

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

Sep 11 2026

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Daniel M. Coble, Circuit Judge

Appellate Case No. 2026-000736

Kenneth B. Loveless, Appellant.

v.

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

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent Kevin Scully proposes the following to be included in the record
on appeal:

1. Each of the orders Appellant has appealed in the underlying action;
2. Order denying motion to reconsider as to Scully;
3. Summons and complaint;
4. Amended complaint;
5. Second amended complaint;
6. Motion to dismiss or strike second amended complaint;
7. Motion to compel second deposition;
8. Motion to deem requests to Scully admitted;
9. Motion for second amended complaint;
10. Supplemental motion for second amended complaint;
11. Motion to reconsider as to Scully;
12. Transcript of hearing held February 3, 2026;
13. Transcript of Appellant’s deposition;
14. Scully’s memorandum in opposition to motion to compel second deposition;
15. Scully’s memorandum in support of motion to dismiss or strike;
16. All requests to admit filed October 29, 2025;

17. Any other matter presented to the lower court which was cited in Respondent Scully's brief but inadvertently omitted from this designation; and
18. All documents designated for inclusion in the record on appeal include their exhibits/attachments, unless otherwise noted.

I certify this designation contains no matter that is irrelevant to this appeal.

Respectfully submitted,

/s/ Andrew S. Radeker

Andrew S. Radeker

S.C. Bar No. 73743

Radeker Law, P.A.

6511 Dare Circle

Columbia, South Carolina 29206

(803) 500-0891

drew@radekerlaw.com

and

Taylor M. Smith IV

S.C. Bar No. 101584

Meriwether Law, LLC

923 Calhoun Street

Columbia, South Carolina 29201

(803) 779-2211

taylor@harrisonfirm.com

Attorneys for Respondent Kevin Scully

September 11, 2026