

**RECEIVED**

**Jun 23 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY

Court of Common Pleas

The Honorable Dale E. Van Slambrook, Circuit Court Judge

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Case No. 2024-CP-08-02013

Appeal No. 2025-000500

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Gillam & Associates, Inc., .....Appellant,

v.

Pampa Bay Landscape Construction, LLC, .....Respondent.

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RESPONDENT’S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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Respondent Pampa Bay Landscape Construction, LLC, by and through the undersigned counsel, hereby proposes the following matter to be included in the Record on Appeal:

**Orders:**

1. Order of February 12, 2025

**Pleadings:**

1. Complaint
  - a. Exhibit A to the Complaint – Subcontract
  - b. Exhibit B to the Complaint – June 13, 2024 Demand Letter
  - c. Exhibit C to the Complaint – Notice and Certificate of Mechanics’ Lien

2. Answer and Counterclaim

**Motions:**

1. Motion to Stay Action Pending Arbitration Between the Parties
  - a. Exhibit A to Motion to Stay – Bond in Release of Mechanic’s Lien
  - b. Exhibit A-1 to Motion to Stay – Affidavit of Eric Floyd
2. Memorandum in Support of Motion to Stay Action Pending Arbitration
3. Plaintiff’s Memorandum in Opposition to Defendant Gillam & Associates, Inc’s Motion to Stay Pending Arbitration;
  - a. Exhibit A to Memo in Opposition - Subcontract
  - b. Exhibit B to Memo in Opposition – Affidavit of Peter Gallo

**Other Materials:**

1. Transcript of Proceedings
2. Notice of Appeal

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

Respectfully submitted,

s/Dylan R. Glick  
Dylan R. Glick, SC Bar No. 105210  
Gallivan, White & Boyd, P.A.  
Post Office Box 7368  
Columbia, SC 29202  
[dglick@gwblawfirm.com](mailto:dglick@gwblawfirm.com)  
(803) 779-1833

*Attorney for Respondent*

Columbia, South Carolina  
June 23, 2025

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PROOF OF SERVICE

This is to certify that the undersigned counsel has caused to be served this day (1) copy of the **Respondent's Designation of Matter** via electronic mail to the address stated in the Supreme Court Order 2022-05-06-03 and in accordance with Rule 262 of the South Carolina Appellate Court Rules, and additionally via electronic mail to the following counsel of record in this matter as set forth below:

Matthew E. Cox, Esq.  
Smith Currie Oles, LLP  
5727 Westpark Drive, Suite 200  
Charlotte, NC 28217  
[mecox@smithcurrie.com](mailto:mecox@smithcurrie.com)  
*Attorney for Appellant*

A copy of the email serving the aforementioned to all counsel of record is attached hereto.

Respectfully submitted,

s/Dylan R. Glick

Dylan R. Glick, SC Bar No. 105210

Gallivan, White & Boyd, P.A.

Post Office Box 7368

Columbia, SC 29202

[dglick@gwblawfirm.com](mailto:dglick@gwblawfirm.com)

(803) 779-1833

*Attorney for Respondent*

Columbia, South Carolina

June 23, 2025

## Jillian Hansen

---

**From:** Jillian Hansen  
**Sent:** Monday, June 23, 2025 5:00 PM  
**To:** 'Cox, Matthew'  
**Cc:** Dylan Glick  
**Subject:** RE: 11121-1 Gillam v. Pampa Bay (Appeal)  
**Attachments:** Respondent's Designation of Matter.pdf; Proof of Service - Respondent's Designation of Matter.pdf

**Categories:** DRG

Good afternoon,

Attached hereto and served upon you, please find the Respondent's Designation of Matter which is being filed with the SC Court of Appeals today. A copy of this message will be affixed to the attached Proof of Service, which is also being filed today.

Kind regards,  
Jillian



**Jillian Hansen**  
Paralegal  
jhansen@gwblawfirm.com

**Gallivan, White & Boyd P.A.**  
1201 Main Street | Suite 1200 | Columbia SC 29201  
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**From:** Jillian Hansen  
**Sent:** Monday, June 23, 2025 11:19 AM  
**To:** Cox, Matthew <mecox@smithcurrie.com>  
**Cc:** Dylan Glick <dglick@gwblawfirm.com>  
**Subject:** 11121-1 Gillam v. Pampa Bay (Appeal)

Good morning,

Attached hereto and served upon you, please find the Respondent's Brief which is being filed with the SC Court of Appeals today. A copy of this message will be affixed to the attached Proof of Service, which is also being filed today.

Kind regards,  
Jillian



**Jillian Hansen**  
Paralegal  
jhansen@gwblawfirm.com

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