

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
John C. Hayes, Circuit Court Judge

Civil Action Number: 2011-CP-26-07558

James H. Bailey, Jr.,.....Respondent,

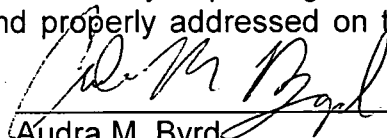
v.

Development Systems International, LLC,
David Austerson, John R. Curtis, James P. LaRose,
Dianne LaRose, Robert C. MacConnell, and Sandra Morkel,
of whom David Austerson, John R. Curtis, James P. LaRose,
Robert C. MacConnell, and
Sandra Morkel are.....Appellants.

RECEIVED
OCT 04 2013
SC Court of Appeals

PROOF OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Respondent's Initial Brief and Designation of Matter in the above-referenced case has been served upon opposing counsel by depositing a copy of it in the United States mail, postage prepaid and properly addressed on this 3rd day of October, 2013.



Audra M. Byrd
R. Wayne Byrd
Turner Padgett Graham & Laney P.A.
Post Office Box 2116
Myrtle Beach, SC 29578
Telephone: (843) 213-5500
Facsimile: (843) 213-562

Attorneys for Respondent

TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON
COLUMBIA
FLORENCE
GREENVILLE
MYRTLE BEACH

Audra M. Byrd

REPLY TO:

E-Mail: AByrd@TurnerPadget.com
Writer's Direct Dial: (843) 213-5520
Direct Fax: (843) 213-5620

October 3, 2013

South Carolina Clerk of Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RECEIVED
OCT 04 2013
SC Court of Appeals

RE: James H. Bailey, Jr. vs. David Auterson, John R. Curtis, James P. LaRose, Robert C. MacConnell, and Sandra M. Morckel
Court of Appeals Case No.: 2013-001062
Trial Court Case No.: 2011-CP-26-07558

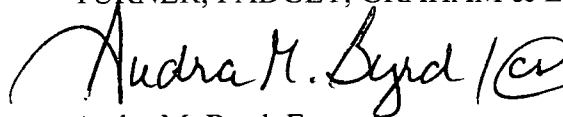
Dear Clerk of Court of Appeals:

Please find enclosed an original and one (1) copy of the Designation of Matter to Be Included on Appeal, the Initial Brief of Respondent and the Proof of Service, for filing with the Court. Please return a clocked copy of these documents to me in the enclosed self-addressed, stamped envelope provided for your convenience.

Should you have any questions, please do not hesitate to contact me. I greatly appreciate your assistance in this matter. Thank you very much.

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Audra M. Byrd, Esq.

AMB/cs
enclosures

cc: George E. Graham, Esq.

BUSINESS • LITIGATION • SOLUTIONS

Founders Centre • 2411 North Oak Street • Suite 301 (29577) • PO Box 2116 • Myrtle Beach, SC 29578
Phone (843) 213-5500 • Fax (843) 213-5555 • turnerpadget.com