

The South Carolina Court of Appeals

Bank of Newington, Appellant-Respondent,

v.

LHSC, Inc., Williamsburg County Development Corporation,
Viking Fire Protection, Inc. of the Southeast, and HBC, Inc., Defendants,

of which Williamsburg County Development Corporation
and HBC, Inc. are the Respondents-Appellants,

AND

HBC, Inc., Cross-Claimant, Respondent-Appellant,

v.

LHSC, Inc., Cross-Claim Defendant,

AND

HBC, Inc., 3rd Party Plaintiff, Respondent-Appellant,

v.

Louis Hornick, II, and Blake Fickling, 3rd Party Defendants,

AND

Williamsburg County Development Corporation, CrossClaimant,
Respondent-Appellant,

v.

LHSC, Inc., Cross-Claim Defendant,

AND

Williamsburg County Development Corporation, 3rd Party Plaintiff,
Respondent-Appellant,

v.

Louis Hornick, II, and Blake Fickling, 3rd Party Defendants.

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SC Court of Appeals

Appellate Case No. 2023-001087

The Honorable R. Ferrell Cothran, Jr.
Williamsburg County
Trial Court Case No. 2018CP4500258

DESIGNATION OF MATTER TO BE INCLUDED IN THE APPEAL BY
WILLIAMSBURG COUNTY DEVELOPMENT CORPORATION

2019-CP-45-00325:

9/25/2019 Default Judgment;

2018-CP-45-00258:

4/16/2021 Order;

8/17/2019 Order;

Complaint;

2019-CP-00193

3/10/2022 Foreclosure Decree;

3/13/2023 Order;

3/22/2023 Order;

6/2/2023 Amended Order;

7/25/2023 Order;

Complaint;

4/24/2019 Viking Answer;

4/29/2019 WCDC Answer;

6/3/2019 HBC Answer, Counterclaim, Crossclaim and 3rd-party Complaint;

12/12/2022 WCDC Am. Answer, Counterclaim, Crossclaim and 3rd-party Complaint;

3/13/2023 BON execution motion;

3/13/2023 BON interest motion;

3/22/2023 BON Rules 52 and 59 motion;

5/10/2023 email from Mr. Jenkinson to the court and counsel showing attachments in opposition to BON post-trial motions;

5/10/2023 WCDC/HBC Joint Return to BON Motion (54 pages) with attached Exhibits A and B;

5/11/2023 WCDC/HBC Joint Return to BON Motion (4 pages);

5/11/2023 email from Mr. Willcox to court and counsel showing attachments submitted;

6/12/2023 WCDC Rule 59 motion;

6/28/2023 BON Memorandum opposing WCDC Motion;

8/2/2023 HBC Rule 59 motion;

Tr. Vol. 1, 1/23/2023;

Tr. Vol. 2, 1/24/2023;

Tr. Vol. 3, 1/25/2023;

Tr. 5/12/2023;

Tr. 6/29/2023;

BON Exhibit 6;

BON Exhibit 37;

BON Exhibit 38;

HBC Exhibit 2;

HBC Exhibit 3

HBC Exhibit 7;

HBC Exhibit 10;

HBC Exhibit 14;

HBC Exhibit 26

HBC Exhibit 34;

HBC Exhibit 35;

HBC Exhibit 43;

WCDC Exhibit 1;

WCDC Exhibit 2;

WCDC Exhibit 3A;

WCDC Exhibit 3B;

WCDC Exhibit 5;

WCDC Exhibit 6;

WCDC Exhibit 7;
WCDC Exhibit 8;
WCDC Exhibit 9;
WCDC Exhibit 10;
WCDC Exhibit 23
WCDC Exhibit 25;
WCDC Exhibit 26;
WCDC Exhibit 27;
WCDC Exhibit 28;
WCDC Exhibit 33;
WCDC Exhibit 34;
WCDC Exhibit 35;
6/29/2023 BON Notice of Appeal;
7/26/2023 WCDC Notice of Appeal;
7/26/2023 HBC Notice of Appeal;
8/23/2023 BON Amended Notice of Appeal;

