

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
The Honorable Jocelyn Newman, Circuit Court Judge

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Case No. 2022-CP-40-02713  
Appellate Case No. 2024-000995

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Elizabeth and Melvin Ray,..... Appellants

vs.

Sunsetter Properties, LLC; Nancy Warner Agent for Coldwell Banker  
Residential Brokerage; and Home Inspection One, LLC, ..... Respondents.

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**RESPONDENTS’ RESPONSE TO APPELLANTS’ MOTION FOR LEAVE TO FILE  
AMENDED MEMORANDUM IN OPPOSITION TO RESPONDENTS’ MOTION TO  
STRIKE THE RECORD ON APPEAL AND AMENDED RECORD ON APPEAL**

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In accordance with the South Carolina Appellate Court Rules, Respondent Sunsetter Properties, LLC (“Sunsetter”) and Respondent Home Inspection One, LLC (“HIO”), through their undersigned counsel, hereby jointly respond to Appellants’ Motion for Leave to File Amended Memorandum in Opposition to Respondents’ Motion to Strike the Record on Appeal and Amended Record on Appeal filed on September 12, 2025.

Respondents do not object to Appellants’ Motion to file an Amended Memorandum. However, Respondents reserve their right to file a reply once the Amended Memorandum is filed and accepted by the Court.

[signature page follows]

Respectfully submitted,

**CALLISON TIGHE & ROBINSON, LLC**

s/ Demetri K. Koutrakos

Demetri K. Koutrakos, SC Bar No. 11318

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***Attorney for Respondent Sunsetter  
Properties, LLC***

**AND**

**HALL BOOTH SMITH, PC**

s/ M. Shanter Chaparro

Derek M. Newberry, SC Bar No. 77791

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***Attorneys for Respondent Home Inspection  
One, LLC***

September 22, 2025

**RECEIVED**

**Sep 22 2025**

**SC Court of Appeals**

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**PROOF OF SERVICE**

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I hereby certify that, on this date, Respondents’ Response to Appellants’ Motion for Leave to File Amended Memorandum in Opposition to Respondents’ Motion to Strike the Record on Appeal and Amended Record on Appeal was served on appellants’ counsel of record via AIS email, pursuant to Supreme Court Order dated March 20, 2020, as amended, as follows:

Reagan Singletary, Esquire  
The Singletary Group, LLC  
327 Great North Road  
Columbia, SC 29223  
Email: [reagan@thesingletarygroup.com](mailto:reagan@thesingletarygroup.com)  
*Attorney for Appellants*

I further certify that all parties required by Rule to be served have been served.

**CALLISON TIGHE & ROBINSON, LLC**

*s/ Demetri K. Koutrakos*  
Demetri K. Koutrakos, SC Bar No. 11318  
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Email: [jimkoutrakos@callisontighe.com](mailto:jimkoutrakos@callisontighe.com)  
*Attorney for Respondent Sunsetter  
Properties, LLC*

September 22, 2025

Demetri “Jim” K. Koutrakos - Member  
803-404-6900  
[JimKoutrakos@callisontighe.com](mailto:JimKoutrakos@callisontighe.com)

**RECEIVED**  
**Sep 22 2025**  
**SC Court of Appeals**

September 22, 2025

**VIA EMAIL ONLY:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
S. C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RE: Elizabeth and Melvin Ray vs. Sunsetter Properties, LLC, et al.  
Appellate Case No. 2024-000995

Dear Ms. Kitchings:

Enclosed herewith please find the Respondents’ Response to Appellants’ Motion for Leave to File Amended Memorandum in Opposition to Respondents’ Motion to Strike the Record on Appeal and Amended Record on Appeal, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email.

The enclosed documents have been served upon Appellants’ counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

*s/ Demetri “Jim” K. Koutrakos*

Demetri “Jim” K. Koutrakos

DKK:ksr

Enclosures

cc: Reagan Singletary, Esquire (via email)  
Derek M. Newberry, Esquire (via email)  
M. Shanter Chaparro, Esquire (via email)

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