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Jun 29 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
The Honorable Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2025-002197
Civil Action No. 2024-CP-10-04878

Thomas Scott Jackson,
Respondent,

v.

Candelabra, Inc. d/b/a Meadow Blu d/b/a Lyndon Leigh and
Whitney Moore,
Appellants.

**RESPONDENT'S DESIGNATION OF MATTER
FOR THE RECORD ON APPEAL**

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June 29, 2026 Charleston,
South Carolina

Respondent Thomas Scott Jackson, pursuant to Rule 209, SCACR, designates the following matter for inclusion in the Record on Appeal. Respondent adopts Appellants' Designation of Matter for the Record on Appeal to the extent the materials identified therein are necessary to the issues on appeal. Respondent further designates the following materials, or specifically identifies the following materials within the items already designated by Appellants, to ensure the Record on Appeal contains all matter necessary for review of the issues raised in this appeal.

Counsel for Respondent certifies, pursuant to Rule 209(c), SCACR, that this designation contains no matter that is irrelevant to this appeal.

I. ORDERS

1. Form 4 Order re. Judgment, February 13, 2025.
2. Order of Default Judgment against Candelabra, February 13, 2025.
3. Execution of Judgment against Candelabra, February 13, 2025.
4. Order Denying Candelabra's Motion to Vacate and Granting Plaintiff's Motion to Dismiss Moore's Counterclaims, August 19, 2025.
5. Form 4 Order Denying Defendants' Motion to Reconsider, Alter or Amend, September 30, 2025.
6. Order of Reference to Master-in-Equity for Supplemental Proceedings, October 8, 2025.

II. PLEADINGS AND SERVICE MATERIALS

7. Summons and Complaint, September 28, 2024, including all exhibits and attachments.
 - A. Employment Contract, July 31, 2023.
 - B. Letter from LLR, June 14, 2024.

8. Plaintiff's Proof of Service reflecting service of the Summons and Complaint on Candelabra on October 1, 2024, filed October 9, 2024, including certified-mail documentation and return receipt.
9. Moore's Answer and Counterclaims, with exhibit, April 28, 2025.
10. Plaintiff's Affidavit of Service, April 1, 2025.

III. MOTIONS, MEMORANDA, AND SUPPORTING MATERIALS

11. Plaintiff's Motion for Entry of Default Judgment against Candelabra, Inc. d/b/a Meadow Blu d/b/a Lyndon Leigh, with exhibits, November 5, 2024.
 - A. Candelabra Secretary of State information.
 - B. Certified mail receipt and letter to Candelabra.
 - C. Affidavit of Thomas Scott Jackson, November 5, 2024.
 - D. Affidavit of Attorney's Fees.
12. Candelabra's Motion to Vacate Default and Default Judgment, April 1, 2025.
13. Plaintiff's Motion to Dismiss Moore's Counterclaims, May 22, 2025.
14. Plaintiff's Petition for Supplemental Proceedings, with exhibits, June 11, 2025.
 - A. Form 4 Order re. Judgment, February 13, 2025, and Order of Default Judgment against Candelabra, February 13, 2025.
 - B. Judgment marked nulla bona.
15. Plaintiff's Memorandum in Support of Motion to Dismiss Moore's Counterclaims, June 29, 2025.
16. Candelabra's Memorandum in Support of Motion to Vacate, with exhibits, July 1, 2025.
17. Moore's Memorandum in Opposition to Plaintiff's Motion to Dismiss Moore's Counterclaims, with exhibits, July 1, 2025.

18. Plaintiff's Memorandum in Opposition to Candelabra's Motion to Vacate, with exhibits, July 8, 2025.

A. Affidavit of Claire Huff, including all attachments.

- i. Candelabra pay record / paystub attached to the Affidavit of Claire Huff.
- ii. Text-message attachment to the Affidavit of Claire Huff reflecting communication concerning the envelope containing the Summons and Complaint.

B. Notice of Default letter, November 21, 2024, and Notice of Default email, November 22, 2024.

C. Process Server Affidavit, January 20, 2025.

D. Process Server Affidavit, April 11, 2025.

E. Affidavit of Thomas Scott Jackson, July 28, 2025.

F. Email from Moore to Plaintiff, March 27, 2024.

G. Letter to Defendants Moore and Candelabra concerning demand and records preservation, August 6, 2024.

H. Email to Moore, August 12, 2024.

I. Email to Moore, August 26, 2024.

J. Email to Moore, August 30, 2024.

K. Letter and email to Whitney Moore enclosing or providing notice of the Order of Default Judgment, February 13, 2025.

L. Secretary of State information regarding Walmart, Inc.

M. Secretary of State information regarding Charleston Adult Baseball League.

- N. Email from Mona Flinn to Claire Huff concerning collection of mail or packages at the Long Grove Road address, January 9, 2025.
- 19. Plaintiff's Supplemental Documents to Support Plaintiff's Memorandum in Opposition to Defendant's Motion to Vacate, with exhibits, July 25, 2025.
 - A. Excerpt of July 8, 2025 hearing.
 - B. Email from Claire Huff, July 25, 2025.
 - C. Affidavit of Madison Barrett.
 - i. Preservation letter attached to the Affidavit of Madison Barrett, August 6, 2024.
- 20. Candelabra's Reply Memorandum in Support of Motion to Vacate, with exhibits, July 25, 2025.
- 21. Defendants' Notice of Motion and Motion to Reconsider, Alter, or Amend the August 19, 2025 Order denying Candelabra's Motion to Vacate and granting Plaintiff's Motion to Dismiss Moore's Counterclaims, August 29, 2025.
- 22. Plaintiff's Memorandum in Opposition to Defendants' Motion to Reconsider, September 18, 2025.
- 23. Plaintiff's Petition for Supplemental Proceedings, with exhibits, October 1, 2025.
 - A. Form 4 Order re. Judgment, February 13, 2025, and Order of Default Judgment against Candelabra, February 13, 2025.
 - B. Judgment marked nulla bona.

IV. SPECIFIC EXHIBITS AND SUPPORTING MATERIALS DESIGNATED BY RESPONDENT

To the extent the following materials are not separately included within the broader "with exhibits" designations above, Respondent specifically designates them for inclusion in the Record on Appeal:

- 24. Affidavit of Whitney Moore submitted in support of Candelabra's Motion to Vacate.
- 25. Affidavit of Mona Flinn submitted in support of Candelabra's Motion to Vacate.
- 26. Affidavit of Service on Whitney Moore, March 30, 2025.

V. TRANSCRIPTS

- 27. Default Hearing Transcript, December 17, 2024.
- 28. Hearing Transcript, August 4, 2025.
- 29. Hearing Transcript, July 8, 2025.

Respectfully submitted,

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