

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

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Nov 21 2025

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
THE HONORABLE ROBERT J. BONDS
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2025-000384
CIVIL ACTION NO. 2022-CP-07-2483

Roland Bernardon and Louise Bernardon,

APPELLANTS,

versus

Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the Beach Club,
Robert Reichel, and John McMahan,

DEFENDANTS,

of which Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the
Beach Club, and Robert Reichel are the

RESPONDENTS.

**RESPONDENTS'
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the Beach Club, and
Robert Reichel, Respondents in the above referenced matter, propose the following be
included in the Record on Appeal:

1. Complaint, filed December 30, 2022;
2. Sea Pines Real Estate and Reichel Answer, filed February 9, 2023;

3. Damianos' Answer, filed March 10, 2023;
4. Amended Complaint, filed April 30, 2024;
5. Sea Pines Real Estate and Reichel Answer to Amended Complaint, filed May 6, 2024;
6. Damianos' Answer to Amended Complaint, filed May 6, 2024;
7. Sea Pines Real Estate and Reichel Motion and Memorandum in Support of Summary Judgment, filed January 29, 2024;
8. Damianos' Motion and Memorandum in Support of Summary Judgment, filed January 30, 2024;
9. The following exhibits to Sea Pines Real Estate, Reichel, and Damianos' Motions for Summary Judgment:
 - A. Prior MLS listings;
 - B. 2016 Coastal Appraisal;
 - C. January 2022 Coastal Appraisal;
 - D. Beaufort County Tax Records;
 - E. January 19, 2022 MLS listing;
 - G. Text Message re: back up offer;
 - H. Letter to Mr. Reichel to Appellants' counsel;
 - I. February 5, 2022 MLS;
 - J. Contract of Sale;
 - K. March 2, 2022 Appraisal;
 - L. DocuSign Metadata;
 - M. February 7, 2022 e-mail; and
 - O. Deposition of Louise Bernardon;
10. Affidavit of Mark Damiano, filed February 2, 2024;
11. Affidavit of Ellery K. Damiano, filed February 2, 2024;
12. Plaintiffs' Memorandum in Opposition to Damiano Motion for Summary Judgment, filed December 11, 2024;
13. Plaintiffs' Memorandum in Opposition to Sea Pines Defendants' Motion for Summary Judgment, filed December 11, 2024;
14. Deposition of Roland Bernardon, attached as exhibit to Plaintiffs' Memorandum in Opposition to Sea Pines Defendants' Motion for Summary Judgment, filed December 11, 2024;

15. Hearing Transcript before The Honorable Robert J. Bonds on December 12, 2024;
16. Form 4 Order, filed December 16, 2024;
17. Motion to Alter, Amend and Reconsider, filed December 26, 2024;
18. Order granting summary judgment, filed December 31, 2024;
19. Memorandum in Support of Motion to Alter, Amend and Reconsider, filed January 14, 2025;
20. Form 4 Order, filed January 20, 2025; and
21. Form 4 Order, filed January 30, 2025.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

/s Carmen V. Ganjehsani

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and Robert Reichel

November 21, 2025.