

RECEIVED

Jul 23 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Judge  
J. Derham Cole, Sr., Circuit Judge

---

Appellate Case No. 2025-000627

---

PNC Bank, N.A., successor by  
merger to PNC Equipment Finance,  
LLC,

Respondent,

v.

S & J Asphalt Paving, LLC, Jose  
Luis Guerrero, and Scott Robert  
Ronson,

Appellants.

---

CORRECTED PROOF OF SERVICE FOR DESIGNATION OF MATTER

---

I certify that I have served Appellants' Designation of Matter upon the Respondent by sending the same to Respondent's attorneys of record at the e-mail addresses listed for said counsel in the AIS system this 22<sup>nd</sup> day of July, 2025, in accordance with *In re Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024)* (d)(4), S.C. Sup. Ct. Order filed April 24, 2024. A copy of the e-mail to opposing counsel is attached hereto and incorporated by reference. I further certify that I have caused a copy of the Appellants' Memorandum in Support of Appealability to be sent to counsel for the Respondent by depositing the same in the United States Mail, with sufficient postage attached, addressed as follows: Smith Debnam Narron Drake Saintsing & Myers, LLP, 4601 Six Forks Road, Suite 400, Raleigh, NC 27609.

Respectfully submitted,

s/ W.H. McAbee III

Willie H. McAbee III (S.C. Bar #103662)

**DAVID R. PRICE, JR., P.A.**

1001 East Washington Street (29601)

Post Office Box 2446

Greenville, South Carolina 29602

(864) 271-2636 – Telephone

(864) 271-2637 – Facsimile

[Will@GreenvilleLegal.com](mailto:Will@GreenvilleLegal.com)

Attorney for the Appellants

Date: July 22, 2025

Greenville, South Carolina

Other Counsel of Record:

Rachel E. Rogers (S.C. Bar #106048)

Melissa Tulis Smith (S.C. Bar #104464)

SMITH DEBNAM NARRON DRAKE SAINTSING & MYERS, LLP

4601 Six Forks Road, Suite 400

Raleigh, North Carolina 27609

(919) 250-2000 – Telephone

(919) 250-2211 – Facsimile

[rrogers@smithdebnamlaw.com](mailto:rrogers@smithdebnamlaw.com)

[mtulis@smithdebnamlaw.com](mailto:mtulis@smithdebnamlaw.com)

Attorneys for the Respondent