

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
FEB 05 2015  
**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi Harrington, Circuit Court Judge

Case No. 2011-CP-10-1559

WILDFLOWER NURSERY, INC d/b/a PLEASANT  
LANDSCAPES . . . . .

Appellant

v.

JOSEPH W BEASLEY a/k/a BILLY BEASLEY . . . . .

Respondent

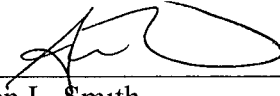
**DESIGNATION OF MATTER FOR INCLUSION  
INTO RECORD ON APPEAL**

Respondent Joseph W Beasley a/k/a Billy Beasley proposes the following be included in the Record on Appeal:

- 1 Complaint in Magistrate’s Court
- 2. Answer and Counterclaim in Magistrate’s Court
- 3. Letter of Joseph Beasley requesting continuance
- 4 Removal letter
- 5 Order of Transfer to Circuit Court
- 6 Motion to Strike Complaint, including Certificate of Service
- 7 Transcript of Trial of May 9, 2013
- 8 Form 4 Order, May 10, 2013
- 9 Motion to Appoint Receiver
- 10. *Pro Se* Motion to Vacate
- 11 Notice of Appearance of Christopher Inglese
- 12 Form 4 Order, November 26, 2013
- 13. Order, July 3, 2014
- 14 Motion for Supplemental Proceedings
- 15. Amended Motion to Vacate
- 16. Order, July 21, 2014
- 17 Charleston County Clerk’s Office, Public Index, Case Parties, *Wildflower Nursery Inc v Beasley*

18. Charleston County Clerk's Office, Public Index, Actions, *Wildflower Nursery Inc v Beasley*
19. Email from Office of Respondent's Counsel to the Honorable Kristi Harrington, May 10, 2013

The undersigned hereby certifies that this designation contains no material which is irrelevant to this Appeal.



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Zachary J. Closser  
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843-552-2678 (fax)  
Attorneys for the Defendant

2-3, 2015  
Charleston, SC

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Case No. 2011-CP-10-1559

Wildflower Nursery, Inc., d/b/a Pleasant Landscapes.....Appellant

v.

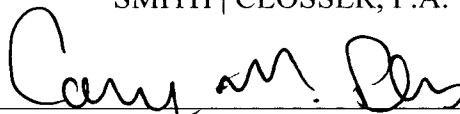
Joseph W Beasley, Jr., a/k/a Bill Beasley. ....Respondent

**PROOF OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of Respondents' Designation of Matter for Inclusion into Record on Appeal and Initial Brief of the Respondent to the following:

Tanya A. Gee  
NEXSEN PRUET, LLC  
P.O. Drawer 2426  
Columbia, SC 29202  
Attorney for the Appellant

SMITH | CLOSSER, P.A.

  
Corey M. Plis

2-3, 2015  
Charleston, South Carolina  
11-064

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SC Court of Appeals

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February 3, 2015

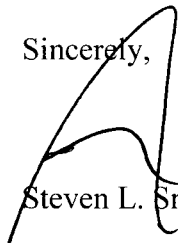
Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

*Re Wildflower Nursery, Inc , d/b/a Pleasant Landscapes vs Joseph W Beasley  
Case No 2011-CP-10-1559  
S\C File No 11-064*

Dear Ms. Kitchings,

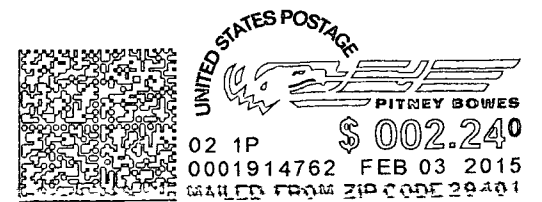
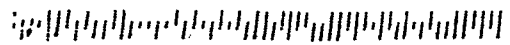
Enclosed please find the Respondent *Joseph W Beasley's*, Designation of Matter for Inclusion into Record on Appeal and Initial Brief of the Respondent and the accompanying Certificate of Service showing that the same has been served upon Tanya A. Gee, Attorney for the Appellant. Please feel free to contact me should you have any questions.

Sincerely,



Steven L. Smith

cc Tanya A Gee



**Smith | Closser, P.A.**

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