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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

Jane H. Merrill, Circuit Court Judge

Appellate Case No.: 2025-002252

T. Cox Builders, LLCAppellant,

v.

Piedmont Vacant Properties, LLC and Watson Engineering, Inc. Respondents.

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

Respondents Piedmont Vacant Properties, LLC and Watson Engineering, Inc., through undersigned counsel and pursuant to Rule 209, SCACR, hereby designate the following matter which was before the lower tribunal and is relevant to the appeal to be included in the Record on Appeal. In addition to the matter designated by Appellant, Respondents designate the additional matter set forth below. Respondents reserve the right to supplement these designations in accordance with the South Carolina Appellate Court Rules. All designated matter does not include proofs of service unless otherwise specified.

MATTER DESIGNATED BY APPELLANT

DATE	DOCUMENT
07/17/2023	Summons and Complaint
08/21/2023	Defendants' Answer and Counterclaims
09/20/2023	Plaintiff's Reply to Counterclaims
07/08/2025	Transcript of the Non-Jury Trial held July 8–10, 2025 (Hon. Jane H. Merrill; Court Reporter Lisa Scott), including Plaintiff's end-of-trial Motion to Stay pursuant to S.C. Code Ann. § 40-59-830
07/10/2025	Trial Exhibits admitted into evidence (Plaintiff's Exhibits 1–12 and Defendants' Exhibits 1–18)
09/09/2025	Order Granting Relief to Defendants & Denying Relief to Plaintiff, together with the Form 4 Judgment in a Civil Case (Hon. Jane H. Merrill)
09/19/2025	Plaintiff's Motion to Reconsider, Alter or Amend pursuant to Rule 59(e), SCRCP
09/30/2025	Defendants' Memorandum in Opposition to Plaintiff's Motion to Reconsider, Alter or Amend
10/06/2025	Order (Form 4) Denying Plaintiff's Motion to Reconsider, Alter or Amend
11/03/2025	Notice of Appeal

ADDITIONAL MATTER DESIGNATED BY RESPONDENTS

DATE	DOCUMENT
10/17/2025– 10/22/2025	E-mail thread between Miranda Shipman Law, LLC and Respondents' Counsel
10/22/2025	E-mail from Attorney Townes B. Johnson III to Respondents' Counsel
10/27/2025	Satisfaction of Judgment
03/23/2026	Respondents' Motion to Dismiss Appeal
04/13/2026	Order Denying Respondents' Motion to Dismiss Appeal
08/6/2026	Affidavit of Tom Scott

Respectfully submitted,

MOORE & VAN ALLEN PLLC

/s/ Lauren Vriesinga

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*Attorneys for Respondents Piedmont Vacant
Properties, LLC and Watson Engineering, Inc.*

August 7, 2026
Charleston, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2026, I electronically served a copy of the foregoing Respondents' Designation of Matter to Be Included in the Record on Appeal upon the following counsel of record:

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