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**May 01 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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IN THE COURT OF COMMON PLEAS  
13<sup>th</sup> Judicial Circuit

Letitia H. Verdin, Circuit Court Judge

Case No.: 2019-CP-39-01224

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Appellate Case No.: 2022-001777

Christopher Young and Biotech Restorations, LLC,

Appellants/Respondents,

v.

Joanna Marie Paynter, a/k/a Joey Paynter,  
Samantha P. Nelson, and Paynter Consulting, LLC,

Respondents/Appellants.

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Wesley D. Few (S.C. Bar # 15565)  
Wesley D. Few, LLC  
Post Office Box 9398  
Greenville, SC 29604  
(864) 527-5906 | [wes@wesleyfew.com](mailto:wes@wesleyfew.com)

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

Appellants Christopher Young and Biotech Restorations, LLC hereby supplement the Designation of Matter filed earlier related to their Appeal and designate the following additional documents to be included in the Record on Appeal:

- 1) Handwritten Agreement, Nov. 19, 2004, 1 pages (Pltf's Trial Ex. 1);
- 2) General Partnership Agreement, Jan. 10, 2006, 2 pages (Pltf's Trial Ex. 2);

- 3) General Partnership Agreement, May 30, 2006, 2 pages (Pltf's Trial Ex. 3);
- 4) Order to Arbitrate, Feb. 16, 2016 (Pltf's Trial Exhibit 4);
- 5) Letter from Probate Judge, Mar. 5, 2018 (Pltf's Trial Exhibit 5);
- 6) Trial Transcript, April 20-21, 2022;
- 7) Protective Order (via Special Referee), filed Aug. 17, 2020;
- 8) Order of Default by Paynter Consulting, LLC, filed June 14, 2021;
- 9) Status Conference Transcript, Aug. 11, 2022;
- 10) Amended Order Construing General Partnership Agreement, Nov. 17, 2022;
- 11) Form 4 Order, filed Dec. 12, 2022 (9:11 A.M.);
- 12) Judgment, filed Dec. 13, 2022 (12:51 P.M.);
- 13) Declaration of Joanna Paynter, May 19, 2020 (filed May 20, 2020);
- 14) Judicial Notice of Case No. 2015-CP-39-01006;
- 15) Judicial Notice of Case No. 2017-ES-39-00607 (Probate File, 65 pages);
- 16) Judicial Notice of Case No. 8:15-cv-03778-TMC;
- 17) Dissolution of Paynter Consulting, LLC, filed Jan. 21, 2020 (S.C. Sec. of State);
- 18) Plaintiffs' Motion to Reconsider, filed Nov. 11, 2022;
- 19) Plaintiffs' Motion for Partial Summary Judgment, Fraudulent Conveyance, filed Apr. 13, 2022 (Exhibits 1-13);
- 20) Declaration of Eric K. Englebardt, Esquire, filed April 24, 2020;
- 21) Motion for Default Judgment Samantha Nelson, filed Feb. 5, 2020;
- 22) Memorandum in Support of Default, filed April 28, 2020 (Exhibits A-D);and
- 23) Motion for Default Judgment Paynter Consulting, LLC, filed June 24, 2020, 2020;
- 24) Proof of ADR, filed June 29, 2021;

Respectfully submitted,

/s/ Wesley D. Few

Wesley D. Few, LLC

Post Office Box, 9398

Greenville, SC 29604

(864) 527-5906 | [wes@wesleyfew.com](mailto:wes@wesleyfew.com)

ATTORNEYS FOR APPELLANTS /  
RESPONDENTS CHRISTOPHER YOUNG AND  
BIOTECH RESTORATIONS, LLC

Greenville, South Carolina  
May 1, 2023