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Dec 10 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE COURT OF COMMON PLEAS  
SIXTH JUDICIAL CIRCUIT, CHESTER COUNTY

The Honorable Paul M. Burch, Circuit Court Judge

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Appellate Case No. 2025-001021

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Jai Anne Bullin as Guardian and Conservator for Lillian Anne Brown Rayfield  
(an incapacitated person),

Appellant,

v.

Merri Rowe Thomas,

Respondent,

*AND*

Merri Rowe Thomas,

Respondent,

v.

Jai Anne Bullin,

Appellant.

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**DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL**

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Respondent respectfully proposes that the following matters be included in the record on  
appeal:

### **Orders and Notices**

1. Order Striking the Case from Docket Pursuant to Rule 40(j), SCRCPP (February 15, 2022)
2. Order Granting Plaintiffs' Motion to Alter or Amend Judgment (June 8, 2022)
3. Form 4 Order (March 31, 2023)
4. Notice of ADR (November 23, 2023)
5. Form 4 Order (February 21, 2025)
6. Notice of Hearing (March 5, 2025)
7. Order Denying Plaintiff's Motion to Amend or Alter Judgment (May 15, 2025)
8. Form 4 Order (May 15, 2025)

### **Pleadings**

9. Summons and Complaint (September 7, 2017)
10. Amended Summons and Complaint (October 17, 2017)
11. Answer to Amended Complaint (December 5, 2017)
12. Second Amended Summons and Complaint (April 11, 2023)
13. Summons, Answer, Counterclaims and Third-Party Claims (April 26, 2023)
14. Third-Party Defendant's Answer to Third-Party Plaintiff's Complaint (June 26, 2023)
15. Plaintiff's Reply to Defendant's Counterclaim (June 26, 2023)

### **Transcripts**

16. Transcript (February 14, 2022)
17. Transcript (March 19, 2025)

**Other Materials and Documents**

18. Motion to Amend or Alter Judgment (March 3, 2025)
19. Affidavit of Esther Beckley (March 3, 2025)
20. Affidavit of Thomas B. Roper (March 3, 2025)
21. Defendant and Third-Party Plaintiff Merri Rowe Thomas's Reply in Opposition to Plaintiff's Motion to Alter or Amend Judgment (March 18, 2025)
22. Certificate of Service (April 17, 2025)
23. Supplemental Affidavit of Thomas B. Roper (April 18, 2025)

Pursuant to Rule 209, SCACR, the undersigned counsel certifies that this *Designation of Matters to Be Included in the Record on Appeal* contains no matter which is irrelevant to this appeal.

Respectfully submitted on this 10th day of December, 2025.

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***Counsel for Respondent***

December 10, 2025

Lake Wylie, South Carolina

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**CERTIFICATE OF SERVICE**

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The undersigned certifies that on December 10, 2025, a copy of the foregoing *Designation of Matters to Be Included in the Record on Appeal* was filed with this Court and served upon all

counsel of record in this matter, including the following, pursuant to the relevant Order of the Supreme Court<sup>1</sup>:

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This 10th day of December, 2025.

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***Counsel for Respondent***

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<sup>1</sup> Order, *RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024)*, Appellate Case No. 2020-000447, April 24, 2024.