

RECEIVED

Feb 05 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
The Honorable R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2024-001911
Circuit Court Case No.: 2020-CP-04-00085

Moats Construction, Inc. and Russell Moats, Appellants,

v.

Anderson County, Rusty Burns, Matt Schell and Holt Hopkins, Respondents,

**RESPONDENTS RUSTY BURNS, MATT SCHELL AND HOLT HOPKINS
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Respondents propose the following matter to be included in the Record on Appeal.

1. All matter designated by the Appellant.
2. Notice of Appeal.
3. Email dated February 24, 2017 (Defendant's Exhibit 3).
4. Email dated April 13, 2017. (Defendant's Exhibit 4).
5. Defendants' Burns, Schell & Hopkins Motion for Summary Judgment and Supporting Memorandum.

I certify that the designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "James W. Logan, Jr.", written over a horizontal line.

James W. Logan, Jr. (SC Bar 3385)
Willson Jones Carter & Baxley
Post Office Box 259
Anderson, South Carolina 29622
864-226-1910
864-226-1931 (fax)
jwlogan@wjcblaw.com

*Attorneys for Respondent Burns, Schell &
Hopkins*

February 5, 2026