

**RECEIVED**  
**Oct 27 2025**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

---

Common Pleas Case No.: 2024-CP-08-01894  
Appellate Case No.: 2025-001090

---

Erik Lebkicher, Carissa Lebkicher, and  
E. L., a minor child,.....Appellants,

v.

Stephanie Davidson & Drew P.  
Finnegan,.....Respondents.

---

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

---

October 27, 2025

Paul B. Ferrara, III, Esquire  
S.C. Bar No. 70511  
8887 Old University Blvd.  
North Charleston, SC 29406  
(843) 569-5511  
*Attorney for Appellant*

Pursuant to Rule 209(a) SCACR, the Appellant designates the following to be included in the Record of Appeal:

**Orders**

1. March 25, 2025 Order Granting Defendant's Motion to Dismiss Plaintiff's Second Amended Complaint
2. April 10, 2025 Order of Dismissal with Prejudice
3. May 15, 2025 Order Denying Plaintiff's Motion to Reconsider April 10, 2025 Order

**Pleadings**

1. July 10, 2024 Plaintiff's Initial Complaint
2. July 12, 2024 Plaintiff's Amended Complaint
3. October 17, 2024 Plaintiff's Second Amended Complaint
4. October 22, 2024 Affidavit of Service to Defendant Davidson
5. October 24, 2024 Affidavit of Service to Defendant Finnegan
6. November 11, 2024 Defendant Davidson's Motion to Dismiss Plaintiff's Second Amended Complaint
7. November 17, 2024 Defendant Finnegan's Motion to Dismiss Plaintiff's Second Amended Complaint
8. February 20, 2025 Plaintiff's Memo in Opposition of Defendant's Motion to Dismiss and Motion to Amend Second Amended Complaint
9. March 25, 2025 Plaintiff's Motion to Reconsider March 25, 2025 Order
10. April 3, 2025 Plaintiff's Memo in Support of Motion to Reconsider March 25, 2025 Order
11. April 19, 2025 Plaintiff's Motion to Reconsider April 10, 2025 Orders
12. April 21, 2025 Plaintiff's Amended Motion to Reconsider April 10, 2025 Orders
13. April 23, 2025 Defendant Davidson's Reply in Opposition to Plaintiff's Motion
14. April 24, 2025 Defendant Finnegan's Reply in Opposition to Plaintiff's Motion

15. April 24, 2025 Plaintiff's Reply to Defendant Davidson's Opposition

16. April 29, 2025 Plaintiff's Reply to Defendant Finegann's Opposition

17. May 29, 2025 Plaintiff's Notice of Appeal

### **Transcript**

1. February 20, 2025 Transcript of Hearing on Motion to Dismiss Plaintiff's SAC

2. April 3, 2025 Transcript of Hearing on Motion to Reconsider March 25, 2025 Order

I, the undersigned counsel, do hereby certify pursuant to Rule 209(c) SCRCF that Appellant's Designation of Matter to be included in the Record on Appeal contains no matter that is irrelevant to this appeal.

Respectfully submitted this 27<sup>th</sup> day of October 2024.

### **FERRARA LAW FIRM, PLLC**

*/s/ Paul B. Ferrara, III*

Paul B. Ferrara, III (SC Bar No. 70511)

8887 Old University Blvd.

North Charleston, SC 29406

(843) 569-5511 / (843) 569-5411 fax

[paul@ferraralawfirm.net](mailto:paul@ferraralawfirm.net)

*Attorney for Appellant*