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

Respectfully submitted,

s/ Adam C. Bach
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Attorneys for Respondents

October 7, 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 Amended Initial Brief of Respondents ("Amended 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 Amended Initial Brief in this matter. Respondents expressly reserve the right to seek supplementation of the record pursuant to Rule 209 and 212, SCACR.

Respondents designate 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. January 24, 2024, Defendants' Motion to Compel
    a. Ex. A: November 17, 2023, Defendants' First Set of Interrogatories to Plaintiff, Defendants' First Requests for Production to Plaintiff, and Defendants' First Requests for Admission to Plaintiff
4. March 4, 2024, Motion to Compel
    a. Ex. A: September 26, 2023, Plaintiff's First Set of Interrogatories to Defendants and Plaintiff's First Set of Requests for Production to Defendants
5. March 6, 2024, Motion to Continue Trial
6. March 21, 2025, Memorandum in Support of Defendant Innovative Scientific Solution's Motion for Protective Order

a. Ex. F: February 5, 2025, Plaintiff's Second Set of Interrogatories to Defendants and Plaintiff's Second Set of Requests for Production to Defendants

7. April 24, 2025, Subpoena to Greer Walker
8. April 24, 2025, Letter from Plaintiff's Counsel, Devon M. Puriefoy to Greer Walker
9. July 7, 2025, Docket Notice setting case for trial for week of August 11, 2025
10. 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
11. July 16, 2025, Motion for Summary Judgment of Defendants Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder
    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: 30(b)(6) Deposition Excerpt J. Ryan Flanagan
    e. Ex. E: October 1, 2022, Promissory Note (submitted to the trial court under seal)
12. July 17, 2025, Plaintiff's Motion for Continuance

13. July 22, 2025, Memorandum in Opposition to Plaintiff's Motion to Continue
    a. Ex. A: July 15, 2025, email chain
14. August 7, 2025, Consent Order to Refer Case to Master in Equity
15. September 15, 2025, Memorandum in Support of Defendants' Motion for Summary Judgment
    a. Ex. A: 30(b)(6) Deposition Excerpt J. Ryan Flanagan
    b. Ex. B: Deposition Excerpt Timothy James Jones
16. September 15, 2025, Memorandum of Law in Opposition of Defendant's Motion for Summary Judgment
17. September 17, 2025, Hearing Transcript
18. December 12, 2025, Supplemental Memorandum in Support of Defendants' Motion for Summary Judgment
    a. Ex. A: October 17, 2025, Deposition of Mark Swanson
    b. Ex. B: August 5, 2022, Mark Swanson Engagement/Retainer Letter
19. January 21, 2026, Order Granting Defendants' Motion for Summary Judgment
20. February 4, 2026, Form 4 Order
21. March 4, 2026, Notice of Appeal (and all Exhibits thereto)
22. Amended and Restated Operating Agreement (submitted to the trial court under seal)
23. October 7, 2024, Hearing Transcript
24. June 13, 2024, Motion to Compel
    a. Ex. A: September 26, 2023, Plaintiff's First Set of Interrogatories to Defendants and Plaintiff's First Set of Requests for Production to Defendants
    b. Ex. B: February 15, 2024, Letter from Devon Puriefoy to Adam Bach

25. February 12, 2025, Motion for Protective Order
    a. Ex. A: October 14, 2024, Order (Judge Kinlaw)
    b. Ex. B: January 27, 2025, Amended Notice of 30(b)(6) Topics Innovative Scientific Solutions
    c. Ex. C: January 28, 2025, Letter from Adam Bach, Attorney for Respondents, to Devon Puriefoy, Attorney for Appellant
26. April 16, 2025, Order/Protective Order
27. September 15, 2025, Sworn Affidavit of Timothy Jones
28. October 14, 2024, Order
29. November 6, 2024, Order Denying Plaintiff's Rule 59 Motion
30. May 23, 2025, Form 4 Order
31. October 7, 2024, Response to Plaintiff's Motion to Compel
    a. Ex. A: Deposition Excerpt Timothy James Jones
32. March 14, 2025, Letter from Sarah Compton, Attorney for Respondents, to Greenville County Clerk of Court (adding Exhibit D to February 12, 2025 Motion for Protective Order)
    a. Ex. D: 30(b)(6) Deposition Excerpt J. Ryan Flanagan
33. July 16, 2025, Motion to Seal Certain Exhibits to Summary Judgment Motion of Defendants Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder
    a. Ex. A: Index of Documents to Seal

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.

Respectfully submitted,

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