

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

THE HONORABLE DANIEL COBLE, CIRCUIT COURT JUDGE

Case No. 2026-00736

Kenneth B. Loveless,Appellant,

v.

Kevin Scully, Edward K. White, Flora E. “Beth” Hutchison, Michael Montgomery, and Beatrice
Dennis-White, Respondents.

**RESPONDENT BEATRICE DENNIS-WHITE’S DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Respondents, by and through counsel, hereby designate the
following materials for inclusion in the Record on Appeal:

1. March 14, 2022, Summons and Complaint
2. January 31, 2024, Amended Summons and Complaint
3. July 25, 2025, Order Granting Plaintiff’s Motion to Amend Complaint
4. November 15, 2024, Motion for Second Amended Complaint
5. October 10, 2025, Beatrice Dennis-White’s Supplemental Addendum to Motion to Dismiss
6. March 22, 2025, Form 4 Order
7. December 23, 2024, Motion to Quash Subpoena Directed to Bea White
8. January 20, 2025, Supplemental Motion for Second Amended Complaint
9. March 4, 2025, Consent Withdrawal and Substitution of Counsel

10. May 13, 2025, Bea White's Motion to Intervene
11. July 29, 2025, Bea White's Motion for Reconsideration
12. August 8, 2025, Second Amended Complaint
13. August 12, 2025, Bea White's Motion to Dismiss
14. September 5, 2025, Bea White's Answer
15. February 9, 2026, Form 4 Order
16. February 25, 2026, Order Granting Defendant Beatrice Dennis-White's Motion to Dismiss
17. March 16, 2026, Order Denying Plaintiff's Motion for Reconsideration
18. March 24, 2026, Notice of Appeal

Respectfully submitted,

s/ Robert M. Peele, III

Robert M. Peele, III, Bar No. 77569

E-Mail: RPeele@TurnerPadget.com

Turner Padget Graham and Laney P.A.

1901 Main Street

Suite 900

Columbia, South Carolina 29201

Telephone: (803) 254-2200

Fax: (803) 799-3957

Dated: July 29, 2026

Attorney for Beatrice Dennis-White