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May 05 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appellate Case No. 2023-001147

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes III, Master in
Equity and Special Circuit Court Judge
Case No. 2020-CP-07- 00977

BOKF Real Estate Holding, LLC

Respondent,

v.

T &S Management, Inc. and
Turan Strange

Appellants.

MOTION TO AMEND DESIGNATION OF
MATTER ON APPEAL

Appellants T & S Management, Inc. and Turan Strange, through undersigned counsel, respectfully move the Honorable Court for an Order permitting them to amend their Designation of Matter on appeal to include excerpts from the deposition of Turan Strange, included at page 211 et seq of the Amended Record. This Motion follows the Court's Order of February 11, 2025. Appellants note that Respondent included excerpts from the transcript of the same deposition taken May 11, 2022 in support of their response to the Appeal and in support of their underlying motion for summary judgment. Appellants aver that the designated excerpts are from a matter already in the Record, and also in possession of Respondents, and that the excerpts are necessary to evaluate the Order granting summary judgment which is appealed in this case.

The additional item referenced in the Court's Order of February 11, 2025, being

the Amended Affidavit of Turan Strange previously included at page 208 of the Amended Record has been stricken by Appellants.

WHEREFORE, Appellants request that the Court permit Appellants to amend their Designation of Matter for Appeal to include the additional excerpts from the deposition testimony of Turan Strange taken May 11, 2022.

May 5, 2025

Respectfully Submitted,

Mogil Law Firm

/s/ Michael W. Mogil

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Appellants.

PROOF OF SERVICE

On this 5th day of May, 2025 he undersigned did serve a copy of Appellants Motion to Amend Designation of Matter on counsel for the undersigned by mail to

Edward Kubec Esq.
Novit & Scarminach
52 New Orleans Road
Hilton Head Island, SC
29928

May 5, 2025

Respectfully Submitted,

Mogil Law Firm

/s Michael W. Mogil

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