

**RECEIVED**

**Dec 18 2024**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Lancaster County  
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

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Case No. 2022-CP-29-00240  
Appellate Case No. 2023-001980

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Jenna Robbins,

Appellant,

v.

IMF13, LLC d/b/a The Indigo at Cross Creek, Taft Management Group, Taft Family Ventures, Southern-eez Landscaping, LLC, and Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping,

of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

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**DESIGNATION OF MATTERS TO BE INCLUDED  
IN THE RECORD ON APPEAL BY RESPONDENT**

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CLEMENT RIVERS, LLP  
Catherine H. Chase (SC Bar No. 74593)  
Graydon V. Olive, IV (SC Bar No. 105319)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402-0993)  
Charleston, South Carolina 29401  
(843) 720-5488  
cchase@ycrlaw.com  
golive@ycrlaw.com

*\*additional counsel listed on next page*

*and*

WOLFE, GUNST & HINSON, PLLC

Brian E. Wolfe (SC Bar No. 77463)

Robert C. Gunst, Jr. (SC Bar No. 102957)

Joshua R. Hinson (SC Bar No. 102270)

215 Queens Road, Suite 200

Charlotte, NC 28204

(704) 827-3774

[bwolfe@wolfegunst.com](mailto:bwolfe@wolfegunst.com)

[rgunst@wolfegunst.com](mailto:rgunst@wolfegunst.com)

[jhinson@wolfegunst.com](mailto:jhinson@wolfegunst.com)

*Attorneys for Respondent*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Respondent Southern Horticulture Group, LLC d/b/a Southern-eez

Landscaping proposes the following to be included in the Record on Appeal:

**Orders, Judgments, Decrees, or Decisions**

1. Order of Referral, dated June 17, 2022;
2. Order Granting Motion to Intervene, filed August 2, 2022;
3. Order Denying Ms. Robbins's Rule 60(a) Motion, filed August 4, 2022;
4. Special Referee Order, dated August 15, 2022;
5. Circuit Court Order, dated November 21, 2023;

**Pleadings**

6. Complaint, filed March 3, 2022;
7. Answer, Counterclaim, and Crossclaim, filed August 4, 2022;
  - a. Exhibit A;

**Motions, other Court Filed Documents**

8. Affidavit of Service, filed April 22, 2022;
9. Motion for Entry of Default, filed June 16, 2022;
10. Entry of Default, filed June 16, 2022;
11. Motion to Intervene, filed July 11, 2022;
12. Motion to Amend, filed August 23, 2022;
13. Motion to Dismiss, filed September 2, 2022;
14. Motion for Protective Order, filed September 2, 2022;

15. Motion to Compel, filed November 11, 2022;
16. Notice of Motion Scheduling – Motion/Protection from Discovery, Motion/Alter and/or Amend, and Motion/Dismiss, dated July 28, 2023;

**Other materials or documents**

17. Tyger River Letter, dated June 29, 2022, and enclosures;
18. Gunst e-mail;
19. Negrin Affidavit, dated July 8, 2022;
20. Gunst Affidavit, dated July 8, 2022; and
  - a. Exhibit J.

I certify that this Designation of Matters contains no matter which is irrelevant to this appeal.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/ Catherine H. Chase

Catherine H. Chase (SC Bar No. 74593)  
Graydon V. Olive, IV (SC Bar No. 105319)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402-0993)  
Charleston, South Carolina 29401  
(843) 720-5488  
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[bwolfe@wolfegunst.com](mailto:bwolfe@wolfegunst.com)

[rgunst@wolfegunst.com](mailto:rgunst@wolfegunst.com)

[jhinson@wolfegunst.com](mailto:jhinson@wolfegunst.com)

*Attorneys for Respondent*

Charleston, South Carolina

Dated: December 18, 2024