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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Courtney Clyburn Pope, Circuit Court Judge

Appellate Case No. 2026-001628

Ann Louise Gibbs-Hunter and Raymond D. Gibbs, Jr., Appellants / Plaintiffs,

v.

Rilion Gracie Greenville, LLC, and TNB Financial Services, as Trustee of Gene Mark Brown's Trust B-2 under The Doris P. Brown Revocable Trust Agreement Dated February 9, 2006, as Amended, Respondents / Defendants.

RESPONDENT TNB'S DESIGNATION OF MATTER

Pursuant to South Carolina Appellate Court Rule 209, Respondent TNB hereby submits that the following items are relevant to the pending appeal in this matter and therefore should be included in the Record on Appeal:

1. Plaintiffs'/Appellants' Complaint, filed on September 20, 2024
2. Plaintiffs'/Appellants' Amended Complaint, filed on October 18, 2024
3. Defendant/Respondent RGG's Motion for Summary Judgment, filed on October 21, 2025
4. Plaintiffs'/Appellants' Motion to Alter or Amend the Complaint, filed on October 29, 2025

5. Plaintiffs'/Appellants' Proposed Amended Complaint, filed with their Motion to Alter or Amend the Complaint
6. Transcript of Hearing on Defendant/Respondent RGG's Motion for Summary Judgment and Plaintiffs'/Appellants' Motion to Alter or Amend the Complaint, held on December 10, 2025
    a. Pgs. 269-270, and 279-280 of the preliminary ROA filed on Appellants on September 8, 2026
7. Order of Judge Courtney Clyburn Pope on Defendant/Respondent RGG's Motion for Summary Judgment and Plaintiffs'/Appellants' Motion to Alter or Amend the Complaint, dated June 4, 2026
    a. Pg. 8
8. Plaintiffs'/Appellants' Motion to Reconsider, filed on June 12, 2026
9. Order of Judge Courtney Clyburn Pope on Plaintiffs'/Appellant's Motion to Reconsider, dated June 25, 2026
10. Plaintiffs'/Appellants' Notice of Appeal
11. Affidavit of Raymond D. Gibbs, Jr.
    a. Pg. 2
12. Affidavit of Ann Louise Gibbs-Hunter
    a. Pgs. 1-2
13. Deposition of Ann Louise Gibbs-Hunter
    a. Pgs. 6, 13-16, 31
14. Deposition of Raymond D. Gibbs, Jr.
    a. Pgs. 14-15, 40-42, 47, 58, 78

15. Deposition of Max Otarola-Nietzen
    a. Pg. 33
16. Affidavit of Harold Jenkins
    a. Pg. 2
17. Appellant's Initial Appellate Brief
    a. Pg. 5

I certify that this Designation of Matter contains no matter irrelevant to the Appeal.

Respectfully Submitted this 8th day of October, 2026,

MCCONOUGHEY LAW FIRM, LLC

Rachel G. McConoughey, Esq.
S.C. Bar No. 100449
100 Whitsett Street
Greenville, SC 29601
P (843) 425-3006
Contact@McConougheyLawFirm.com
Attorney for Respondent TNB Financial Services, as Trustee of Gene Mark Brown's Trust B-2 under The Doris P. Brown Revocable Trust Agreement Dated February 9, 2006, as Amended