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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

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

Case No. 2024-CP-04-02229
Appellate Case No. 2025-001549
Appellate Case No. 2025-002012

Moats Construction, Inc. and The Green Man, LLS, Appellants,

v.

APB Partnership, LLC, Wesley Edwards, 2916 N. Main, LLC, W.H. Bass, Inc.,
Whataburger Restaurants, LLC, and United Community Bank, Respondents.

RESPONDENT'S DESIGNATION OF ADDITIONAL MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal in addition to the material Appellant has designated:

1. Plaintiff's Mechanic's Lien Notice filed July 7, 2024 with Exhibits;
2. Answer, Counterclaims and Cross-Claims filed by Defendant APB on March 10, 2025;
3. Plaintiff's Reply filed April 8, 2025;
4. Defendant APB's Motion to Dissolve Mechanic's Liens, etc., filed April 29, 2025, with Exhibits and Attachments.

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

February 9, 2026

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