Brief and Designation of Matter to be Included in the Record on  
Appeal** via electronic mail to counsel's AIS E-mail address as follows:

Glenn Walters, Sr., Esq.  
Attorney for Appellant  
[glennwalterspa@gmail.com](mailto:glennwalterspa@gmail.com)

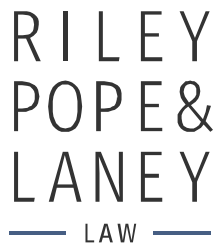
RILEY POPE & LANEY, LLC

s/Damon C. Wlodarczyk  
Damon C. Wlodarczyk  
S.C. Bar No. 70460  
Attorney for Respondent

Columbia, South Carolina  
October 23, 2020

**South Carolina**

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Charlotte, NC 28205  
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Fax: 704.625.9430

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**SC Court of Appeals**

(Via E-mail only: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Wilmington Savings Fund Society, FSB, as Trustee of Upload Mortgage Loan Trust A, Respondent, v. The Personal Representatives, if any, whose names are unknown, of the Estates of Frank Lucas aka Frank M. Lucas; Carole S. Lucas aka Carole Sunny Goodson-Lucas, Appellants.

Appellate Case No.: 2020-001202

Our File No.: 4043.27117

Dear Clerk:

As allowed by Supreme Court Administrative Order 2020-05-29-02, please find attached for filing Respondent's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and proof of service.

Please do not hesitate to contact me should you have any questions or concerns.

Sincerely,

s/Damon C. Wlodarczyk  
S.C. Bar No. 70460

DCW/

cc: Glenn Walters, Sr., Esquire (via e-mail only)