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SC Court of Appeals

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

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

The Honorable T.W. McGee III, Circuit Court Judge

Appellate Case No.: 2025-000104
Civil Action No.: 2024-CP-38-00733

Great Deal Investing LLC, of Wyoming,Appellant,

v.

Jared Burnett, Brett Buras, Damian Bergamaschi, Steve Decker, J&B
Holdings Group, LLC, and Hatchery Hill MHC, LLC,Respondents.

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

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

Orders and Judgments

1. Order Granting Defendants' Motion for Summary Judgment (filed Dec. 9, 2024);
2. Form 4 Order [denying motion to reconsider] (filed Jan. 13, 2025);

Pleadings

3. Summons & Complaint (filed Jun. 6, 2024);
4. Amended Complaint (filed Jul. 2, 2024);
 - a. Exhibits A–H (filed Jul. 2, 2024 as a single .pdf);

Motions

5. Defendants' Notice of Motion and Motion to Dismiss Pursuant to Rule 12(B)(6), SCRCF (filed Jun. 21, 2024);

6. Defendants' Notice of Motion and Motion to Dismiss Plaintiff's Amended Complaint Pursuant to Rule 12(b)(6), SCRCPP, and Motion for Judgment on the Pleadings Pursuant to Rule 12(c), SCRCPP (filed Jul. 3, 2024);
7. [Plaintiff's] Motion for Summary Judgment (filed Jul. 8, 2024);
8. Defendants' Notice of Motion and Motion for Summary Judgment (filed Aug. 19, 2024);
 - a. Exhibit A: [Affidavit of Erica B. Wade] (filed Aug. 19, 2024);
 - b. Exhibit B: [Affidavit of Brett Buras] (filed Aug. 19, 2024);
 - c. Exhibit C: [Affidavit of Jared Burnett] (filed Aug. 19, 2024);
 - d. Exhibit D: [Affidavit of Damian Bergamaschi] (filed Aug. 19, 2024);
 - e. Exhibit E: [Affidavit of Steve Decker] (filed Aug. 19, 2024);
9. Plaintiff's Memorandum in Opposition to Defendants' Motions to Dismiss and for Judgment on the Pleadings (filed Aug. 27, 2024);
10. Plaintiff's Memorandum in Support of Motion for Summary Judgment (filed Aug. 27, 2024);
11. Defendants' Memorandum in Support of Its Motion to Dismiss, in Opposition to Plaintiff's Motion for Summary Judgment, and in Support of Defendants' Motion for Summary Judgment (filed Aug. 28, 2024);
12. Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment (filed Aug. 30, 2024);
13. Plaintiff's Supplemental Memorandum in Opposition to Defendants' Motion for Summary Judgment (Sep. 4, 2024);
14. Plaintiff's Second Supplemental Memorandum in Opposition to Defendants' Motion for Summary Judgment (filed Oct. 17, 2024);
15. Defendants' Supplemental Memorandum in Response to Plaintiff's Second Supplemental Memorandum (Dated 10/17/24) (filed Oct. 21, 2024);
16. Plaintiff's Reply to Defendants' Supplemental Memorandum in Response to Plaintiff's Second Supplemental Response (filed Oct. 25, 2024);
17. [Plaintiff's] Motion to Alter or Amend (filed Dec. 9, 2024);

Transcripts

18. Transcript of Hearing (Date: Sept. 4, 2024); and

Other

19. Affidavit [of Nathan Johns] (filed Jul. 8, 2024).

CERTIFICATION OF COUNSEL

In accordance with Rule 209(c), SCACR, the undersigned counsel certifies that this Designation of Matter contains no matter which is irrelevant to the appeal.

s/ Joey R. Floyd
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April 7, 2025
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