

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Deidre L. Jefferson, Circuit Court Judge

Appellate Case No.: 2025-001314

RECEIVED
JAN 27 2026
SC Court of Appeals

M. Edward Wilson, Jr.,

Respondent,

v.

Marquee Limo Co., LLC and Paul Brown,

Appellants,

APPELLANT'S AMENDED DESIGNATION OF MATTER ON APPEAL

Appellants respectfully propose the following be included in the Record on Appeal, in addition to the materials to be identified by Respondent:

1. Verdict Form, dated March 19, 2025;
2. Order, dated March 25, 2025;
3. Motion for New Trial, dated March 28, 2025;
4. Order denying Motion for New Trial, dated June 5, 2025;
5. Summons and Complaint, filed June 17, 2022;
6. Marquee Limo's Answer to Complaint, filed July 11, 2022;
7. Transcript of Trial Proceedings, March 17, 2025 to March 19, 2025
8. Plaintiff's Exhibits; 1-7, 15-18, 27;
9. Defendant's Exhibits 1-61;
10. Court's Exhibit 7.

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

Respectfully submitted,

s/Michelle N. Endemann

Michelle N. Endemann (SC Bar #79894)

Jeffrey M. Crudup (SC Bar #100281)

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Attorneys for Appellants

January 16, 2026

Charleston, South Carolina

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v.

M. Edward Wilson, Jr., M.D.,

Respondent.

PROOF OF SERVICE

The undersigned certifies that on January 16, 2026, a copy of Appellant's Memorandum in Opposition to Respondent's Motion to Dismiss for Lack of Subject Matter Jurisdiction and Appellant's Amended Designation of Matter on Appeal and has been served upon counsel of record via electronic mail using the email address listed below:

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[Signature page to follow]

Respectfully Submitted by:

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s/Michelle N. Endemann

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On this 16th day of January 2026
Charleston, SC

Counsel for Appellant



CLARKSON | WALSH | COULTER
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January 16, 2026

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court for the S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: M. Edward Wilson, Jr. v. Marquee Limo Co., LLC, and Paul Brown
Appellate Case No. 2025-001314

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of each of the following for filing:

1. Appellant's Memorandum in Opposition to Respondent's Motion to Dismiss for Lack of Subject Matter Jurisdiction
2. Appellant's Amended Designation of Matter on Appeal
3. Proof of Service

Thank you for your assistance with this matter. Should you have any questions or require further information, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

Clarkson, Walsh & Coulter, P.A.

s/Michelle N. Endemann

Michelle N. Endemann

MNE/tb

Enclosures

cc: Ellis I. Kahn, Esq. (w/enclosure)
Justin S. Kahn, Esq. (w/enclosure)
Wes B. Allison, Esq. (w/enclosure)