

December 4, 2025

Steve Maness, Appellant pro se
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Via Email

Charles O. Williams
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RECEIVED
Dec 04 2025
SC Court of Appeals

Appellate Case No. 2024-002011

Steven Maness Appellant

v.

Gunter Heating & Air/Teddy L. Gunter, State Farm Fire and Casualty Co., Defendants,
Of which Gunter Heating & Air/Teddy L. Gunter are the Respondents.

Mr. Williams,

This letter to address your recent concerns summarized below, regarding the arrangement and contents of the Record on Appeal, delivered to you on November 21, 2025.

1. Order of memo & exhibits, without respective reference back to the original memo
2. Motion and Order to Compel included
3. Six (6) photos you called out individually, and indexed as "Appellant – Response Photos"

For point (1) the Record on Appeal was prepared to the best of my ability in compliance with the Court's published rules which outline its indexed order. It does not show Appellant or Respondent sections, but Court defined categories and prohibits the duplication of documents.

Accordingly, the Record was structured with these basic categories:

1. Orders
2. Pleadings
3. Motions
4. Transcript
5. Exhibits

Your memorandum in support of summary judgment appears in the motions section. I think if there was one error, which was unintentional, it was having Jeff Jaco’s affidavit near the end of exhibits and not listed with the other affidavits filed ahead of the hearing, so I propose changing that.

The exhibits referenced in your memorandum properly appear in the exhibits section, grouped with all other exhibits and since some items were pulled ahead by necessity (the list above) and since I had a working list as well, the original sequence you had is different. To help resolve this I propose adding cross references in the index back to your original exhibit numbers. The exhibits nearing the end are also somewhat out of original order just because of how they were placed into Adobe, pulling from my own list as well and may appear as haphazard or “thrown in at the end” as you describe but was completely unintentional. See the changes here in bold:

(Revised) INDEX

Order Granting Motion to Compel, January 22, 2024

Order Granting Motion for Summary Judgment, September 18, 2024

Complaint (**Respondent MSJ Memo Exhibit A**)

Answer

Appellant’s Motion to Compel

Respondent’s Motion for Summary Judgment

Appellant’s Response to MSJ – Affidavit of Warren Maddox.....

Appellant’s Response to MSJ – Affidavit of Steve Maness

Respondent’s Memorandum in support of Motion for Summary Judgment

Jeff Jaco Affidavit (Respondent MSJ Memo Exhibit I).....

Summary Judgment Hearing Transcript – September 6, 2024.....

Appellant’s Motion for Reconsideration

Engineering Report – Maddox Engineering

Engineering Report – EDT (**Respondent MSJ Memo Exhibit H**).....

State Farm HVAC production docs - FILE

State Farm 40-D179-759, Dishwasher 2008 (**Respondent MSJ Memo Exhibit F**)

Small Claims File – Maness v Hogan Builders (**Respondent MSJ Memo Exhibit E**)

Deficiency Letter (**Respondent MSJ Memo Exhibit B**)

GVL County 12-7-05 (**Respondent MSJ Memo Exhibit C**).....

GVL County 12-12-05 (**Respondent MSJ Memo Exhibit D**).....

2009 State Farm (**Respondent MSJ Memo Exhibit G**).....

Appellant – Response Photos

As to point (2) yes, the Motion and Order to compel issued by Judge Morgan are included here but were not on the original list. The order is called for by the Court’s listing guidelines, very relevant to the case and now appeal, was discussed in the hearing in front of Judge Morgan, maintained in the Motion to Reconsider and clearly present in the Appellant’s brief. Not having this item listed is clearly a simple mistake.

Point (3) are photos that are nothing new and have been in the case all along, only (1) is a wider shot, revealing the actual location of photos used in the MSJ Hearing. This is detailed in the reply brief and designated on a separate listing filed with the Court on August 21, 2025.

This is my proposal to move forward. Let me know and I’ll make these changes and send the file as we discussed. Thank you.

Sincerely,

Steve Maness
Appellant, pro se

