

**RECEIVED**  
**Feb 06 2026**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Jessica A. Salvini, Circuit Court Judge  
Civil Action No. 2024-CP-23-02744

---

Appellate Case No: 2025-001550

---

Bruce Wilson, ....., Appellant

v.

Princeton Rodrigues Williams and Ennis M. Fant, Defendants,

Of Whom Ennis M. Fant....., Respondent.

---

**OBJECTION TO RESPONDENT'S DESIGNATION OF MATTER**

---

Bruce Wilson  
14 Freestone St  
Greenville SC 29605  
(864) 907-7080  
brucewilson23@gmail.com  
**APPELLANT**

**TO: THE CLERK OF THE COURT OF APPEALS OF SOUTH CAROLINA:**

Appellant, Bruce Wilson, pursuant to Rule 209, SCACR, hereby objects to the inclusion of the following documents designated by Respondent in the Record on Appeal. These documents are unnecessary, irrelevant to the core legal issues presented in this appeal, and their inclusion would burden the record with superfluous material.

**OBJECTION TO PARAGRAPH 1: *Appellant's Summons and Complaint, Filed May 6, 2024.***

This document is irrelevant and should be excluded. The original Complaint was dismissed without prejudice by Order dated January 22, 2025, and was superseded in its entirety by the Amended Complaint filed February 11, 2025. The law is clear that an amended pleading replaces the prior pleading, which ceases to be the operative complaint. *Schein v. Lamar*, 284 S.C. 252, 255 (Ct. App. 1985). The issues on appeal relate solely to the legal sufficiency of the Amended Complaint and the Circuit Court's dismissal thereof. The original Complaint has no bearing on this Court's review and should not be included.

**OBJECTION TO PARAGRAPH 2: *Hon. Perry H. Gravely Order, January 22, 2025.***

This Order is irrelevant to the issues presented in this appeal. It pertains solely to the original Complaint, which, as noted above, is no longer operative. The Order granted dismissal without prejudice and allowed amendment—a ruling from which no appeal was taken. The Circuit Court's subsequent review and dismissal of the Amended Complaint under Rule 12(b)(6) required a de novo evaluation of that new pleading. Legal conclusions or analysis pertaining to a superseded pleading are not germane to whether the Amended Complaint stated a claim. Including this Order risks confusion and improperly suggests that deficiencies in the original complaint are relevant to the appeal of the amended one.

**OBJECTION TO PARAGRAPH 4: *Appellant's Second Amended Summons and Complaint, Filed February 28, 2025.***

This document is irrelevant and should be excluded. The Second Amended Complaint was affirmatively withdrawn by Appellant and was never the operative pleading before the Circuit Court at the time of the dismissal order being appealed. The Circuit Court's May 27, 2025, Order explicitly granted Respondent's "Motion to Dismiss Plaintiff's Amended Complaint." The court's analysis was based solely on the allegations contained within the Amended Complaint filed February 11, 2025. A withdrawn pleading that was never ruled upon has no bearing on whether the Circuit Court erred in dismissing the operative Amended Complaint. Its inclusion serves only to confuse the record.

**OBJECTION TO PARAGRAPH 5: *Appellant's Notice to Clerk of Court Regarding Second Amended Complaint, Filed March 31, 2025.***

This ministerial notice is entirely irrelevant to the substantive issues on appeal. This notice merely informed the Clerk of Appellant's intent to withdraw the Second Amended Complaint (the subject of Paragraph 4, above) and reinstate the Amended Complaint. It concerns a transient procedural step that had no impact on the legal sufficiency of the pleadings or the Circuit Court's subsequent legal analysis. Including internal procedural correspondence would add unnecessary bulk to the Record without aiding this Court's review of the dispositive legal errors.

**OBJECTION TO PARAGRAPH 7: *Hon. Jessica A. Salvini Form 4 Order, Filed May 27, 2025.***

The designation is vague, but if this refers to a subsequent or amended dismissal order, it is likely redundant. Respondent has already designated the "Form 4 Order, Filed May 2, 2025" in Paragraph 6, which appears to be the primary dismissal order. The core of this appeal is the legal

sufficiency of the Amended Complaint and the propriety of its dismissal. If the May 27 Order merely reiterates or formally enters the prior ruling, it is cumulative. Only the final, substantive order explaining the court's reasoning is necessary for appellate review. Including multiple orders concerning the same dismissal risks creating confusion and obscuring the specific legal rulings at issue.

**OBJECTION TO PARAGRAPH 9: *Hon. Patrick C. Fant, III Order, August 6, 2025.***

This document is irrelevant to the appeal of the dismissal of claims against Respondent Ennis M. Fant. This order, entered months after the dismissal of Fant, concerns only co-defendant Princeton Rodrigues Williams. The issues on appeal are whether the Amended Complaint stated valid claims against Fant and whether the Circuit Court misapplied the law in dismissing them. Default proceedings against a separate party are a distinct matter. While the default may have circumstantial relevance to the factual background, the order itself is not a necessary component for evaluating the Circuit Court's legal analysis as it pertains to Respondent Fant. Its inclusion is not germane to the appealed judgment.

**CONCLUSION**

Rule 209, SCACR, is intended to create a clear and relevant record for appellate review, not a repository of every document filed in the case. The documents identified above are either superseded, procedural, redundant, or pertain to a non-appealing party. Their inclusion would violate the directive to exclude "irrelevant matter" and would not assist this Honorable Court in resolving the specific legal errors assigned to the dismissal of the Amended Complaint against Respondent Fant.

Appellant respectfully requests that the Clerk sustain these objections and exclude the documents listed in Paragraphs 1, 2, 4, 5, 7, and 9 of Respondent's Designation from the Record on Appeal.

Respectfully submitted,

By: /s/ Bruce Wilson

Bruce Wilson  
14 Freestone St  
Greenville, SC 29605  
brucewilson23@gmail.com

February 7, 2026  
Greenville, South Carolina

**RECEIVED**  
**Feb 06 2026**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Jessica A. Salvini, Circuit Court Judge  
Civil Action No. 2024-CP-23-02744

---

Appellate Case No: 2025-001550

---

Bruce Wilson, ....., Appellant

v.

Princeton Rodrigues Williams and Ennis M. Fant, Defendants,

Of Whom Ennis M. Fant....., Respondent.

---

**PROOF OF SERVICE**

I certify that on February 6, 2026, I served a copy of Appellant's Objection To  
Respondent's Designation Of Matter cc: E-Mail to ctappfiling@sccourts.org and United States

Mail, prepaid and addressed to:

Austin D. Nichols, Esq  
P.O. Box 1452  
Columbia, SC 29202  
Austin@rutherford.law  
**Attorney for Respondent**

By: s/ Bruce Wilson  
Bruce Wilson  
14 Freestone St  
Greenville SC 29605  
brucewilson23@gmail.com  
**Appellant**