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Apr 21 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Case No. 2022-CP-23-00394

Audra Starnes,Respondent

v.

Craig Stoneburner and Citivest Corporation.....Appellants

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

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

1. Summary Judgment Order filed November 17, 2022
2. Rule 59 Order filed December 20, 2022
3. Order granting continuance filed August 22, 2022
4. Complaint filed September 7, 2021
5. Answer and Counterclaims dated October 27, 2021, with Transfer Letter dated November 30, 2021
6. Reply filed December 27, 2021
7. Plaintiff’s Motion for Summary Judgment filed August 5, 2022
8. Audra Starnes’ Affidavit filed August 5, 2022
9. Exhibits to Audra Starnes’ Affidavit
 - Exhibit A—Photographs of the property
 - Exhibit B—Photographs of Code Enforcement postings
 - Exhibit C—Screenshot of Craigslist ad
 - Exhibit D pgs. 1-39 (redacted) and pgs 40-58—Text Messages
10. All Code Enforcement records filed on August 5, 2022

11. Motion for Continuance filed August 19, 2022
12. Motion for Continuance filed October 19, 2022
13. Email exchange between the parties and the Trial Court dated October 19, 2022 regarding the 2nd continuance request
14. Plaintiff's Memorandum of Law Supporting Plaintiff's Motion for Summary Judgment filed October 18, 2022
15. Exhibits to Plaintiff's Memorandum of Law filed October 18, 2022
 - Exhibit 1—Lease agreement
 - Exhibit 2—Security deposit transmittal letter and envelope
 - Exhibit 3—Demand letter from Plaintiff's attorney and envelopes
 - Exhibit 4—Decision in Raynor v. Lucisano, 1985 Conn. Super. LEXIS 275 (Conn. Sup. Ct. July 31, 1985)
16. Defendants' Affidavit filed November 1, 2022
17. Plaintiff's Reply to Defendants' Affidavit filed November 7, 2022, with Exhibit A to that Reply
18. Defendants' Motion under Rules 52(b) and 59(e), SCRCF filed November 28, 2022
19. Plaintiff's Reply to Defendants' Motion under Rules 52(b) and 59(e), SCRCF filed December 13, 2022
20. Affidavit of Service on Craig Stoneburner and Citivest filed November 16, 2021

Appellant's counsel hereby certifies that this Designation contains no matter which is irrelevant to the appeal.

Respectfully Submitted,

SOUTH CAROLINA LEGAL SERVICES

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