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**Aug 14 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Appellate Case No.: 2022-000622  
Circuit Case No.: 2022-CP-10-03684

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RUSSELL CRAWFORD,

Respondent,

v.

RAYMOND BABICH,

Appellant.

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**RESPONDENT'S RETURN IN OPPOSITION TO MOTION TO ADD EVIDENCE TO  
THE RECORD AND/OR TO SUPPLEMENT THE RECORD ON APPEAL**

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COMES NOW, the Respondent, Raymond Babich ("Babich"), by his undersigned attorney of record, hereby files Babich's Return in Opposition to the Motions filed by Appellant to Add Evidence to the Record and/or to Supplement the Record on Appeal. For the following reasons, it is respectfully submitted that the Appellant's Motions must be denied.

**Argument**

Under Rule 209, the Appellant was responsible for filing a Designation of Matters to be Included in the Record on Appeal; and, ultimately, preparing the Record on Appeal. There was motion practice concerning the Appellant's failure to include the actual July

12, 2022 Order for Eviction at issue. In the record on appeal, the Appellant failed to include the ten (10) alleged emails in the Designation of Matters that Appellant now wants to add to the Record on Appeal. There is no evidence that these ten (10) alleged emails were received into evidence by the Magistrate or Circuit Court. Accordingly, there is no relevance to adding the ten (10) alleged emails.

Moreover, the parties have filed Briefs in reliance on the Record on Appeal as prepared. This case has already been decided by Opinion of this Court. Under Rule 212, the time to supplement the Record on Appeal has passed following this Court's Decision.. Respondent does not consent and opposes the Motions to Add Evidence or Supplement the Record on Appeal.

### **Conclusion**

For the foregoing reasons, Babich respectfully requests that Appellant's Motions to Add Evidence or Supplement the Record on Appeal must be denied.

Dated: August 14, 2025

Respectfully submitted,

*s/William B. Jung*  
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Attorney for the Respondent

**PROOF OF SERVICE**

I, William B. Jung, Esq., certify under penalty of perjury that on August 14, 2025, I served a copy of the Respondent's Return to the Motion to Dismiss Eviction by emailing and mailing a true and complete copy thereof the Appellant:

Raymond T. Crawford  
4683 W. Montague Ave., Lot 3  
North Charleston, S.C. 29418  
russellcrawfordsc@gmx.com.

Dated: August 14, 2025

*s/William B. Jung*

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Attorney for the Respondent