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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge, Circuit Court Judge

Appellate Case No.: 2022-000016
Case No.: 2018-CP-07-00911

Richard W. and Rebecca A. Drier, Sarmed and Jessica M. Shafi, *et al.*,

Plaintiffs,

v.

Advanced Flooring & Design Division of ISI, LLC f/k/a Advanced Flooring and Design, LLC, D.R. Horton, Inc., East coast Construction Cleanup Corp. f/k/a S.C. Cleanup Co., Inc., Hutton's Landscapes, Inc., Lather Construction SC, Inc., Lather Construction, Inc., *et al.*,

Defendants,

D.R. Horton, Inc.,

Appellant

v.

Sarmed and Jessica M. Shafi, East Coast Construction Cleanup Corp. f/k/a S.C. Cleanup Co., Inc., Hutton's Landscapes, Inc., and Lather Construction, Inc.

Respondents.

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

Respondent East Coast Construction Cleanup Corp. f/k/a SC Cleanup Co., Inc.
proposes the material in the attached Exhibit A be included in the Record on Appeal:

The undersigned hereby certifies this Designation contains no matter which is
irrelevant to this appeal.

CLAWSON and STAUBES, LLC

s/ Tyler E. Cloud

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Co., Inc.

Charleston, South Carolina
February 22, 2023

EXHIBIT A
PROPOSED DESIGNATION OF RECORD ON APPEAL

1. South Carolina Independent Contractor Agreement between East Coast and Horton dated November 30, 2012.
2. Horton Purchase Orders submitted to East Coast.
3. East Coast Notice of Motion and Motion for Summary Judgment as to Horton Crossclaims.
4. East Coast Memorandum in Support of its Motion for Summary Judgment.
5. Deposition Testimony of Olga Aquino, 18:15-19:13; 22:21-23; 25:14-25; 37:24-38:16.
6. Deposition Testimony of Ronald Bunner, 120:5-16, 129:15-17.
7. DR Horton Motion to Alter or Amend Judgment, filed November 24, 2021.
8. Transcript of Jury Trial, Hon. Bentley Price presiding, Tr. 91:10-99:20; Tr. V. II. Rev. 10:4-15; 32:23-53:10.