

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
Case No. 2022-CP-32-02217

James O. Spence, Circuit Court Judge

Appellate Case No.: 2025-001607

RECEIVED

FEB 19 2026

SC Court of Appeals

Dennis Gilpatrick Apellant

v.

Gregory Lucas Respondent

DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal:

1. Index of Transfer of Magistrate's Court case 2022-CV-32-1100873
2. Order consolidating cases filed December 27, 2023
3. Order referring to Master filed August 23, 2023
4. Final Order filed July 30, 2025
5. Notice of Appeal filed August 11, 2025
6. Lis pendens
7. Summons and Complaint
8. Application for Ejectment Magistrate's Court case 2022-CV-32-1100873
9. Answer and Counterclaim
10. Reply
11. Amended Answer and Counterclaim
12. Reply to Amended Answer and Counterclaim
13. Trial Transcript-May 21,2025
14. Plaintiff Dennis Gilpatrick's Exhibits 1-13
15. Defendant Gregory Lucas's Exhibits 1-17
16. Defendant Gregory Lucas's Deed to 117 Noah Lucas Road
17. Defendant Gregory Lucas's Motion for Summary Judgment filed February 14,2024
18. Defendant Gregory Lucas's Exhibits to Motion for Summary Judgment

RESPECTFULLY SUBMITTED
CRAWFORD & VON KELLER, LLC

s/Theodore von Keller
Theodore von Keller S.C. Bar No.5718
Post Office Box 4216
Columbia, South Carolina 29204
Telephone 803-790-2626
ATTORNEYS FOR RESPONDENT

Columbia, SC
February 19, 2026

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Case No. 2022-CP-32-02217

Hon. James O. Spence, Circuit Court Judge

Appellate Case No.: 2025-001607

Dennis Gilpatrick..... Appellant,

vs.

Gregory Lucas.....Respondent.

PROOF OF SERVICE

I, Theodore von Keller, certify that I have served the foregoing Initial Brief of Respondent in this matter on February 19, 2026, by mailing it to opposing counsel addressed as follows:

Rolf M. Baghdady, Esquire,
Rolf M. Baghdady, P.A.,
118 Cobblestone Court
Chapin, SC 29036

CRAWFORD & VON KELLER, LLC

/s/Theodore von Keller

Theodore von Keller, S.C. Bar No.5718

Post Office Box 4216

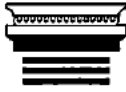
Columbia, South Carolina 29204

Telephone 803-790-2626

ATTORNEY FOR THE RESPONDENT

Columbia, SC

February 19, 2026



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February 19, 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: Dennis Gilpatrick vs. Gregory Lucas
Case No.: 2022-CP-32-02217
Appellate Case No.: 2025-001607
Our Case No. 0064-22-0001

To whom it may concern:

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

Please advise if anything further is required.

Sincerely,

Tamra Davis, Litigation Paralegal for
Theodore von Keller

TVK/tdd

Cc: Rolf M. Baghdady, Esquire
Rolf M. Baghdady, P.A.
118 Cobblestone Court
Chapin, SC 29036

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



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