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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE GREENVILLE COUNTY
COURT OF COMMON PLEAS

The Honorable Vernon F. Dunbar

Case No. 2021-CP-23-04836

Thomas J. Stultz, Lecia S. Franklin, and Frederick Hanold, III, Respondents,

v.

Rallis Holdings, LLC, Appellant.

APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant Rallis Holdings, LLC designates the following to be included in the Record on Appeal:

1. Transcript of Motions Hearing, June 27, 2025
2. Transcript of Motions Hearing, August 28, 2025
3. Complaint, October 11, 2021
4. Answer, December 27, 2021
5. Amended Answer, October 18, 2022
6. Order Relieving and Substituting Counsel, November 17, 2022
7. Form 4 Order on Motion to Compel, November 30, 2023
8. Consent Order, May 22, 2024
9. Form 4 Order Granting Plaintiffs' Motion to Compel, November 20, 2024

10. Formal Order Granting Plaintiffs' Motion to Compel, December 4, 2024

11. Form 4 Order of Default as to Defendant, July 1, 2025

12. Order Granting Plaintiffs' Third Motion to Compel and Striking Defendant's Amended Answer, July 21, 2025

13. Form 4 Order Denying Defendant's Motion to Reconsider, April 10, 2026

14. Notice of Appeal, April 22, 2026

15. Motion to be Relieved and Substitute Counsel, November 9, 2022

16. Plaintiffs' Motion to Compel Discovery, November 9, 2023

17. Plaintiffs' Motion for Default Judgment / Third Motion to Compel Discovery from Defendant, May 27, 2025

18. Plaintiffs' Memorandum in Support of Motion for Default Judgment / Third Motion to Compel Discovery from Defendant with exhibits, June 26, 2025

19. Defendant's Supplemental Responses to Plaintiffs' Discovery Requests, December 4, 2024

20. Defendant's Motion to Reconsider (including all exhibits), July 31, 2025:

    - Ex. A – Plaintiffs' First Set of Discovery Requests, served July 13, 2022
    - Ex. B – Plaintiffs' Revised First Set of Discovery Requests, September 26, 2022
    - Ex. C – Defendant's Responses to Plaintiffs' First Set of Discovery Requests, October 13, 2022
    - Ex. D – Deficiency Letter, March 13, 2023
    - Ex. E – Email between counsel, May 30, 2023
    - Ex. F – Deficiency Letter, October 23, 2023
    - Ex. G – Deficiency Letter, April 11, 2024
    - Ex. H – Emails between counsel, April 11, 2024
    - Ex. I – Emails between counsel, April 12, 2024
    - Ex. J – Deficiency Letter, May 21, 2024

- Ex. K – Defendant's Supplemental Responses to Plaintiffs' Discovery Requests, May 23, 2024
- Ex. L – Emails between counsel, June 2024
- Ex. M – Defendant's Supplemental Responses to Discovery July 22, 2024
- Ex. N – Defendant's Supplemental Responses to Discovery, December 4, 2024
- Ex. O – Defendant's Supplemental Responses to Discovery, December 13, 2024
- Ex. P – Defendant's Supplemental Responses to Discovery – December 19, 2024
- Ex. Q – Email transmitting production, June 25, 2025

21. Plaintiffs' Memorandum in Opposition to Defendant's Motion to Alter or Amend Order, August 27, 2025

22. Correspondence and Defendant's Supplemental Discovery Responses, August 28, 2025

23. Correspondence to the Court Attaching Supplemental Discovery Responses, April 3, 2026

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

Respectfully submitted,

s/ Andrew R. Hand
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October 21, 2026
Columbia, South Carolina.