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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

William C. McMaster, Circuit Court Judge

Common Pleas Case No. 2025-CP-23-00389

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Appellate Case No.

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Southern Painting and Maintenance Specialists,  
LLC.,

Appellant,

v.

Greenville County,

Respondent.

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**APPELLANT'S INITIAL DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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Respectfully submitted this 22<sup>nd</sup> day of July 2025.

CAMPBELL TEAGUE LLC

*s/John-Paul Baum*

John-Paul Baum (SC Bar #104938)

Emily O'Brian (SC Bar #101824)

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Attorneys for Appellant

**APPELLANT'S INITIAL DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

**I. ORDERS / JUDGMENTS/ DECISIONS**

1. Order Form 4 Dated April 21, 2025, by which the Trial Court Denied Appellant's Motion for Preliminary Injunction
2. Order Form 4 Dated April 21, 2025, by which the Trial Court Denied Appellant's Motion for Declaratory Judgment
3. Order Dated May 8, 2025, by which the Trial Court Denied Appellant's Motion for Preliminary Injunction and for Declaratory Judgment
4. Order Form 4 Dated June 3, 2025, by which the Trial Court Denied Appellant's Motion to Alter or Amend Judgment

**II. PLEADINGS**

1. Appellant's Initial Complaint, Jan. 23, 2025
2. Appellant's Motion for Declaratory Judgment, Jan. 24, 2025
3. Appellant's Motion for Preliminary Injunction, Jan. 24, 2025
4. Respondent's Initial Answer, March 4, 2025
5. Appellant's Motion to Alter or Amend Judgment, May 16, 2025

**III. TRANSCRIPTS**

1. Transcript of Hearing Held April 14, 2025

**IV. OTHER MATERIALS OR DOCUMENTS**

1. Appellant's Affidavit of Bob Maffett, Jan. 24, 2025 *w/ Attachments*
  - i. Exhibit A: Screenshot of Tailor Made Services, Inc. search on South Carolina Labor, Licensing, and Regulation ("SCLLR") website, Jan. 24, 2025
  - ii. Exhibit B: Screenshot of Tailor Made Services, Inc. search on South Carolina business entity website, Jan. 24, 2025
  - iii. Exhibit C: Notice of Formal Protest letter from Appellant to Greenville County Procurement Services, Dec. 3, 2024
  - iv. Exhibit D: Letter from Sherwin Williams to Appellant, Jan. 15, 2025
  - v. Exhibit E: Tailor Made Services, Inc. proposal and emails with Greenville County, Jan. 24, 2025
2. Appellant's Affidavit of Service on Greenville County, Feb. 6, 2025
3. Respondent's Affidavit of Robert Brewer, April 10, 2025 *w/ Attachments*
  - i. Exhibit A: Request for Proposals #25029, Sep. 20, 2024

- ii. Exhibit B: Notice of Formal Protest letter from Appellant to Greenville County Procurement Services, Dec. 3, 2024
  - iii. Exhibit C: Respondent's emails & written correspondence with SCLLR about Tailor Made Services, Inc. licensing requirement, Dec. 4, 2024-Jan. 14, 2025
  - iv. Exhibit D: Certificate of Registration, Feb. 12, 2025
- 4. Respondent's Memorandum in Opposition to Appellant's Motions for Preliminary Injunction and for Declaratory Judgment, April 10, 2025
- 5. Appellant's Memorandum in Support of Preliminary Injunction, April 11, 2025 w/ Attachments
  - i. Exhibit A: Greenville County's Procurement Code, Section 7-192(b), April 11, 2025
  - ii. Exhibit B: Screenshot of Tailor Made Services, Inc. search on South Carolina Labor, Licensing, and Regulation ("SCLLR") website, Jan. 24, 2025
  - iii. Exhibit C: Screenshot of Tailor Made Services, Inc. search on South Carolina business entity website, Jan. 24, 2025
  - iv. Exhibit D: Respondent's Answers to Appellant's Request to Admit, April 10, 2025
- 6. Appellant's Memorandum in Support of Declaratory Judgment April 11, 2025 w/ Attachments
  - i. Exhibit A: Tailor Made Services, Inc. Bid, Nov. 5, 2024
  - ii. Exhibit B: Request for Proposals #25029, Sep. 20, 2024
  - iii. Exhibit C: Email from Office of Advice Counsel of LLR to Appellant re advice about general contractor license, March 7, 2025
  - iv. Exhibit D: Respondent's Answers to Appellant's Request to Admit, April 10, 2025
  - v. Exhibit E: Judge Edward W. Miller Order granting Plaintiff's Motion for Summary Judgment in Padgett v. McPhee case, March 13, 2020
  - vi. Exhibit F: Screenshot of Tailor Made Services, Inc. search on South Carolina Labor, Licensing, and Regulation ("SCLLR") website, Jan. 24, 2025
- 7. Respondent's Memorandum in Opposition to Appellant's Motion to Alter or Amend Judgment, May 27, 2025
- 8. Appellant's Notice of Appeal, June 5, 2025 w/ Attachments
  - i. Attachment A: Order Form 4, April 21, 2025
  - ii. Attachment B: Order Form 4, April 21, 2025
  - iii. Attachment C: Order, May 8, 2025
  - iv. Attachment D: Order Form 4, June 3, 2025

## 6. CERTIFICATION

Consistent with Rule 209, SCACR, the undersigned counsel for Appellant hereby certifies that the foregoing designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,

CAMPBELL TEAGUE LLC

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