

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

---

Appellate Case No. 2025-001046

---

**RECEIVED**  
**Oct 13 2025**  
**SC Court of Appeals**

Cambridge Building, Inc. (License No.  
117526)

Appellant,

v.

Robert S. Lotstein, Kristin Huffman, Robert S.  
Lotstein, Trustee of the Robert S. Lotstein  
Family Trust dated September 4, 2002, as  
Amended and Restated, and Kristin S.  
Huffman, Trustee of the Kristin S. Huffman  
Family Trust dated September 4, 2002, as  
Amended and Restated

Respondents.

---

APPELLANT'S DESIGNATION OF MATTER

---

Pursuant to Rule 210(c), SCACR, Appellant hereby designates the following materials to be included in the Record on Appeal:

**Orders**

1. Form 4 Order of the Honorable Benjamin Culbertson filed February 25, 2025 (partially granting Motion to Dismiss and directing attorney Finger to prepare order).
2. Form 4 Order of the Honorable B. Alex Hyman filed April 17, 2025 (continuing Motion to Amend Complaint).
3. Order of the Honorable Benjamin Culbertson filed April 24, 2025 (granting in part Motion to Dismiss).

4. Form 4 Order of the Honorable Benjamin Culbertson filed April 24, 2025 (denying Plaintiff's Motion to Alter or Amend).
5. Form 4 Order of the Honorable Benjamin Culbertson filed May 28, 2025 (denying Plaintiff's Motion to Alter or Amend).
6. Form 4 Order of the Honorable Lawton McIntosh filed July 10, 2025 (staying Motion to Amend Complaint).

### **Pleadings**

7. Summons and Complaint (filed September 18, 2024).
  - a. Exhibit A to Complaint
  - b. Exhibit B to Complaint
  - c. Exhibit C to Complaint
  - d. Exhibit D to Complaint
  - e. Exhibit E to Complaint
8. Respondents' Answer, Counterclaim and Third-Party Complaint (filed May 5, 2025).
9. Appellant's Answer to Counterclaims

### **Transcripts**

10. Transcript of Hearing on Motion to Dismiss (held February 21, 2025).

### **Motions, Exhibits, Other Materials**

11. Respondent's Motion to Dismiss (filed October 18, 2024).
  - a. Exhibit A to Motion to Dismiss
12. Appellant's Motion to Amend Complaint (filed February 18, 2025).
13. Affidavit of Joanna "Nicky" Gleason (filed February 18, 2025).
14. Appellant's Memorandum in Opposition to Motion to Dismiss (filed February 20, 2025).
  - a. Exhibit 1
  - b. Exhibit 2
15. Appellant's Motion to Alter or Amend (filed March 7, 2025).
  - a. Exhibit 1
  - b. Exhibit 2
  - c. Exhibit 3
  - d. Exhibit 4
  - e. Exhibit 5
16. Email and Letter to Judge Culbertson (sent March 10 and 11, 2025).
17. Appellant's Motion to Reconsider (Alter or Amend) (filed May 5, 2025).
  - a. Exhibit 1
18. Email and Letter to Judge Culbertson
19. Notice of Appeal (filed May 5, 2025).
20. Amended Notice of Appeal

Lee Anne Walters (SC Bar No. 74984)  
**WALTERS LAW FIRM**  
Post Office Box 1214  
Beaufort, South Carolina 29901-1214  
(843) 379-0973  
Email: [leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com)

*Counsel for Appellant*