

**THE STATE OF SOUTH CAROLINA**  
In The Court of Appeals

---

**APPEAL FROM PICKENS COUNTY**  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

---

Case No. 2019-CP-3901224  
Appellate Case No. 2022-001777

---

Christopher Young and Biotech Restorations, LLC

Appellants/Respondents,

v.

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

Respondents/Appellants.

---

**CROSS-APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

---

Cross-Appellants Paynter and Nelson designate the following items to be included in the record on appeal:

1. Defendants' Exhibit 10, 9/13/16 Aff. of Dr. Kline;
2. Plaintiffs' Exhibit 2, 1/16/06 General Partnership Agreement;
3. Plaintiffs' Exhibit 3, 5/30/06 General Partnership Agreement;
4. Death Certification for Dr. Valerie Paynter;
5. Statement of Creditor's Claim;
6. Notice of Disallowance of Claim;
7. Order Closing Estate;

**RECEIVED**  
**May 11 2023**  
SC Court of Appeals

8. Summons and Complaint filed September 11, 2019;
9. Answer filed January 28, 2020;
10. Acceptance of Service, January 19, 2021;
11. Amended Complaint filed February 22, 2021;
12. Answer to Amended Complaint filed March 8, 2021;
13. Amended Answer and Counterclaim filed September 14, 2021;
14. Answer to Counterclaim filed September 28, 2021;
15. Trial Transcript, pp. 16-20, 93, 125-127, 136, 139, 142-145, 195, 239, 243, 276-277;
16. Order Construing the General Partnership Agreement entered November 10, 2022;
17. Plaintiffs' Motion for Reconsideration of the Order filed November 10, 2022;
18. Order Construing the General Partnership Agreement entered November 17, 2022
19. Order on Plaintiffs' Motion to Reconsider entered November 17, 2022;
20. Plaintiffs' Motion under Rule 60 filed November 28, 2022;
21. Order on Motion under Rule 60 entered December 12, 2022;
22. Judgment entered December 13, 2022;
23. Appellants/Respondents' Notice of Appeal;
24. Cross-Appellants' Notice of Cross-Appeal;
25. Plaintiffs' Responses to Request to Admit 1;
26. 5/8/20 Amended Verified Petition for Subsequent Administration;
27. 5/29/20 Response to Petition Subsequent Administration;
28. January 13, 2023 letter to Clerk regarding deficiencies;

29. Plaintiffs' Response To Defendants Third Request For Production;
30. 5/26/20 Declaration of Joanna Marie Paynter;
31. Articles of Termination dated 1-21-20;
32. Operating Agreement of Paynter Consulting, LLC dated February 2, 2006;
33. 8-11-22 Transcript of Hearing;
34. 3-5-18 Probate Judge letter
35. 2-6-22 Motion for Summary Judgement with Exhibits

The undersigned hereby certifies, pursuant to Rule 209(c), SCACR, that Cross-Appellants' Designation of Matter to be included in the Record on Appeal contains no matter that is irrelevant to the appeal.

Respectfully submitted,

s/Steven R. LeBlanc  
Steven R. LeBlanc (SC Bar 14221)  
Steve LeBlanc, LLC  
P.O. Box 9198  
Greenville, S.C. 29604  
Tel: (864) 902-4411  
Steve@LeBlancLLC.com

***Attorneys for Respondents/Cross-Appellants***

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

---

Case No. 2019-CP-3901224  
Appellate Case No. 2022-001777

---

Christopher Young and Biotech Restorations, LLC

Appellants/Respondents,

v.

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

Respondents/Appellants.

---

**PROOF OF SERVICE**

---

I certify that on May 11, 2023, I filed a **Cross-Appellants' Initial Brief** with the South Carolina Court of Appeals and served a copy on all counsel of record by email as demonstrated by the attached email.

Respectfully submitted,

s/Steven R. LeBlanc  
Steven R. LeBlanc (SC Bar 14221)  
Steve LeBlanc, LLC  
P.O. Box 9198  
Greenville, S.C. 29604  
Tel: (864) 902-4411  
Steve@LeBlancLLC.com

*Attorneys for Respondents/Cross-Appellants*

**RECEIVED**

**May 11 2023**

**SC Court of Appeals**

## Kim Parker

---

**From:** Kim Parker  
**Sent:** Thursday, May 11, 2023 6:29 PM  
**To:** Wes Few; Cassy G. Young  
**Cc:** Steven LeBlanc  
**Subject:** FW: PAYNTER / REPLY BRIEF  
**Attachments:** 5-11-23 Reply Brief.pdf; 5-11-23 Cross-Appellants' DOM.pdf; 5-11-23 POS .pdf

Wes, please see attached being filed today. Thank you,

Kim Parker  
Administrative Assistant



Steve LeBlanc  
P.O. Box 9198  
Greenville, SC 29604  
1864) 902-4411

**RECEIVED**

**May 11 2023**

**SC Court of Appeals**