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**Jun 15 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

IN THE COURT OF COMMON PLEAS  
Thirteenth Judicial Circuit

Letitia H. Verdin, Circuit Court Judge

Case No.: 2019-CP-39-01224

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.

Wesley D. Few (S.C. Bar # 15565)  
Wesley D. Few, LLC  
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**APPELLANTS / RESPONDENTS DESIGNATION OF  
MATTER TO BE INCLUDED ON THE RECORD OF APPEAL**

Appellants Christopher Young and Biotech Restorations, LLC designate the following 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;
- 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); and
- 20) Plaintiffs' Amended Verified Petition for Subsequent Administration, Removal of Personal Representative and to Appoint Special Administrator, Form 334ES and Amended Summons and Complaint, filed May 8, 2020 (Pickens County Probate Court).

Respectfully submitted,

/s/ Wesley D. Few  
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BIOTECH RESTORATIONS, LLC

Greenville, South Carolina  
June 15, 2023