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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable Thomas William McGee III, Circuit Court Judge

Appellate Case No.: 2025-001912
Civil Action No.: 2024-CP-32-03591

Limitless International Corp.,.....Respondent,

v.

RECO Commercial Systems, LLC f/k/a RECO USA and Dunbar Road, LLC,.....Appellants.

RESPONDENT’S DESIGNATION OF MATTER

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

Orders and Judgments

1. Order Denying Defendants’ Motion to Dismiss (filed 11/05/2024);
2. Order on Plaintiff’s Motion to Compel (filed 05/06/2025);
3. Form 4 Order (filed 06/25/2025);
4. Form 4 Order (filed 07/24/2025);
5. Form 4 Judgment and Order Granting Plaintiff’s Motion for Summary Judgment (filed 08/21/2025);
6. Form 4 Order (filed 09/11/2025);

Pleadings

7. Summons and Complaint (filed 08/27/2024);
 - a. Ex. A – Sales Agreement;
 - b. Ex. B – Purchase Order;
 - c. Ex. C – News Release;

- d. Ex. D – Letter from Butcher;
- e. Ex. E – Verified Statement of Account;

Motions

- 8. Motion to Dismiss (filed 09/12/2024);
 - a. [omitting Ex. A as identical to item 7.a above];
 - b. [omitting Ex. B as identical to item 7.c above];
 - c. [omitting Ex. C as identical to item 7.d above];
- 2. Plaintiff’s Motion to Compel Defendants RECO Commercial Systems, LLC f/k/a RECO USA & Dunbar Road, LLC
 - a. Ex. A – Rule 11 Letter;
- 9. Defendant RECO Commercial Systems, LLC and Dunbar Road LLC’s Motion to Reconsider (filed 11/15/2024);
- 10. Plaintiff’s Notice of Motion and Motion for Summary Judgment against Defendants RECO Commercial Systems, LLC f/k/a RECO USA & Dunbar Road, LLC (filed 1/16/2025);
 - a. Ex. A – Affidavit of Mohammad Alkarmi;
- 11. Plaintiff’s Memorandum in Support of Plaintiff’s Motion for Summary Judgment (filed 04/14/2025);
 - a. [omitting Ex. A as identical to item 7.a above];
 - b. [omitting Ex. B as identical to item 7.b above];
 - c. Ex. C – Email from Platt;
 - d. Ex. D – Executed Asset Purchase Agreement;
 - e. Ex. E – Letter from Alkarmi;
 - f. Ex. F – Email from Alkarmi;
- 12. Defendant’s Memorandum in Opposition to Plaintiff’s Motion for Summary Judgment (filed 04/14/2025);
 - a. Ex. A – Draft Asset Purchase Agreement with Schedules;
- 13. [First] Affidavit of William E. Newbaur III (filed 04/14/2025);
- 14. [Second] Affidavit of William E. Newbaur III (filed 06/23/2025);
 - a. [omitting Ex. A as identical to item 7.a above];
 - b. [omitting Ex. B as identical to item 7.b above];
 - c. [omitting Ex. C as identical to item 11.f above];
 - d. Ex. D – SC SOS entry for RECO Commercial Systems LLC;
 - e. [no filed Ex. E];

- f. [omitting Ex. F as identical to item 10.a above];
 - g. Ex. G – Stipulation of Dismissal;
15. Supplemental Argument on Behalf of Defendant RECO Commercial Systems, LLC (filed 07/01/2025);
16. Plaintiff’s Reply to the Supplemental Argument of Defendant RECO Commercial Systems, LLC (filed 07/03/2025);
- a. [omitting Ex. A as identical to item 7.a above];
 - b. [omitting Ex. B as identical to item 7.b above];
 - c. [omitting Ex. C as identical to item 11.c above];
 - d. [omitting Ex. D as identical to item 11.f above];
 - e. [omitting Ex. E as identical to item 10.a above];
 - f. [omitting Ex. F as identical to item 11.d above];
 - g. [omitting Ex. G as identical to item 11.e above];
 - h. Ex. H – Schedule 3.26 Bank Accounts;
 - i. Ex. I – Bank Statement from BB&T;
17. Motion to Alter or Amend (filed 08/29/2025);
18. Plaintiff’s Reply to the Motion to Alter or Amend Filed by Defendants (filed 09/08/2025);
- a. [omitting Ex. A as identical to item 10.a above];
 - b. [omitting Ex. B as identical to items 11 and 11.a-f above];
 - c. [omitting Ex. C as identical to items 16 and 16.a-i above]; and

Transcripts

19. Motion Hearing Transcript dated June 24, 2025.

[continued next page]

CERTIFICATION OF COUNSEL

In accordance with Rule 209(c), SCACR, the undersigned counsel certifies that this Designation of Matter contains no matter which is irrelevant to the appeal.

s/ Chelsea J. Clark

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