

**RECEIVED**

**Apr 29 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEE COUNTY  
Court of Common Pleas  
Richard L. Hinson, Special Referee

App. Case No. 2024-001025

Carroll D. Brown,.....Appellant,

v.

John M. Baker dba Humpty Dumpty Mobile Home Park and Dream Home Properties,  
LLC..... Respondent.

---

RESPONDENT’S REPLY TO RETURN TO MOTION TO REQUIRE  
APPELLANT TO SERVE RECORD ON APPEAL THAT CONTAINS ALL  
DESIGNATED MATTER OR DISMISS APPEAL

---

Respondent hereby submits this reply to the Appellant’s return to Respondent’s motion for an order that 1) directs the Appellant to serve and file a record on appeal that contains all the materials the parties designated for inclusion in the record on appeal and 2) directs the dismissal of this appeal if the Appellant does not meet this requirement. Appellant replies as follows to the return:

1. The materials appropriate for designation and inclusion in the record on appeal are those that were presented to the lower court. Rule 210(c), SCACR. There is no limitation to those materials or portions thereof that were specifically cited in a party’s brief.
2. Respondent designated the trial transcript – not only parts of it – for inclusion in Item 9 of his designation.

3. The deposition with which Appellant takes issue was one of his exhibits used at trial. Respondent designated all trial exhibits for inclusion in the record on appeal. It is required to be included in the record on appeal. Id.

WHEREFORE Respondent prays for an order that 1) directs the Appellant to serve and file a record on appeal that contains all the materials the parties designated for inclusion in the record on appeal and 2) directs the dismissal of this appeal if the Appellant does not meet this requirement.

Respectfully submitted,

/s/ Andrew S. Radeker

Kevin M. Barth  
S.C. Bar No. 559  
Barth, Ballenger & Lewis, LLP  
Post Office Box 107  
Florence, South Carolina 29503  
(843) 662-6301  
kbarth@bblawsc.com

*and*

Andrew S. Radeker  
S.C. Bar No. 73743  
Radeker Law, P.A.  
Post Office Box 6903  
Columbia, South Carolina 29260  
(803) 500-0891  
drew@radekerlaw.com  
Attorneys for Respondent

April 29, 2025

**RECEIVED**

**Apr 29 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEE COUNTY  
Court of Common Pleas  
Richard L. Hinson, Special Referee

App. Case No. 2024-001025

Carroll D. Brown,.....Appellant,

v.

John M. Baker dba Humpty Dumpty Mobile Home Park and Dream Home Properties,  
LLC..... Respondent.

---

PROOF OF SERVICE

---

I certify that I have served the foregoing reply to return to motion to require service of record on appeal or dismiss appeal on the date given below by emailing it to opposing counsel at the address(es) noted below.

John W. Bledsoe, III, Esq., at john@johnbledsoelaw.com

Respectfully submitted,

/s/ Andrew S. Radeker

Kevin M. Barth  
S.C. Bar No. 559  
Barth, Ballenger & Lewis, LLP  
Post Office Box 107  
Florence, South Carolina 29503  
(843) 662-6301  
kbarth@bblawsc.com

*and*  
Andrew S. Radeker  
S.C. Bar No. 73743  
Radeker Law, P.A.  
Post Office Box 6903  
Columbia, South Carolina 29260  
(803) 500-0891  
drew@radekerlaw.com  
Attorneys for Respondent

April 29, 2025