

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
Dale E. Van Slambrook, Circuit Judge

Appellate Case No. 2025-001683

Patrick Montgomery,Appellant,

v.

Kanisha Nash,Respondent,

DESIGNATION OF MATTER BY APPELLANT PATRICK MONTGOMERY

Appellant, Patrick Montgomery proposes the following be included in the Record on Appeal:

1. Summons and Complaint filed June 16, 2023.
2. Defendant Patrick Montgomery’s Answer filed July 14, 2023.
3. Plaintiff’s Motion to Compel Responses to Interrogatories and Requests for Production Served on Patrick Montgomery (with Exhibit A) filed September 11, 2023.
4. Letter and Defendant Patrick Montgomery’s Answers to Plaintiff’s First Set of Interrogatories served October 9, 2023.
5. Plaintiff’s Memorandum in Support of Motion to Compel Supplemental Discovery Responses from Patrick Montgomery (with Exhibits A-D) filed December 15, 2023.
6. Letter and Defendant Patrick Montgomery’s Supplemental Responses to Plaintiff’s First Requests for Production served January 22, 2024.
7. Order filed February 2, 2024.

8. Email with supplemental information dated February 8, 2024.
9. Letter and Defendant Patrick Montgomery's Supplemental Answers to Plaintiff's First Set of Interrogatories served February 20, 2024.
10. Plaintiff's Motion to Amend Complaint (with Exhibit A) filed May 22, 2024.
11. Plaintiff's Notice of Motion and Motion for a Rule to Show Cause Why Defendants Patrick Montgomery and Sabrina Montgomery should not be Held in Contempt (with Exhibit A) filed October 24, 2024.
12. Plaintiff's Memorandum in Support of her Motion for a Rule to Show Cause Why Defendants Patrick Montgomery and Sabrina Montgomery should not be Held in Contempt (with Exhibits A-H) filed January 6, 2025.
13. Transcript of proceedings for January 6, 2025.
14. Letter and Defendant Patrick Montgomery's Second Supplemental Answers to Plaintiff's First Set of Interrogatories and Second Supplemental Responses to Plaintiff's First Requests for Production served January 13, 2025.
15. Consent Order Granting Plaintiff's Motion to Amend Complaint filed January 21, 2025.
16. Amended Summons and Amended Complaint filed January 21, 2025.
17. Defendant Patrick Montgomery's Answer to the Amended Complaint filed February 12, 2025.
18. Attestation served March 4, 2025.
19. Order Granting Plaintiff's Motion for Rule to Show Cause filed March 28, 2025.
20. Motion to Protect Defendant's Interests pursuant to Rule 1.14(B) filed April 14, 2025.
21. Plaintiff's Supplemental Memorandum in Support of her Rule to Show Cause against Defendants Patrick Montgomery and Sabrina Montgomery (with Exhibits A-C) filed May 1, 2025.
22. Plaintiff's Motion for Emergency Status Conference (with Exhibit A) filed May 13, 2025.
23. Plaintiff's Motion for Continuance of Hearing on Defendant Patrick Montgomery's Motion to Protect Defendant's Interests Scheduled for May 16, 2025 filed May 13, 2025.

24. Consent Order Granting Plaintiff's Motion for Continuance of Hearing on Defendant Patrick Montgomery's Motion to Protect Defendant's Interests Scheduled for May 16, 2025 filed May 15, 2025.
25. Transcript of proceedings for June 18, 2025.
26. Form 4 Judgement in a Civil Case filed June 20, 2025.
27. Supplemental Order Granting Plaintiff's Motion for Rule to Show Cause filed July 1, 2025.
28. Defendant Patrick Montgomery's Motion to Reconsider filed July 11, 2025.
29. Notice of Motion and Motion to Compel Subpoena Responses filed July 15, 2025.
30. Letter and Defendant Patrick Montgomery's Third Supplemental Answers to Plaintiff's First Set of Interrogatories served July 18, 2025.
31. Defendant Patrick Montgomery's Motion for Additional Time to Institute Guardianship Proceedings (with Exhibits A-E) filed July 18, 2025.
32. Order on Defendant Patrick Montgomery's Motion to Reconsider Alter or Amend filed July 25, 2025.
33. Order Granting Defendant Patrick Montgomery's Motion for Extension of Time to Institute Guardianship Proceedings filed August 25, 2025.

Respectfully submitted,

February 11, 2026

McANGUS, GOUDELOCK & COURIE, LLC

s/Jeffrey Kuykendal
Jeffrey Kuykendal (SC Bar No. 107154)
Post Office Box 30307
6302 Fairview Road, Suite 700
Charlotte, North Carolina 28226
(704) 643-6303
jeffrey.kuykendal@mgclaw.com

Attorney for Appellant Patrick Montgomery