

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Marvin H. Dukes, III, Presiding Judge

---

Case No. 2013-CP-1186

---

Charles R. Mikals and Donna Mikals.....Appellants

v.

Debra House.....Respondent

---

**DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

---

Respondent proposes the following be included in the Record on Appeal:

1. Order of October 7, 2013;
2. Order of January 23, 2014;
3. Complaint;
4. Motion to Dismiss for Lack of Personal Jurisdiction;
5. Affidavit of Debra House – July 10, 2013;
6. Affidavit of Donna Mikals – July 18, 2013;
7. Plaintiffs’ Memorandum in Opposition to Defendant’s Motion to Dismiss of July 19, 2013;

8. Supplemental Affidavit of Donna Mikals – July 30, 2013;
9. Defendant's Motion for Continuance;
10. Plaintiffs' Notice of Hearing on Defendant's Motion to Dismiss – July 19, 2013;
11. Notice of Appearance – August 12, 2013;
12. Defendant's Notice of Hearing on Defendant's Motion to Dismiss – August 12, 2013;
13. Defendant's Memorandum in Support of Motion to Dismiss for Lack of Personal Jurisdiction – September 3, 2013;
14. Transcript of Hearing on Defendant's Motion to Dismiss – September 3, 2013;
15. Defendant's Supplemental/Reply Affidavit of Debra House – August 29, 2013;
16. Affidavit of Mark Hinchcliffe – August 29, 2013;
17. Affidavit of Randy Mikals – September 6, 2013;
18. Plaintiffs' Supplemental Memorandum in Opposition to Defendant's Motion to Dismiss – September 6, 2013;
19. Defendant's Supplemental Memorandum in Support of Motion to Dismiss for Lack of Personal Jurisdiction – September 12, 2013;
20. Plaintiffs' Motion to Alter or Amend Judgment and Memorandum in Support Thereof;
21. Transcript of Hearing on Plaintiffs' Motion to Alter or Amend – January 22, 2014; and
22. Letter from South Carolina Court of Appeals Deputy Clerk Claire Allen to Plaintiffs' Counsel regarding failure to timely file Appellants' Initial Brief and Designation of Matter – March 19, 2014.

*{signature page follows}*

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

April 15, 2014



---

J. Scott Falls

Bar No. 75799

Scott@jscottfallsllaw.com

53 Broad Street, Suite 205

Post Office Box 657 (29402)

Charleston, South Carolina 29401

(843) 737-6040 (telephone)

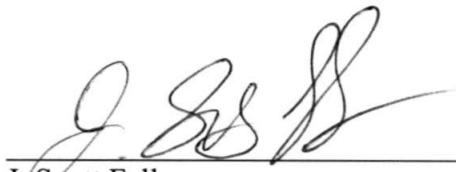
(843) 737-6140 (facsimile)

Attorney for Respondent

**PROOF OF SERVICE**

I, the attorney for Respondent in the appeal of *Charles R. Mikals and Donna Mikals v. Debra House*, Docket No. 2013-CP-1186, do hereby certify that on April 16, 2014, I personally served the foregoing **Initial Brief of Respondent** by mailing a copy of the same, with postage prepaid, by United States mail to counsel for the Appellants at the address indicated below:

John E. North, Jr.  
North & Black, P.C.  
916 Bay Street, Suite 100  
Beaufort, South Carolina 29902



---

J. Scott Falls  
Bar No. 75799  
Scott@jscottfallslaw.com  
53 Broad Street, Suite 205  
Post Office Box 657 (29402)  
Charleston, South Carolina 29401  
(843) 737-6040 (telephone)  
(843) 737-6140 (facsimile)  
Attorney for Respondent

**RECEIVED**

APR 21 2014

**SC Court of Appeals**

 **L A W O F F I C E S O F**  
**J. SCOTT FALLS LLC**

53 Broad Street, Suite 205  
Charleston, South Carolina 29401

J. Scott Falls, Esq.

Post Office Box 657  
Charleston, SC 29402-657

Scott@jscottfallslaw.com  
www.jscottfallslaw.com

Main (843) 737-6040  
Fax (843) 737-6140

April 15, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

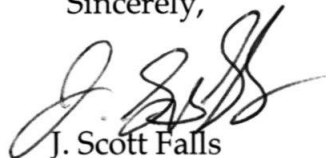
**Re: Charles Mikals & Donna Mikals vs. Debra House  
Appellate Case No. 2014-000325**

Dear Ms. Kitchings:

In regards to the above referenced appeal, please find enclosed herein an original and one original and one copy of Respondent's Initial Brief, Respondent's Designation of Matter for the Record, and Respondent's Proof of Service of the same.

I would be most grateful if you could please return a file stamped copy to me in the enclosed self addressed stamped envelope. By copy of this letter, I have served a copy of the enclosures upon all attorneys of record.

Sincerely,

  
J. Scott Falls

Enclosures (as stated)

cc: John North, Esq.

**RECEIVED**

APR 21 2014

**SC Court of Appeals**