

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Edgar W. Dickson, Circuit Court Judge  
Civil Action No. 2021-CP-10-01343

Appellate Case No. 2023-001779

Andrew Pampu; Amanda Pampu; and John Pampu, ..... Appellants

v.

Clawson Fagnoli, LLC; Samuel R. Clawson, Jr., Esq.; Christina R. Fagnoli, Esq.; Barrett R. Brewer, Esq.; and Brewer Law Firm, LLC..... Respondents

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

Pursuant to South Carolina Rule of Appellate Procedure 209, Respondents jointly propose that the following documents be included in the record on appeal:

1. Letter of Representation from Thomas Pendarvis (September 19, 2019)
2. Letter of Representation from Thomas Pendarvis (February 26, 2021)
3. Complaint (March 19, 2021)
4. Plaintiff’s Motion to Proceed Anonymously Under Pseudonyms (March 19, 2021)
5. Amended Complaint (April 30, 2021)
6. Expert Affidavit by Justin Dillon, Esq. (April 30, 2021)
7. Clawson Fagnoli Motion to Dismiss Amended Complaint (May 9, 2021)
8. Clawson Fagnoli Motion to Prohibit Plaintiffs from Using Pseudonyms (May 9, 2021)
9. Brewer Motion to Dismiss Amended Complaint (May 10, 2021)
10. Brewer Motion to Unmask Plaintiffs Using Pseudonyms (May 10, 2021)
11. Second Amended Complaint (June 16, 2021)
12. Clawson Fagnoli Answer to Second Am. Compl. and Counterclaims (June 28, 2021)
13. Clawson Fagnoli Motion to Dismiss Second Am. Compl. (June 28, 2021)
14. Brewer Answer to Second Am. Compl. and Counterclaims (June 30, 2021)
15. Brewer Motion to Dismiss Second Am. Compl. (June 30, 2021)
16. Plaintiff’s Reply to Brewer Counterclaims (July 28, 2021)
17. Plaintiff’s Reply to Clawson Fagnoli Counterclaims (July 28, 2021)
18. Defendants’ Joint Memorandum in Support of Motion to Dismiss Second Am. Compl. (October 22, 2021)

19. Plaintiff's Combined Memorandum in Opposition to Motions to Dismiss Second Am. Compl. (December 15, 2021)
20. Transcript of Hearing on Motions to Dismiss and Motions to Prohibit Pseudonyms (March 2, 2022)
21. Order Granting Motions to Prohibit Pseudonyms (March 4, 2022)
22. Order Granting Brewer Motion to Dismiss (June 23, 2022)
23. Order Granting Clawson Fagnoli Motion to Dismiss (June 23, 2022)
24. Motion for Reconsideration and to Alter or Amend the Orders Granting Defendants' Motions to Dismiss (July 5, 2022)
25. Email from Thomas Pendarvis regarding statements made in Plaintiffs' Motion for Reconsideration (January 18, 2023)
26. Order Denying Motion for Reconsideration and to Alter or Amend the Orders Granting Defendants' Motions to Dismiss (October 23, 2023)
27. Notice of Appeal (November 14, 2023)
28. Email from Thomas Pendarvis regarding status of Respondents' pending counterclaims (March 25, 2024)

The undersigned certify that the foregoing Designation contains no matter which is irrelevant to the appeal.

April 12, 2024

/s/ Emily E. Seaton

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