

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, Master in Equity

Appellate Case No. 2014-002290

JMT Capitol Holdings, LLC, Plaintiff,

v.

VDM/T Land Company, LLC and
Daufuskie Island Properties, LLC, Defendants.

And

Daufuskie Island Properties, LLC,
and its successor in interest, Ace
Basin Investments, LLC, Appellant,

v.

Raymond Travaglione, Respondent.

**RESPONDENT'S DESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

In addition to the matters designated by Appellant in its Designation of the Record on Appeal, Respondent proposes the following additional items be included in the Record on Appeal:


1. Respondent's Memorandum of Law in Support of Third-Party Defendant Raymond Travaglione's Notice and Motion to Dismiss Third-Party Complaint with exhibits dated August 6, 2014;

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SC Court of Appeals

2. Respondent's correspondence to Judge Dukes, dated September 5, 2014 (including email transmittal);
3. Email dated September 5, 2014 at 5:10 p.m. from Ms. Nauful to Judge Dukes.

Pursuant to Rule 209(c), SCACR, we certify that this designation of additional items contains no matter which is irrelevant to this appeal.

ADAMS AND REESE LLP

By: Tara E. Nauful 

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Attorneys for Respondent
Raymond Travaglione

March 18, 2015

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Plaintiff, **SC Court of Appeals**

v.

VDM/T Land Company, LLC and
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And

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and its successor in interest, Ace
Basin Investments, LLC,

Appellant,

v.

Raymond Travaglione,

Respondent.

PROOF OF SERVICE

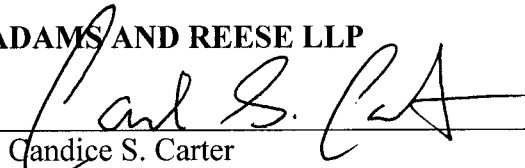
I, the undersigned, do hereby certify that on March 18, 2015, I caused the below named parties to be served with a copy of the following document(s):

1. Initial Brief of Respondent; and
2. Respondent's Designation of Additional Items to be Included in the Record on Appeal.

by causing said document(s) to be placed in a sealed envelope with postage thereon fully prepaid, in the United States mail, with return address clearly shown, as set forth below.

<p>Lindsey W. Cooper, Jr., Esq. The Law Offices of L.W. Cooper Jr., LLC 36 Broad Street Charleston, SC 29401</p> <p><i>Counsel to Daufuskie Island Properties, LLC, and its successor in interest Ace Basin Investments, LLC</i></p>	<p>Jannine M. Mutterer, Esq. West Olivetti, LLC P.O. Box 7906 Hilton Head Island, SC 29938</p> <p><i>Attorneys for VDM/T Land Company</i></p>
<p>Suzanne Taylor Graham Grigg, Esq. Jeffrey D. Locker, Esq. Nexsen Pruettt, LLC P.O. Drawer 2426 Columbia, SC 29202</p> <p><i>Attorneys for JMT Capital Holdings, LLC</i></p>	

ADAMS AND REESE LLP



Candice S. Carter
Paralegal to Tara E. Nauful
Post Office Box 2285
Columbia, South Carolina 29202-2285

March 18, 2015

March 18, 2015

Via Hand-Delivery

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

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SC Court of Appeals

Tara E. Naful

Certified Bankruptcy Specialist by
the South Carolina Supreme Court

Direct: 803.212.4408

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Re: *JMT Capitol Holdings, LLC v. VDM/T Land Company, LLC and Daufuskie Island Properties, LLC; Daufuskie Island Properties, LLC and its successor in interest, Ace Basin Investments, LLC v. Raymond Travaglione*
Appellate Case No. 2014-002290
Adams and Reese File No.: 023270-000004

Dear Ms. Kitchings:

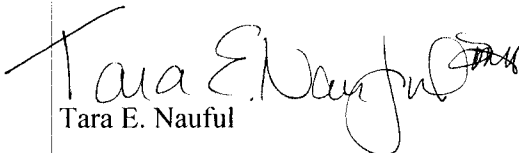
Please find enclosed for filing the original and one (1) copy of the following items relative to the above-referenced matter:

1. Initial Brief of Respondent;
2. Respondent's Designation of Additional Items to be Included in the Record on Appeal; and
3. Proof of Service.

Please have someone from your office file the originals and return a filed copy to me with my courier. If you have any questions, please feel free to contact me.

Thank you for your assistance in this matter.

Sincerely yours,


Tara E. Naful

Enclosures (as stated)

c (w/ enclosures): Lindsey W. Cooper, Jr., Esq. (via U.S. Mail)
Suzanne Taylor Graham Grigg, Esq. (via U.S. Mail)
Jeffrey D. Locker, Esq. (via U.S. Mail)
Jannine M. Mutterer, Esq. (via U.S. Mail)
Mr. Raymond Travaglione (via E-Mail)