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**Aug 18 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

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Appellate Case No. 2025-000860

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Ina Shtukar Steinberg,

Appellant,

v.

SC Property,

Respondent.

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**APPELLANT'S RULE 209 DESIGNATION  
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

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August 15, 2025

s/ Ina S. Steinberg  
Ina Shtukar "Steinberg" Esquire  
SC Bar No.105916  
1687 Saybrook Court  
Rock Hill, SC 29732  
(704)-309-0992  
ina@blackandwhiteimmigrationlaw.org  
*ATTORNEY FOR APPELLANT*

## DESIGNATION

**NOW COMES** Appellant, pursuant to Rule 209 and 210(c), and designates the following matters to be included in the Record on Appeal:

- I. ORDERS
  - i. October 21, 2024, Order granting Defendant's Motion to Dismiss in part dismissing all claims other than a breach of contract claim.
  - ii. April 4, 2025 Order denying Plaintiff's Motion for Summary Judgment and granting Defendant's Cross-Motion for Summary Judgment.
- II. PLEADINGS
  - i. Plaintiff's Complaint filed on April 1, 2024.
  - ii. May 15, 2024, Answer.
- III. TRANSCRIPTS
  - i. Transcript of September 11, 2024 hearing.
  - ii. Transcript of March 12, 2025 hearing.
- IV. EXHIBITS
  - i. Plaintiff's Affidavit to Plaintiff's Motion for Summary Judgment.
  - ii. Davis Claim Services Report as Exhibit 3 to Plaintiff's Motion for Summary Judgment.
  - iii. October 7, 2021 Claim Notes as Exhibit 4 to Plaintiff's Motion for Summary Judgment.
  - iv. Weather Report as Exhibit 5 to Plaintiff's Motion for Summary Judgment.
  - v. December 20, 2021 Claim Denial Letter as Exhibit 6 to Plaintiff's Motion for Summary Judgment.
  - vi. Benchmark Report as Exhibit 7 to Plaintiff's Motion for Summary Judgment.
  - vii. Susan Ryder's emails to the adjuster as Exhibit 8 to Plaintiff's Motion for Summary

Judgment.

- viii. January 3, 2022 Claim Notes as Exhibit 9 to Plaintiff's Motion for Summary Judgment.
- ix. Adjuster's February 28, 2022, and March 15, 2022, Emails as Exhibit 10 to Plaintiff's Motion for Summary Judgment.
- x. Defendant's Summary Reaffirmation of the denial of the claim and notice of the insurer's insolvency as Exhibit 11 to Plaintiff's Motion for Summary Judgment.
- xi. Plaintiff's Deficiency Letter as Exhibit 1 to Plaintiff's Response in opposition to Defendant's "Notice of Motion and Motion for Summary Judgment."
- xii. Plaintiff's Proof of Claim as Exhibit 2 to Plaintiff's Response in opposition to Defendant's "Notice of Motion and Motion for Summary Judgment."
- xiii. Confirmation of the submission of Proof of Claim from Division of Rehabilitation and Liquidation of the Florida Department of Financial Services as Exhibit 3 to Plaintiff's Response in opposition to Defendant's "Notice of Motion and Motion for Summary Judgment."
- xiv. Renewed Claim Submission to Defendant as Exhibit 4 to Plaintiff's Response in opposition to Defendant's "Notice of Motion and Motion for Summary Judgment."
- xv. Defendant's Acknowledgment of the claim as Exhibit 5 to Plaintiff's Response in opposition to Defendant's "Notice of Motion and Motion for Summary Judgment."
- xvi. 2020 Homeowner's Policy Declaration as Exhibit 6 to Plaintiff's Motion for Summary Judgment as Exhibit 6 to Plaintiff's Response in opposition to Defendant's "Notice of Motion and Motion for Summary Judgment."
- xvii. 2021 Homeowner's Policy Declaration as Exhibit 7 to Plaintiff's Motion for Summary Judgment as Exhibit 1 to Plaintiff's Response in opposition to Defendant's "Notice of

Motion and Motion for Summary Judgment.”

- xviii. Plaintiff’s Affidavit in support of Plaintiff’s Response in opposition to Defendant’s “Notice of Motion and Motion for Summary Judgment.”
- xix. Haag Report as Defendant’s Exhibit 1 to Cross-Motion for Summary Judgment.

V. MOTIONS

- i. Defendant’s May 15, 2024 Motion to Dismiss in part.
- ii. Plaintiff’s February 10, 2025 Motion for Summary Judgment.
- iii. Defendant’s March 3, 2025 Notice of Motion and Motion for Summary Judgment.
- iv. Defendant’s March 11, 2025 Cross Motion for Summary Judgment.

VI. MEMORANDA

- i. Plaintiff’s May 22, 2024 Response in Opposition to Defendant’s Motion to Dismiss in part.
- ii. Plaintiff’s September 11, 2024 Supplemental Brief in Opposition to Defendant’s Motion to Dismiss in part.
- iii. Plaintiff’s March 6, 2025 Response in Opposition to Defendant’s “Notice of Motion and Motion for Summary Judgment.”

VII. OTHER MATERIALS

- i. Emails exchanged by defense counsel and the Clerk’s Office on April 30, 2025, concerning May 5, 2025 Notice of Hearing issued in connection with Defendant’s March 11, 2025 Cross Motion for Summary Judgment.

Respectfully submitted,  
August 15, 2025

s/ Ina S. Steinberg  
Ina Shtukar “Steinberg” Esquire  
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Ina Shtukar Steinberg,

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CERTIFICATE OF COMPLIANCE AND SERVICE

The undersigned hereby certifies that Appellant's Rule 209 Designation was served on all counsel of record by electronic mail addressed as follows:

LAFAVE BAGLEY, LLC  
Mary D. LaFave, Esquire  
Laura R. Baer, Esquire  
mary@crowelafave.com  
laura@crowelafave.com

August 15, 2025

s/ Ina S. Steinberg  
Ina Shtukar "Steinberg" Esquire  
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BLACK & WHITE LAW, LLP



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August 18, 2025

**VIA EMAIL to ctappfilings@sccourts.org**

South Carolina Court of Appeals  
1220 Senate St  
Columbia, SC 29201

Re: *Ina Shtukar Steinberg v. SC Property/ Appellate Case No. 2025-000860*

Dear Clerk of the Court of Appeals:

Please allow this submission to serve as Appellant's response to the Notice of Deficiency issued on August 15, 2025. Please find enclosed Appellant's Rule 209 Designation, erroneously omitted when Appellant's Initial Brief was filed on August 15, 2025. The undersigned apologizes for the oversight.

Thank you for your assistance with this matter.

Respectfully submitted,

/s/ *Ina S. Steinberg*

Ina Shtukar "Steinberg" Esq.