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Oct 10 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

The Honorable Thomas L. Hughston, Jr.

Appellate Case No.: 2024-000632
Case No.: 2020-CP-33-00277

Bevance Lynch Respondent,

vs.

Bertha E. Dunham Appellant.

**RESPONDENT'S DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondent Bevance Lynch designates the following additional materials for inclusion in the record on appeal.

- 1) Dunham's Notice of Appeal dated April 17, 2024;
- 2) Judge Hughston's Order dated April 17, 2024;
- 3) Dunham's Motion to Reconsider dated December 10, 2023;
- 4) Judge Hughston's Order dated December 4, 2023;
- 5) Dunham's Motion to Leave to Amend dated November 29, 2023;
- 6) Dunham's Amended Answer and Counterclaim dated November 29, 2023;
- 7) Affidavit of Beulah Belin dated August 17, 2023;

- 8) Dunham's filed Lis Pendens dated August 17, 2023;
- 9) Order of Continuance dated August 28, 2023;
- 10) Order of Protection dated November 27, 2023;
- 11) Lynch's Motion for Summary Judgment with Exhibits dated July 5, 2023;
- 12) Certificate of Transmittal dated June 2, 2023;
- 13) Filed Notice to Quit dated May 21, 2020;
- 14) Affidavit of Landowner dated May 20, 2020;
- 15) Dunham's Answer dated May 29, 2020;
- 16) Lynch's filed Deed dated March 2020;
- 17) Dunham's filed Deed dated November 1975;
- 18) Wilmington Savings Fund Society's Foreclosure Deed dated August 2019;
- 19) Transcript of Hearing on November 29, 2023.

Pursuant to Rule 209(c) of the South Carolina Appellate Court Rules, the undersigned counsel certifies that this designation contains no matter which is not relevant to the appeal.

October 10, 2024

/s/ J. Jakob Kennedy
J. Jakob Kennedy (S.C. Bar No. 72619)
KENNEDY LAW OFFICE, LLC
109 East Dozier Street
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(843) 423-5555
Attorney for Respondent

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PROOF OF SERVICE

I hereby certify that I have served the foregoing **RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** upon counsel for the Appellant, Paul B. Ferrara, III, who is a lawyer admitted to practice law in South Carolina by using his primary e-mail address of paul@ferraralawfirm.net as listed in the Attorney Information system (AIS). A copy of the e-mail is attached on the next page.

October 10, 2024

/s/ J. Jakob Kennedy
J. Jakob Kennedy
S.C. Bar No. 72619
109 East Dozier Street
Post Office Box 925
Marion, SC 29571
(843) 423-5555
Attorney for Respondent

From: Jake Kennedy jake@kennedysc.com 
Subject: Appellate Case No.: 2024-000632 Lynch v. Dunham
Date: October 10, 2024 at 11:42 AM
To: Paul Ferrara paul@ferraralawfirm.net

JK

Paul - please see the attached: (1) Motion for Extension of Time; (2) Respondent's Designations of Matter to be Included in the Record on Appeal; and (3) Initial Brief of Respondent. This email is being sent to your AIS registered email and for the purposes of serving these documents in compliance with Supreme Court Order (2020-000447) section (d)(1).

Motion for Extension of Time.pdf



Respondent's Designation of
Matter.pdf



Initial Brief of Respondent.pdf



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Attorney

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