

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Master in Equity

Marvin H. Dukes, III, Master in Equity  
Case No.: 2020-CP-07-01547

**RECEIVED**

**Sep 27 2022**

**SC Court of Appeals**

---

Appellate Case No. 2022-000301

---

Todd E. Taylor,.....Respondent,

v.

Amar and Kennie Gill Living Trust Dated March 15, 2019; Kennie Lee Miller Gill, Trustee of the Amar and Kennie Gill Living Trust Dated March 15, 2019; Kenneth V.L. Miller; and Anna M. Miller.....Appellants,

v.

South Beach Village Lagoon Villas II, Horizontal Property Regime LVII,  
.....Respondent.

---

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

---

In addition to the matters designated by Appellants to be included in the record on appeal, Respondent South Beach Village Lagoon Villas II, Horizontal Property Regime LVII (hereinafter “Regime”) designates the following matters:

**Pleadings, Motions, Supporting Memoranda & Other Filings and Materials**

1. Regime’s Petition for Relief Pursuant to S.C. Code Ann. § 33-31-160, dated August 25, 2021, with Exhibits;

2. Regime's Motion for Entry of Order Declaring Master Deed Valid and Lawful, dated March 31, 2022, with Exhibit A;

3. Affidavit of Todd Taylor dated November 12, 2021, with Exhibits;

4. Affidavit of John Elder dated November 12, 2021, with Exhibits;

5. Affidavit of Kenneth V.L. Miller dated November 10, 2021, with Exhibits;

6. Affidavit of Anna Miller dated November 10, 2021;

**Transcripts**

7. November 22, 2021 Hearing Transcript on Regime's Petition for Relief Pursuant to S.C. Code Ann. § 33-31-160.

Pursuant to Rule 209(c) of the South Carolina Appellate Court Rules, the undersigned hereby certifies that the above designation contains no matter that is irrelevant to the appeal.

Submitted this 27<sup>th</sup> day of September, 2022.

COPELAND, STAIR, VALZ & LOVELL, LLP

By: s/Lacey L. Houghton  
DOUGLAS W. MACKELCAN  
State Bar No.: 76332  
LACEY L. HOUGHTON  
State Bar No.: 102968

40 Calhoun Street, Suite 400  
Charleston, SC 29401  
*dmackelcan@csvg.law*  
*lhoughton@csvg.law*  
Ph: (843) 727-0307

***Attorneys for Respondent South Beach Village  
Lagoon Villas, II; Horizontal Property Regime  
LVII***

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Circuit Court Judge  
Case No.: 2020-CP-07-01547

**RECEIVED**

**Sep 27 2022**

**SC Court of Appeals**

---

Appellate Case No. 2022-000301

---

Todd E. Taylor,.....Respondent,

v.

Amar and Kennie Gill Living Trust Dated March 15, 2019; Kennie Lee Miller Gill, Trustee of the Amar and Kennie Gill Living Trust Dated March 15, 2019; Kenneth V.L. Miller; and Anna M. Miller.....Appellants,

v.

South Beach Village Lagoon Villas, II; Horizontal Property Regime LVII,  
.....Respondent.

---

**PROOF OF SERVICE**

---

I certify that I have served **Respondent Regime’s Designation of Matter to be Included in the Record on Appeal**, upon the parties below by depositing a copy of it in the United States Mail, postage prepaid and/or via electronic mail, on September 27, addressed as follows:

Edward M. Kubec  
State Bar No. 76576  
18 Executive Park Road, Suite 3  
Hilton Head Island, SC 29928  
[ekubec@coffeykubec.com](mailto:ekubec@coffeykubec.com)  
*Counsel for Respondent Todd E. Taylor*

Louis H. Lang, Esq.  
Callison Tighe & Robinson, LLC  
P.O. Box 1390  
Columbia, SC 29202  
[louislang@callisontighe.com](mailto:louislang@callisontighe.com)  
*Counsel for Appellants*

*[SIGNATURE PAGE TO FOLLOW]*

This 27<sup>th</sup> day of September, 2022.

COPELAND, STAIR, VALZ & LOVELL, LLP

40 Calhoun Street, Suite 400  
Charleston, SC 29401  
*dmackelcan@csvl.law*  
*lhoughton@csvl.law*  
Ph: (843) 727-0307

By: *s/Lacey L. Houghton*  
DOUGLAS W. MACKELCAN  
State Bar No.: 76332  
LACEY L. HOUGHTON  
State Bar No.: 102968

***Attorneys for Respondent South Beach Village  
Lagoon Villas, II; Horizontal Property Regime  
LVII***

6903353v.1

**From:** [Houghton, Lacey L.](#)  
**To:** ["ekubec@coffeykubec.com"](mailto:ekubec@coffeykubec.com)  
**Cc:** ["louislang@callisontighe.com"](mailto:louislang@callisontighe.com); [Mackelcan, Douglas W.](#); [Houghton, Lacey L.](#); [Moran, Rosie](#)  
**Subject:** Taylor v Gill v. South Beach Village Lagoon Villas, II HPR Regime LVII; Appellate Case No.: 2022-000301; CSVL File No.: 61574  
**Date:** Tuesday, September 27, 2022 2:45:00 PM  
**Attachments:** [image001.png](#)  
[Respondent's Initial Brief.pdf](#)  
[Respondent's Designation of Matter.pdf](#)

---

Good afternoon Ed,

On behalf of Attorneys Doug Mackelcan and Lacey Houghton, please find attached, Respondent's Initial Brief in this case, as well as Respondent's Designation of Matters, which we will file with the Court today.

Best regards,



**Teri Rewt**  
Legal Assistant II  
d: 843.329-8346 | f: 843.727.2995  
[trewt@csvl.law](mailto:trewt@csvl.law) | [www.csvl.law](http://www.csvl.law)  
40 Calhoun Street, Suite 400, Charleston, SC 29401

PLEASE NOTE change in Firm Name and email address