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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Mikell R. Scarborough
Master in Equity

Appellate Case No. 2025-001384

John Kachmarsky, individually, as Manager of K&T Group, LLC, and as Trustee of the Revocable Trust of John Kachmarsky dated November 30, 2007, as member of K&T Group, LLC, Appellant,

v.

David G. Taylor, individually and as Manager of K&T Group, LLC; Taylor Capital, LLC, as member of K&T Group, LLC; and K&T Group, LLC, and Foley Bullock, LLC, Respondents.

APPELLANT’S AMENDED DESIGNATION OF MATTER
TO INCLUDE IN THE RECORD ON APPEAL

Pursuant to Rule 209(a), SCACR, Appellant John Kachmarsky hereby designates the following matter to be included in the Record on Appeal:

I. ORDERS

1. Referral to Master-in-Equity, filed July 18, 2023
2. Order Denying Plaintiff’s Motion for Summary Judgment, filed January 4, 2024
3. Scheduling Order, filed January 24, 2024
4. Trial Order, filed November 26, 2024
5. Order Granting Rule 60(b) Relief and Intervention, filed April 24, 2025
6. Order Granting Intervention, filed May 2, 2025
7. Order Granting Motion to Reconsider, filed June 17, 2025
8. Order Denying Motion to Reconsider, filed July 31, 2025

II. PLEADINGS

9. Summons and Complaint, filed June 8, 2022
10. Defendants' Answer and Counterclaim, filed August 19, 2022
11. Plaintiff's Reply to Counterclaim, filed September 6, 2022
12. Defendants' Amended Answer and Counterclaim, filed October 10, 2024

III. MOTIONS, MEMORANDA, AND RELATED DOCUMENTS

13. Plaintiff's Motion for Summary Judgment as to Defendants' Counterclaim, filed August 23, 2023
14. Plaintiff's Memorandum in Support of Motion for Summary Judgment as to Counterclaim, filed December 28, 2023
15. Defendants' Memorandum in Opposition to Motion for Summary Judgment, filed January 4, 2024.
16. Plaintiff's Pretrial Brief, filed September 2024
17. Defendants' Motion to Amend Answer and Counterclaim, filed September 16, 2024
18. Plaintiff's Motion for Reconsideration, filed December 6, 2024
19. Defendants' Affidavit of Costs and Attorney's Fees, filed December 11, 2024
20. Plaintiff's Rule 60(b)(2) Motion for Relief from Judgment Due to Newly Discovered Evidence, filed January 17, 2025
21. Motion to Intervene, filed January 22, 2025
22. Defendants' Response to Plaintiff's Motion for Reconsideration, filed January 21, 2025
23. Defendants' Response to Plaintiff's Motion for Relief from Judgment, filed January 24, 2025
24. Plaintiff's Reply on Memorandum in Support of Rule 60(b), filed January 27, 2025
25. Plaintiff's Memorandum in Support of Rule 60(b) Motion, filed March 24, 2025
26. Exhibits to Plaintiff's Memorandum in Support of Rule 60(b) Motion, filed March 25, 2025
27. Defendants' Response to Plaintiff's Motion for Relief from Judgment, filed March 31, 2025
28. Plaintiff's Reply to Defendant's Memorandum in Opposition to Rule 60(b) Relief, filed April 4, 2025
29. Defendants' Motion to Reconsider, filed May 2, 2025
30. Plaintiff's Email to Court re: Motion to Reconsider, dated May 9, 2025.
31. Proof of ADR, filed June 16, 2025
32. Plaintiff's Email to Court re: Plaintiff's Outstanding Motion for Reconsideration, dated June 20, 2025.
33. Plaintiff's Memorandum Distinguishing Boathouse in Support of Motion to Reconsider, filed July 10, 2025
34. Defendants' Supplemental Memorandum in Opposition to Motion to Reconsider, filed July 17, 2025
35. Plaintiff's Reply on Memorandum in Support to Motion to Reconsider, filed July 23, 2025

IV. EXHIBITS

- 36. Plaintiff's Trial Exhibits (as admitted), filed September 23, 2024
- 37. Defendants' Trial Exhibits (as admitted), filed September 23, 2024
- 38. Plaintiff's Evidentiary Hearing Exhibits (as admitted), filed March 11, 2024
- 39. Defendant's Evidentiary Hearing Exhibits (as admitted), filed March 11, 2024

IV. NOTICES OF APPEAL

- 40. Notice of Appeal, filed July 11, 2025
- 41. Amended Notice of Appeal, filed August 6, 2025

V. OTHER RELEVANT DOCUMENTS

- 42. Operating Agreement of K&T Group, LLC (Also Filed as Exhibit to Complaint and other Motions).

VI. TRANSCRIPTS

- 43. 09-17-2024 - Trial Transcript
- 44. 01-27-2025 - Hearing Transcript
- 45. 02-20-2025 - Hearing Transcript
- 46. 03-10-2025 - Evidentiary Hearing Transcript
- 47. 04-24-2025 - Hearing Transcript
- 48. 06-30-2025 - Hearing Transcript

CERTIFICATION

I hereby certify that the foregoing Designation contains only matter relevant to the issues presented on appeal, as required by Rule 209(b) and (c), SCACR.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

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November 11, 2025
Mount Pleasant, South Carolina