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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Charles B. Simmons, Jr., Circuit Court Judge
The Honorable Alex Kinlaw, Jr., Circuit Court Judge
The Honorable William C. McMaster, III

Appellate Case No. 2026-000524

Timothy Jones as the Personal Representative for Dewitt Jones.....Appellant,

v.

Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A.
Flanagan, Jr., and Marion L. Snyder..... Respondents.

**APPELLANT'S DESIGNATION OF MATTER FOR
INCLUSION IN THE RECORD ON APPEAL**

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Personal Representative for Dewitt Jones*

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Appellant Timothy Jones as the Personal Representative for Dewitt Jones ("Appellant") hereby designates the following materials to be included in the Record on Appeal in this matter in connection with its Initial Brief of Appellant. Each item designated **is to include all attachments or exhibits** to the original of the referenced item. Appellant intends to designate each and every item from the record that it cites in its Initial Brief of Appellant in this matter. Appellant expressly reserves the right to seek supplementation of the record pursuant to Rules 209 and 212, SCACR if appropriate.

Appellant designates the following matters for inclusion in the Record on Appeal (including any and all exhibits or attachments thereto):

1. January 3, 2023 Plaintiff's Complaint and Summons
2. September 15, 2023 Defendants' Answer and Counterclaims to Plaintiff's Complaint
3. March 4, 2024 Plaintiff's Motion to Compel
Ex. A: Plaintiff's Discovery Requests
Ex. B: February 15, 2024 Letter from Attorney Puriefoy to Attorney bach
4. October 7, 2024 Hearing Transcript
5. October 14, 2024 Order (Honorable Alex Kinlaw, Jr.)
6. October 24, 2024 Plaintiff's Motion to Alter and Amend
7. October 24, 2024 Plaintiff's Memorandum in Support of Plaintiff's Motion to Alter or Amend
Ex. A: Summary Valuation Report as to June 11, 2021
Ex. B: Luxor Scientific, LLC Sales by Customer Summary (January, 2021 to December, 2021)
Ex. C: Deposition Excerpt Timothy James Jones
8. November 6, 2024 Order Denying Plaintiff's (sic) Rule 59(e) Motion (Honorable Alex Kinlaw, Jr.)

9. February 12, 2025 Defendants' Motion for Protective Order
Ex. A: Order Denying Plaintiff's Motion to Compel
Ex. B: Plaintiff's Amended Notice of 30(b)(6) Topics Innovative Scientific Solutions
Ex. C: January 28, 2025 Letter from Attorney Bach to Attorney Puriefoy
10. April 1, 2025 Form 4 Order granting Defendants' Motion for Protective Order (Honorable William C. McMaster, III)
11. April 16, 2025 Order (Honorable William C. McMaster, III)
12. April 28, 2025 Plaintiff's Motion to Reconsider
13. May 23, 2025 Form 4 Order (Honorable William C. McMaster, III)
14. July 16, 2025 Defendants' Motion for Summary Judgment
15. September 15, 2025 Sworn Affidavit of Timothy Jones
16. September 15, 2025 Defendants' Memorandum in Support of Motion for Summary Judgment
Ex. A: Excerpt Rule 30(b)(6) Deposition (Ryan Flanagan)
Ex. B: Excerpt Deposition of Timothy Jones
17. September 15, 2025 Plaintiff's Memorandum of Law in Opposition to Motion for Summary Judgment
18. September 17, 2025 Plaintiff's Letter filing exhibits
Ex. A: August 3, 2022 email chain
Ex. B: September 8, 2022 email chain
Ex. C: Excerpt of Deposition of Timothy Jones
Ex. D: Sept. 9, 2022 and August 10, 2022 email chain
Ex. E: Excerpt of Deposition of Timothy Jones
Ex. F: October 21, 2022 (and prior) email chain
19. September 17, 2025 Hearing Transcript (p. 3)
20. December 12, 2025 Defendants' Supplemental Memorandum in Support

of Motion for Summary Judgment

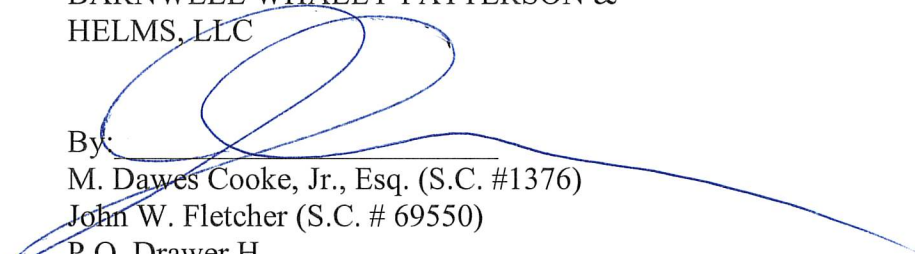
Ex. A: Deposition of Mark Swanson

Ex. B: Mark Swanson Retainer Letter

21. December 17, 2025 Hearing Transcript (p. 12)
22. January 21, 2026 Order Granting Defendants' Motion for Summary Judgment (Honorable Charles B. Simmons)
23. January 30, 2026 Plaintiff's Motion to Reconsider and Request for Clarification
24. February 4, 2026 Form 4 Order (Honorable Charles B. Simmons)
25. March 4, 2026 Notice of Appeal (and all Exhibits thereto)
26. Amended and Restated Operating Agreement (submitted to the trial court under seal)

Appellant certifies, pursuant to S.C.A.C.R., Rule 209(c), that the designations set forth above are relevant to the appeal in this matter, and that it has not designated any matter that is irrelevant to the issues before the Court.

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