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Jun 17 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Appellant Case No. 2025-002050
Lower Court Case No. 2017-CP-42-02374

Richard Lewis and Walter LewisRespondents/Appellants,

v.

Robert M. Errato, Quinnipiac Associates, Inc. and Upwards Builders, Inc., Defendants,

Of Which Robert M. Errato.....Appellant/Respondent.

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Respondents/Appellants propose the following to be included in the Record on Appeal:

1. Summons and Complaint, filed July 13, 2017
2. Amended Summons and Complaint, filed November 17, 2017
3. Divorce Deposition Transcript of Robert M. Errato., Full Version (Pages 1-73), dated June 22, 2018
4. Order Dated September 7, 2018 — Hon. J. Mark Hayes
5. Order Dated July 11, 2019 — Hon. Grace Knie
6. Connecticut Complaint Against Governor, filed December 16, 2022
7. Deposition Transcript of Richard Lewis., Condensed Version (Pages 1-169 plus All Exhibits), dated November 20, 2023

8. Deposition Transcript of Robert M. Errato., Condensed Version (Pages 1-146 plus All Exhibits), dated February 19, 2024
9. Order Dated June 9, 2025 – Hon. McCutchen
10. Plaintiffs’ Motion for Partial Summary Judgment, filed September 16, 2025
11. Plaintiffs’ Motion for Injunction, filed September 17, 2025
12. Plaintiffs’ Motion to Compel and Rule to Show Cause (Including All Exhibits), filed September 17, 2025
13. Plaintiffs’ Brief in Support of Motion for Injunction (Including Exhibits A-M), filed September 23, 2025
14. Plaintiffs’ Brief in Support of Motion for Partial Summary Judgment (Including Exhibits A-L), filed September 23, 2025
15. Plaintiffs’ Brief in Support of Motion to Compel and Rule to Show Cause (Including All Exhibits), filed September 23, 2025
16. Order Dated September 30, 2025 – Hon. Grace Knie
17. Plaintiffs’ Motion to Reconsider Injunction and Constructive Trust, filed October 09, 2025
18. Transcript of Record of Hearing held October 9, 2025
19. Order Dated October 27, 2025 — Hon. Grace Knie
20. Plaintiffs’ Brief in Support of Motion to Reconsider Injunction and Constructive Trust (Including Exhibits A-AA), filed October 30, 2025
21. Order Dated November 3, 2025
22. Notice of Appeal, filed December 2, 2025

s/ Jason M. Imhoff

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and Walter Lewis*

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PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondents/Appellants Richard Lewis and Walter Lewis and Respondents/Appellants' Designation of Matter to be included on the Record on Appeal on Appellant/Respondent Richard M. Errato by electronic mail, on June 17, 2026, addressed to Appellant/Respondent Richard M. Errato, 3000 Whitney Avenue, PMB 109, Hamden, CT, 06518, boberrato@gmail.com.

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