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CERTIFICATE OF COMPLIANCE

Undersigned certifies that this Designation contains no matter which is irrelevant to the appeal.

s/ W.E. Jenkinson, III
W.E. Jenkinson, III
Jenkinson, Kellahan, Thompson & Reynolds, PA
Post Office Drawer 669
Kingstree, SC 29556
Ph. (843) 355-2000
*Attorney for Respondent-Appellant Williamsburg
County Development Corporation*

Kingstree, SC
November 6, 2023

The South Carolina Court of Appeals

Bank of Newington, Appellant-Respondent,
 v.
 LHSC, Inc., Williamsburg County Development Corporation,
 Viking Fire Protection, Inc. of the Southeast, and HBC, Inc., Defendants,
 of which Williamsburg County Development Corporation
 and HBC, Inc. are the Respondents-Appellants,
 AND
 HBC, Inc., Cross-Claimant, Respondent-Appellant,
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 AND
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PROOF OF SERVICE

Undersigned certifies that the above Designation of Matter to be included be included in the Appeal by Williamsburg County Development Corporation was filed electronically and served electronically and by regular U.S. mail on November 6, 2023 to all parties as follows:

Wesley D. Few,
 Wesley D. Few, LLC
 Post Office Box 9398
 Greenville, South Carolina 29604
 wes@wesleyfew.com
Attorney for HBC, Inc

Walker H. Willcox
 WILLCOX, BUYCK, & WILLIAMS, P.A.
 P.O. Box 1909
 Florence, SC 29503-1909
 wwillcox@willcoxlaw.com
*Attorney for Bank of Newington and Blake
 Fickling*

s/W. E. Jenkinson, III



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ATTORNEYS AT LAW

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TELEPHONE (843) 355-2000 • FACSIMILE (843) 355-2010 • TOLL FREE 1-888-354-7417
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W. E. Jenkinson, III
Jennifer R. Kellahan*
J. Thomas Thompson
William Evan Reynolds

Hannah S. Heathcott

*Certified Circuit Court Mediator

November 6, 2023

VIA EMAIL AND US MAIL:

ctappingfilings@sccourts.org

The Honorable Jenny Abbott Kitchings

South Carolina Court of Appeals

PO Box 11629

Columbia, SC 29211

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SC Court of Appeals

RE: Bank of Newington v. LHSC, Inc., et al.
Case Nos.: 2019-CP-45-00193 and 2018-CP-45-00258
Appellate Case No. 2023-001087

Dear Ms. Kitchings,

Please find attached hereto the Initial Brief of Respondent/Appellant, Williamsburg County Development Corporation and Designation of Matter to be Included in the Appeal by Williamsburg County Development Corporation along with proof of service. Please note that a copy is being mailed as well.

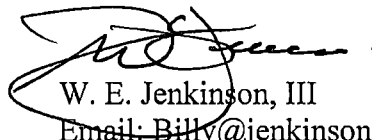
By copy of this letter to Walker Willcox, attorney for Appellant Bank of Newington, and Wesley D. Few, attorney for the Respondent HBC, Inc. I am serving them with copies of the same.

If you have any questions or need additional information, please do not hesitate to contact me.

Thanking you for your consideration, I am

Very truly yours,

Jenkinson, Kellahan, Thompson & Reynolds, PA




W. E. Jenkinson, III
Email: Billy@jenkinsonlaw.com

WEJ/lis

Enclosure(s): as stated

Cc: Wesley D. Few, Esquire – via email and US Mail
Walker H. Willcox, Esquire – via email and US Mail

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 JENKINSON, KELLAHAN, THOMPSON & REYNOLDS, PA
ATTORNEYS AT LAW
POST OFFICE DRAWER 669 • KINGSTREE, SOUTH CAROLINA 29556

To: The Honorable Jonny Abbott Kitchings
South Carolina Court of Appeals
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