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Apr 26 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2022-001162
Civil Action No. 2017-CP-10-04112

CHRIS KHAMNEI,

Appellant,

v.

COLUMBUS STREET HOLDINGS,
LLC; ROY T. WILLEY, IV; AND ERIC
M. POULIN,

Respondents.

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

Respondents propose the following be included in the Record on Appeal. Where Respondents request a filing, they do not request any attachments or exhibits to that filing unless specifically stated otherwise.

1. Signed Agreement/Contract: To Buy and Sell Real Estate (Residential) (Form 310)
2. Signed State of South Carolina Residential Property Condition Disclosure Statement
3. Addendum/Amendment to Agreement/Contract to Buy and Sell Real Estate, signed April 14, 2017
4. Summons and Complaint, filed August 11, 2017
5. Amended Complaint, filed September 5, 2017

6. Answer and Counterclaims, filed September 13, 2017
7. Order Granting Defendants' Motion for Partial Dismissal in Part, filed December 14, 2017
8. Summons and Complaint in Case No. 2018-CP-10-01622, filed March 30, 2018
9. Order Granting Defendants' Motion to Compel, filed April 16, 2018
10. Notice of Appearance, Louis S. Moore for the Plaintiff Chris Khamnei, filed October 12, 2018
11. Order Granting Defendant's Motion to Strike and Denying Plaintiff's Motion to Enlarge Time, filed October 22, 2018
12. Notice of Pro Se Appearance, filed September 13, 2019
13. Amended Summons and Complaint, filed January 6, 2020
14. Order Granting Defendant's Motion to Dismiss or Strike Plaintiff's Amended Complaint, July 30, 2020
15. Order Cancelling *Lis Pendens* and Compelling Mediation, filed February 9, 2021
16. Proof of ADR or Exemption, filed February 18, 2021
17. Plaintiff's Motion to Set Aside Mediated Settlement Agreement, filed July 29, 2021
18. Affidavit of Plaintiff Chris Khamnei in Support of Motion to Set Aside Mediated Settlement Agreement, filed July 29, 2021
19. Transcript of Record, February 28, 2022
20. Notice of Intrafirm Transfer of File, filed March 14, 2022
21. Docket in Case No. 2018-CP-10-01622, through March 22, 2022
22. Order Denying Plaintiff's Motion to Set Aside Mediated Settlement Agreement, filed March 22, 2022
23. Plaintiff's Motion to Reconsider Order Denying Motion to Set Aside Mediated Settlement Agreement (including Certificate of Service and Cover Letter), filed April 25, 2022
24. Order Denying Plaintiff's Motion to Reconsider, filed June 28, 2022
25. Notice of Appeal, Proof of Service and Cover Letter (including envelope), filed August 16, 2022

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

April 26, 2023

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

Angeline M. Larrivee (S.C. #105466)

32 Ann Street

Charleston, SC 29403

(803) 222-2222

angeline.larrivee@akimlawfirm.com

Attorney for Respondents

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PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Respondents' Designation of Matter on Appellant by Electronic Mail and by placing a copy in the U.S. Mail, postage prepaid, on April 26, 2023, addressed to Appellant, Chris Khamnei, 82 Overlake Park, Burlington, VT 05401.

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee
Angeline M. Larrivee (S.C. # 105466)
32 Ann Street
Charleston, SC 29403
(803) 222-2222
angeline.larrivee@akimlawfirm.com
Attorney for Respondents

TOLL FREE: 1(800) 313-2546
FACSIMILE: (843) 494-5536

POULIN | WILLEY ANASTOPOULO

AKIM A. ANASTOPOULO (SC)
ERIC M. POULIN (SC)(GA)(NC)(CA)
ROY T. WILLEY, IV (SC)(KY)(NJ)

REPLY TO ANN STREET OFFICE
TILD@AKIMLAWFIRM.COM

Transportation & Insurance Liability Division

April 26, 2023

VIA U.S. MAIL and E-MAIL ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Chris Khamnei v. Columbus Street Holdings, LLC (2)*
Appellate Case No.: 2022-001162

*OF COUNSEL

Dear Ms. Kitchings:

Attached for filing, please find Respondents' Initial Brief and Respondents' Designation of Matter with their associated proofs of service. Please let us know if you need any additional information.

Sincerely,

s/Angeline Larrivee

Cc: Chris Khamnei

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