

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Hon. Jocelyn Newman, Circuit Court Judge

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Appellate Case No.: 2025-001398

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Christine Ingrid Funk, as Personal Representative of the Estate of Timothy Calhoun,  
Jr..... Appellant,

vs.

Rochelle Graham & Dennis Graham.....Respondent.

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**RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD  
ON APPEAL  
(Rule 209, SCACR)**

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Jason M. Hunter  
Crawford & von Keller, LLC  
Post Office Box 4216  
Columbia, South Carolina 29204  
Telephone 803-790-2626  
ATTORNEYS FOR THE RESPONDENT

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondents, through their undersigned counsel, submits the following to be included in the Record on Appeal:

1. Appellant's Summons and Complaint filed October 2, 2024, in C/A No. 2024-CP-40-05925.
2. Respondents' Amended Answer & Counterclaim & Amended Third-Party Complaint filed December 5, 2024 in C/A No. 2024-CP-40-05925.
3. Respondents' Motion for Summary Judgment, accompanying Affidavits, and Exhibits thereto filed December 16, 2024 in C/A No. 2024-CP-40-05925.
4. Appellant's Memorandum in Opposition to the Granting of Motion for Summary Judgment of Defendants filed April 8, 2025 in C/A No. 2024-CP-40-05925.
5. Form 4 Order and formal Order Granting Respondents' Motion for Summary Judgment filed May 28, 2025, and June 11, 2025, respectively in C/A No. 2024-CP-40-05925.
6. The transcript of the hearing of Respondents' Motion for Summary Judgment held April 17, 2025.

I certify that the above-referenced materials contain reference to no matter which is irrelevant to the instant appeal.

RESPECTFULLY SUBMITTED  
CRAWFORD & VON KELLER, LLC

/s/ Jason M. Hunter

Jason M. Hunter S.C. Bar No.101501  
Post Office Box 4216  
Columbia, South Carolina 29204  
Telephone 803-790-2626  
ATTORNEY FOR THE RESPONDENTS

Columbia, SC  
February 3, 2026

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**PROOF OF SERVICE**

I, Jason Hunter, certify that I have served the foregoing Initial RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL in this matter on February 3, 2026, by mailing it to opposing counsel addressed as follows:

William E. Booth, III, Esquire  
3231 Sunset Boulevard, Suite 'A'  
West Columbia, South Carolina 29169

CRAWFORD & VON KELLER, LLC

/s/ Jason M. Hunter

Jason M. Hunter S.C. Bar No.101501  
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Columbia, South Carolina 29204  
Telephone 803-790-2626  
ATTORNEYS FOR THE RESPONDENTS

Columbia, SC  
February 3, 2026



**CRAWFORD & VON KELLER, LLC**  
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February 3, 2026

**Via Email and Hand-Delivery**

SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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SC Court of Appeals

**RE: Christine Ingrid Funk as Personal Representative of the Estate  
of Richard Timothy Calhoun, Jr. vs. Rochelle Graham and  
Dennis Graham  
Case No: 2024-CP-40-5925  
Our file number: 0252-24-0001**

Dear whom it may concern:

Enclosed please find Respondent's Initial Brief, Designation of Matter and Proof of Service in the above-mentioned matter. Please file accordingly.

Thank you for your assistance. Please contact me with any questions.

Sincerely,  
CRAWFORD & VON KELLER, LLC

  
Tamra Davis, Litigation Paralegal  
for Jason M. Hunter

/tdd  
Enclosures

CC: William E. Booth, III, Esquire  
Booth Law Firm, LLC  
3231 Sunset Boulevard, Suite A  
West Columbia, SC 29169

WE ARE A DEBT COLLECTOR. THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

