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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Circuit Court

APPEAL FROM GREENVILLE COUNTY
Probate Court

Joshua L. Queen, Probate Judge

Appellate Case No. 2024CP2304068

James Marshall Shoemaker, III.....Appellant

v.

Lesley R. Moore, Esq. as Personal Representative and Trustee,
Edward Sloan Shoemaker and Jonathan Evans Shoemaker.....Respondents

RESPONDENTS' DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondents propose the following be included in the Record on Appeal:

1. Summons and Petition in probate court filed 7/24/20
2. Respondents' Response to Petition in probate court filed 8/18/20
3. Motion to Dismiss with exhibits filed 6/18/21
4. Petitioner's Response to Motion to Dismiss filed 6/29/21
5. Memorandum in Support of Motion to Dismiss filed 7/13/21
6. Notice of Motion and Motion to Compel filed 12/3/21
7. Notice of Representation in probate court filed 4/11/22
8. Letter from Knox Haynsworth to Will McKibbon dated 6/30/22
9. Letter from Knox Haynsworth to Judge Queen dated 2/24/23

10. Order of Judge Queen dated 3/10/23
11. Letter from Knox Haynsworth to Judge Queen with exhibits dated 3/22/23
12. Email from Knox Haynsworth regarding documents dated 3/23/23
13. Motion for Sanctions with exhibits filed 4/6/23
14. Interrogatory answers attached to the email dated 4/2/24
15. Transcript from Motion for Sanctions hearing in Probate Court on 4/3/24
16. Order Granting Motion for Sanctions dated 5/17/24
17. Motion to Reconsider, Alter or Amend Order Granting Respondents' Motion for Sanctions dated 5/28/24
18. Respondents' Response to Petitioner's Motion to Reconsider dated 6/11/24
19. Order Denying Motion to Reconsider dated 6/20/24
20. Petition for Formal Hearing, case no: 2018ES2301729
21. Order, case no: 2018ES2301729 (Dec. 15, 2021)
22. Order of the Supreme Court of South Carolina (Feb. 1, 2022)
23. Respondents First Set of Interrogatories and requests for Production
24. Letter from Knox Haynsworth (July 25, 2022)
25. Petitioner's Response to Respondents' Interrogatories and Requests for Production of Documents
26. Email sent by Petitioner's Counsel on April 2, 2024
27. Email from M. Cason King to Appellant's Counsel on May 23, 2024
28. Respondents' Motion to Strike, Amend or Supplement the Record on Appeal filed on December 11, 2024
29. Appellant's Notice of Appeal to Circuit Court

30. Appellant's Statement of Issues on Appeal
31. Appellant's Brief to Circuit Court
32. Respondent's Brief to Circuit Court
33. Order of the Circuit Court, Judge McMaster, filed April 30, 2025
34. Order of the Circuit Court, Judge Morgan, filed December 15, 2025
35. Transcript from the Circuit Court Hearing on November 18, 2025

Respondents' counsel hereby certifies that this Designation contains no matter which is irrelevant to the appeal

Respectfully submitted,
**BROWN, MASSEY, EVANS,
McLEOD & HAYNSWORTH,
LLC**

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