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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Charles B. Simmons, Jr., Circuit Court Judge

Appellate Case No. 2026-000524

Timothy Jones as the Personal Representative for Dewitt Jones.....Appellant,

v.

Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A.
Flanagan, Jr., and Marion L. Snyder..... Respondents.

RESPONDENTS' DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON
APPEAL

Respectfully submitted,

s/ Adam C. Bach

Adam C. Bach (#74885)
TONNSEN BACH, LLC
1306 South Church Street
Greenville, SC 29605
Telephone: (864) 236-5013
Facsimile: (864) 312-4191
abach@tonnsenbach.com

Attorneys for Respondents

September 11, 2026
Greenville, South Carolina

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondents Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder (“Respondents”) hereby designates the following materials to be included in the Record on Appeal in this matter in connection with its Initial Brief of Respondents (“Initial Brief”). Each item designated is to include all attachments or exhibits to the original of the referenced item. Respondents intend to designate each and every item from the record that it cites in its Initial Brief in this matter. Respondents expressly reserves the right to seek supplementation of the record pursuant to Rule 209 and 212, SCACR.

Respondents designates the following matters for inclusion in the Record on Appeal (including any and all exhibits or attachments thereto):

1. January 3, 2023, Plaintiff’s Complaint and Summons
2. September 15, 2023, Defendants’ Answer and Counterclaims to Plaintiff’s Complaint
3. September 26, 2023, Plaintiff’s First Set of Interrogatories to Defendants
4. September 26, 2023, Plaintiff’s First Set of Requests for Production to Defendants
5. November 17, 2023, Defendants’ First Set of Interrogatories to Plaintiff
6. November 17, 2023, Defendants’ First Requests for Production to Plaintiff
7. November 17, 2023, Defendants’ First Requests for Admission to Plaintiff
8. March 6, 2024, Plaintiff’s Motion to Continue Trial
9. September 5, 2024, Deposition of Timothy James Jones
10. February 11, 2025, 30(b)(6) Deposition of J. Ryan Flanagan
 - a. Ex. 9: Amended Notice of 30(b)(6) Topics
11. April 3, 2025, Confidential Deposition of Alex Hartel
12. February 5, 2025, Plaintiff’s Second Set of Interrogatories to Defendants

13. February 5, 2025, Plaintiff's Second Set of Requests for Production to Defendants
14. April 23, 2025, Plaintiff's Supplemental Responses to Defendants' Requests for Production to Plaintiff
15. April 24, 2025, Subpoena to Greer Walker
16. April 24, 2025, Letter from Plaintiff's Counsel, Devon M. Puriefoy to Greer Walker
17. July 18, 2025, Defendants' Motion to Compel Subpoena Response From Plaintiff and/or Greer Walker
 - a. Ex. A: April 24, 2025, Subpoena to Greer Walker
 - b. Ex. B: April 24, 2025, Letter from Plaintiff's Counsel, Devon M. Puriefoy to Greer Walker
 - c. Ex. C: July 9, 2025 email chain
 - d. Ex. D: July 15, 2025 email chain
18. July 16, 2025, Motion for Summary Judgment of Defendants
 - a. Ex. A: Amended and Restated Operating Agreement (submitted to the trial court under seal)
 - b. Ex. B: Deposition Excerpt Timothy James Jones
 - c. Ex. C: Confidential Deposition Excerpt Alex Hartel (submitted to the trial court under seal)
 - d. Ex. D: Deposition Excerpt J. Ryan Flanagan
 - e. Ex. E: October 1, 2022 Promissory Note (submitted to the trial court under seal)
19. July 17, 2025, Plaintiff's Motion for Continuance

20. July 22, 2025, Defendant's Memorandum in Opposition to Plaintiff's Motion to Continue
 - a. Ex. A: July 15, 2025 Email Chain
21. August 7, 2025, Consent Order to Refer Case to Master in Equity
22. September 15, 2025, Memorandum in Support of Defendants' Motion for Summary Judgment
 - a. Ex. A: Rule 30(b)(6) Deposition Excerpt (Ryan Flanagan)
 - b. Ex. B: Deposition Excerpt Timothy James Jones
23. September 15, 2025, Memorandum of Law in Opposition of Defendant's Motion for Summary Judgment
24. September 17, 2025, Hearing Transcript
25. October 17, 2025, Deposition of Mark Swanson
 - a. Ex. 3: August 5, 2022 Mark Swanson Retainer Letter
26. November 6, 2024, Order Denying Plaintiff's Rule 59 Motion
27. December 12, 2025, Defendants' Supplemental Memorandum in Support of Defendants' Motion for Summary Judgment
 - a. Ex. A: Deposition of Mark Swanson
 - b. Ex. B: Mark Swanson Retainer Letter
28. January 21, 2026, Order Granting Defendants' Motion for Summary Judgment
29. February 4, 2026, Form 4 Order
30. March 4, 2026, Notice of Appeal (and all Exhibits thereto)
31. Amended and Restated Operating Agreement (filed under seal)
32. October 7, 2024, Hearing Transcript

33. June 13, 2024, Plaintiff's Motion to Compel

a. Ex. A: Plaintiff's First Set of Interrogatories and First Set of Requests for Production, dated September 26, 2023.

b. Ex. B: February 15, 2024 Letter from Devon Puriefoy to Adam Bach

34. February 12, 2025 Defendants' Motion for Protective Order

a. Ex A: September 14, 2024 Order (Judge Kinlaw)

b. Ex B: January 27, 2025 Amended Notice of 30(b)(6) Topics Innovative Scientific Solutions

c. Ex C: Letter from Adam Bach, Attorney for Respondents, to Devon Puriefoy, Attorney for Appellant, January 28, 2025

d. Ex. D: 30(b)(6) Deposition Excerpt (J. Ryan Flanagan)

35. April 16, 2025, Order/Protective Order

36. September 15, 2025, Sworn Affidavit of Timothy Jones

37. October 14, 2024, Order

38. May 23, 2025 Form 4 Order

Respondents certify, pursuant to S.C.A.C.R., Rule 209(c), that the designation set forth above are relevant to the appeal in this matter and that it has not designated any matter that is irrelevant to the issues before the Court.

Signature page follows

s/Adam C. Bach

Adam C. Bach (#74885)
TONNSEN BACH, LLC
1306 South Church Street
Greenville, SC 29605
Telephone: (864) 236-5013
Facsimile: (864) 312-4191
abach@tonnsenbach.com

Attorney for Respondents

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