

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

Appeal from the Court of Common Pleas
For Georgetown County
Honorable Benjamin H. Culbertson, Circuit Judge
Civil Action No.: 2012-CP-22-00889
Appellate Case No : 2014-001104

Alexander Mangialardo and Audra Mangialardo Appellants,

v

Blue Ridge Ventures, LLC, Gerald W Kelly, Elizabeth L Kelly,
South Carolina Bank & Trust, NA, Century 21 – The Beach Company, LLC,
Cason Engineering Company, Inc , Keith Duncan,
Attorneys Title Insurance Fund, Inc., G. Turner Perrow, Jr and
Tidelands Law, LLC Defendants,

Of Whom Blue Ridge Ventures, LLC, Gerald W Kelly, Elizabeth L Kelly,
Cason Engineering Company, Inc , Keith Duncan, Attorneys Title Insurance
Fund, Inc., G. Turner Perrow, Jr. and Tidelands Law, LLC
are the Respondents.

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

Respondents Gerald W. Kelly and Elizabeth L. Kelly propose the following to
be included in the Record on Appeal:

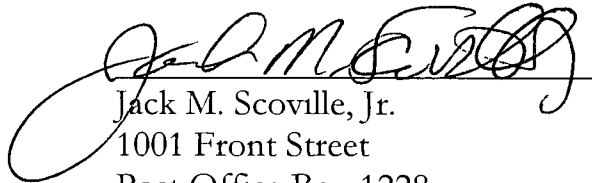
1. Subdivision Plat
2. Buy Sell Agreement dated September 30, 2007

3 Deed dated October 23, 2007

4. Deed of foreclosure, Case Number 2010-CP-22-1601.

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

Respectfully Submitted,



Jack M. Scoville, Jr.

1001 Front Street

Post Office Box 1228

Georgetown, South Carolina

SC Bar I.D. No. 4999

Telephone 843 546.1130

Telecopier 843.546 0726

Attorney for Gerald W. Kelly and

Elizabeth L. Kelly

January 6, 2015

Georgetown, South Carolina

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APPEAL FROM GEORGETOWN COUNTY
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(Appellate Case No. 2014-001104)

Alexander Mangialardo and Audra Mangialardo Appellants,

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Attorneys Title Insurance Fund, Inc , G Turner Perrow, Jr. and
Tidelands Law, LLC Defendants,

Of Whom Blue Ridge Ventures, LLC, Gerald W Kelly, Elizabeth L. Kelly,
Cason Engineering Company, Inc , Keith Duncan,
Attorneys Title Insurance Fund, Inc , G Turner Perrow, Jr. and Tidelands Law, LLC
are the Respondents

PROOF OF SERVICE

I certify that I have served the Designation of Matter of Gerald W and Elizabeth L. Kelly on the following, by mailing a copy thereof, by depositing same in the United States mail on the 6th day of January, 2015, first class postage prepaid, and addressed as follows:

- | | | |
|-----------------------------|------------------|------------------------|
| Jeffrey E Johnson, Esquire | P O Drawer 1829 | Conway, SC 29528 |
| Karen A Sauls, Esquire | P O Drawer 2598 | Myrtle Beach, SC 29578 |
| Michael S Chambers, Esquire | 121 Manly Street | Greenville, SC 29601 |
| G Turner Perrow, Esquire | 606 Front Street | Georgetown, SC 29440 |

Jack M. Scoville, Jr.
Attorney at Law
A Professional Association
1001 Front Street
Post Office Drawer 1228
Georgetown, South Carolina 29442

TELEPHONE (843) 546-1130
FAX # (843) 546-0726

January 6, 2015

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1205 Pendleton Street
Columbia, SC 29201

RE Alexander Mangialardo and Audra Mangialardo vs Blue Ridge Ventures, LLC, et al.
Appellate Case No 2014-001104

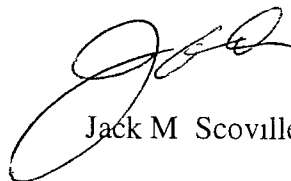
Dear Ms Kitchings

Please find enclosed the original and one copy of Designation of Matter, along with Proof of Service, to be included on the Record of Appeal filed on behalf of the Respondents Gerald W Kelly and Elizabeth L. Kelly I apologize for not including this with my Initial Brief I assumed all of these documents were included in the Designation of Matter proposed by the Appellants and, therefore, overlooked the necessity of filing a separate proposal I apologize for any inconvenience this may have caused anyone in this matter

I would appreciate your filing the original documents in your office and returning to me clocked copies for my file A self-addressed stamped envelope is enclosed for your use By copy of this correspondence, I am hereby serving all counsel of record with same

Thank you in advance for your assistance in this request.

Very truly yours,



Jack M Scoville, Jr.

JMSjr/mmw

Enclosures

cc Michael S Chambers, Esq
G. Turner Perrow, Esq.
Karen Sauls, Esq.
Jeffrey E Johnson, Esq.
Caison Engineering Company, Inc , c/o Albert A Caison
Blue Ridge Ventures, LLC, c/o Keith Duncan
Keith Duncan
Gerald and Elizabeth Kelly

JACK M. SCOVILLE, JR.
ATTORNEY AT LAW
A PROFESSIONAL ASSOCIATION
1001 FRONT STREET
POST OFFICE DRAWER 1228
GEORGETOWN, SOUTH CAROLINA 29442



The Honorable Jenny Abbott Kitchings
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