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**SC Court of Appeals**

**FORM 14  
DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

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

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**APPEAL FROM OCONEE COUNTY  
COURT OF COMMON PLEAS**

**R. Lawton McIntosh, Circuit Judge  
Common Pleas Case No. 2022-CP-37-00182**

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**Appellate Case No. 2024-000739**

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**Dorothy Pierce,**

**Appellant,**

**v.**

**Richard Hunt McDuff; MJM Law LLC,**

**Respondents.**

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

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*Attorneys for Richard Hunt McDuff  
and MJM Law, LLC*

Respondents propose the following be included in the Record on Appeal:

1. Summons and Complaint filed March 15, 2022;
2. Amended Complaint filed March 17, 2022;
3. Defendant Richard Hunt McDuff and MJM Law, LLC's Motion to Dismiss Plaintiff's Complaint filed April 14, 2022;
4. Defendant Richard Hunt McDuff and MJM Law, LLC's Memorandum in Support of Their Motion to Dismiss Plaintiff's Complaint filed May 27, 2022 and Exhibits "A"- "I" thereto;
5. Plaintiff's Opposition to Defendants Richard Hunt McDuff's and MJM Law, LLC's Motion to Dismiss Plaintiff's Complaint and Amended Complaint filed June 1, 2022;
6. Oconee County Common Pleas Court Hearing Cover Sheet on Defendants' Motion to Dismiss filed June 1, 2022;
7. Form 4 Order Granting in part and Denying in Part Defendants' Motion to Dismiss filed June 3, 2022;
8. Defendants Richard Hunt McDuff and MJM Law, LLC's Answer to Plaintiff's Complaint and Amended Complaint filed June 14, 2022;
9. Motion for Admission Pro Hac Vice of Kenan G. Loomis, Esq. filed June 14, 2022;
10. Formal Order Granting in Part and denying in Part Defendants Richard Hunt McDuff's and MJM Law, LLC's Motion to Dismiss Plaintiff's Complaint and Amended Complaint filed July 14, 2022.
11. Order Granting Kenan G. Loomis Motion for Admission Pro Hac Vice filed August 31, 2022;

12. Defendant Richard Hunt McDuff's Motion to Compel Plaintiff's Discovery Responses filed January 3, 2023;
13. Memorandum of Law in Support of Defendant Richard Hunt McDuff's Motion to Compel Plaintiff's Discovery Responses and Exhibits "A" – "I" thereto filed January 25, 2023;
14. Order on Defendants' Motion to Compel filed February 13, 2023;
15. The Journal Defendants' Motion for Sanctions filed March 3, 2023;
16. Defendant Richard Hunt McDuff's Motion for Sanctions filed March 15, 2023;
17. Memorandum of Law in Support of the Journal Defendants' Motion for Sanctions and Exhibits "A" – "G" thereto filed March 16, 2023;
18. Defendant Richard Hunt McDuff's Memorandum of Law in Support of His Motion for Sanctions and Exhibits "A"—"H" thereto filed March 20, 2023;
19. Form 4 Order Granting the Journal Newspaper's, Richard Hunt McDuff and MJM Law LLC's Motion for Sanctions filed March 22, 2023;
20. Formal Order Granting Defendants' Motion for Sanctions filed April 4, 2023;
21. Formal Order Denying Plaintiff's Motion to Reconsider the Court's April 4, 2023 Order Granting Defendants' Motions for Sanctions filed September 1, 2023;
22. Attorney Defendants' Motion for Summary Judgment filed November 21, 2023;
23. Affidavit of Richard Hunt McDuff filed December 6, 2023;
24. Affidavit of Riley Morningstar filed January 11, 2024;
25. Defendants Richard Hunt McDuff and MJM Law, LLC's Memorandum of Law in Support of Their Motion for Summary Judgment and Opposition to Plaintiff's Amended Motion for Summary Judgment and Exhibits "1"- "23" thereto filed

January 12, 2024;

26. Form 4 Order denying Plaintiff's Amended Motions for Summary Judgment as to all Defendants and Granting McDuff's Motion for Summary Judgment filed March 20, 2024;
27. Notice of Electronic Filing of Proposed Summary Judgment Order filed March 26, 2024;
28. Appellant's Notice of Appeal filed March 29, 2024;
29. Formal Order on Defendants Richard Hunt McDuff and MJM Law LLC's Motion for Summary Judgment dated April 2, 2024;
30. Appellant's Motion to Vacate Order on Defendants Richard Hunt McDuff and MJM Law, LLC's Motion for Summary Judgment Dated April 2, 2024 and Request for Rehearing, filed July 19, 2024; and
31. Form 4 Order denying Plaintiff's Motion to Vacate as Improper filed January 28, 2025.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respondents reserve the right to supplement this designation as necessary.

March 7, 2025

s/ Charles A. Kinney  
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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on this 7th day of March, 2025, he electronically filed the foregoing **Respondents Richard Hunt McDuff's and MJM Law, LLC's Designation of Matter to Be Included in the Record on Appeal** using the South Carolina Court of Appeal's electronic OneDrive filing system, and further certifies that he has served the pro se Appellant and all counsel of record with a true and accurate copy of same by depositing a copy in the United States Mail, with first-class postage affixed thereon, and by electronic mail, as follows:

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