

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Jul 25 2022**

**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case No. 2019-CP-10-4053

Blind Acre, Inc., Respondent-Appellant,

v.

Stash Storage Holdings, Inc., Appellant-Respondent.

**APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S DESIGNATION  
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

BEN TRAYWICK LAW FIRM, LLC  
Benjamin A.C. Traywick, SC Bar #74027  
Alexandra Scott Williams, SC Bar #102862  
171 Church Street, Ste 340  
Charleston, SC 29401  
T: 843-872-1709 | F: 843-695-7839  
ben@bentraywicklaw.com  
ali@bentraywicklaw.com

*Attorneys for Appellant-Respondent*

**Other Counsel of Record:**

G. Rutledge DuRant (SC Bar #: 73944)  
RIESEN DURANT LLC  
613 Long Point Road, Suite 100  
Mount Pleasant, South Carolina 29464  
Phone: 843.800.0809 | Fax: 843.767.3282  
Email: rutledge@riesendurant.com

*Attorney for the Respondent-Appellant*

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

1. Complaint filed July 31, 2019;
2. Order filed June 15, 2021;
3. Form 4 Judgment, filed June 15, 2021;
4. Defendant's Motion and Exhibits filed June 25, 2021;
5. Plaintiff's Memorandum filed July 6, 2021;
6. Order filed December 30, 2021;
7. Form 4CE Order filed December 30, 2021;
8. Form 4C Judgment filed December 30, 2021;
9. June 2, 2021 Hearing Transcript
10. Plaintiff's Exhibits 2, 3<sup>1</sup>, and 4 from the June 2, 2021 Hearing.

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

Respectfully submitted,

s/ Benjamin A.C. Traywick

Benjamin A.C. Traywick, SC Bar #74027

Alexandra Scott Williams, SC Bar #102862

BEN TRAYWICK LAW FIRM, LLC

171 Church Street, Ste 340, Charleston, SC 29401

T: 843-872-1709 | F: 843-695-7839

ben@bentraywicklaw.com

ali@bentraywicklaw.com

*Attorneys for Appellant-Respondent*

July 25, 2022

Charleston, South Carolina

---

<sup>1</sup> Respondent introduced a complete copy of the invoices at the Hearing, but neither the Court nor the court reporter retained a copy. After representing to this Court that it would work cooperatively with Appellant to identify and agree upon a complete set of the missing exhibits, Respondent has ignored Appellant's efforts on these lines. As a result, this exhibit is the partial set of invoices that Appellant possesses, Respondent evidently preferring that this Court be denied the opportunity to evaluate the evidence Respondent itself presented at the Hearing.

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Jul 25 2022**

**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case No. 2019-CP-10-4053

Blind Acre, Inc., Respondent-Appellant,

v.

Stash Storage Holdings, Inc., Appellant-Respondent.

**PROOF OF SERVICE**

I hereby certify that on **July 25, 2022** a true and correct copy of the **APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served via email (see attached) on all counsel of record as follows:

G. Rutledge DuRant (SC Bar #: 73944)  
RIESEN DURANT LLC  
613 Long Point Road, Suite 100, Mount Pleasant, South Carolina 29464  
Phone: 843.800.0809 | Fax: 843.767.3282  
Email: rutledge@riesendurant.com

*Attorney for the Respondent-Appellant*

Respectfully submitted,

BEN TRAYWICK LAW FIRM, LLC

By: s/ Alexandra Scott Williams

Benjamin A. C. Traywick (SC Bar No. 74027)

Alexandra Scott Williams (SC Bar No. 102862)

*Attorneys for the Appellant-Respondent*

July 25, 2022

Charleston, South Carolina



Williams O'Neill, Alexandra <ali@bentraywicklaw.com>

---

## Blind Acre, Inc. v. Stash Storage Holdings, Inc. - Appellate Case No. 2022-000103

---

**Alexandra Williams** <ali@bentraywicklaw.com>

Mon, Jul 25, 2022 at 10:27 PM

To: Christina Sojourner <christina@riesendurant.com>, Rutledge DuRant <rutledge@riesendurant.com>

Cc: "Traywick, Ben" <ben@bentraywicklaw.com>, Teresa Cassaro <teresa@bentraywicklaw.com>

Rutledge-

Attached for service upon you please find:

1. APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S INITIAL BRIEF
2. DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL
3. DESIGNATED MATERIALS
4. PROOF OF SERVICE

We will be filing the same with the Court via email.

Thank you,  
Ali



### Alexandra Scott Williams O'Neill, Esquire





Ben Traywick Law Firm, LLC  
171 Church Street | Suite 340  
Charleston, South Carolina 29401  
P | 843.872.1709  
F | 843.695.7839  
[www.bentraywicklaw.com](http://www.bentraywicklaw.com)

CONFIDENTIALITY NOTICE: The information contained in this e-mail message is legally privileged and confidential information intended only for the use of the individual or entity to whom it is addressed. If the reader of this message is not the intended recipient, you are hereby notified that any use, dissemination, distribution or copy of this email message and attachments is strictly prohibited. If you have received this message in error, please immediately notify us by telephone and return email and delete the message in its entirety.

[Quoted text hidden]

---

#### 4 attachments

-  **22.07.25 INITIAL BRIEF of Stash Storage.pdf**  
213K
-  **22.07.25 DESIGNATION OF MATTER to be incl in Record on Appeal- Stash Storage.pdf**  
111K
-  **22.07.25 DESIGNATED MATERIALS COMBINED - Stash Storage.pdf**  
2577K
-  **22.07.25 PROOF OF SERVICE- Stash Storage Initial Brief & Designation.pdf**  
45K