

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Appellate Case No. 2015-000589

RECEIVED

SEP 15 2015  
SC Court of Appeals

Jack R. Harrell, Jr. and Tina W. Harrell ..... Appellants,

v.

Keowee Falls Investment Group, LLC, The Cliffs Communities,  
LLC and S&ME, Inc. , Defendants

*Of whom* Keowee Falls Investment Group is the.....Respondent.

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

Appellant requests that the following items be included in the Record on Appeal:

1. Complaint
2. Answer of KFIG
3. Trial transcript pages 136-137, 139, 140-141, 148, 149, 142-143, 150-152, 159, 160-162,  
186-187, 301, 350, 594-595, 655, 858-859, 875, 901, 943, 869-902.
4. Plaintiffs' Motion for a New Trial
5. Plaintiffs' Trial Ex. 1 – Harrell Contract
6. Plaintiffs' Trial Ex. 2 – HUD Report
7. Plaintiffs' Trial Ex. 4 – 2005 S&ME Report
8. Plaintiffs' Trial Ex. 5 – 2008 S&ME Report

9. Plaintiffs' Trial Ex. 7 – Plaintiffs' demand letter
10. Plaintiffs' Trial Ex. 15, BLE report of March 1, 2010
11. Plaintiffs' Trial Ex. 29, February 12, 2010 S&ME report
12. Plaintiffs' Trial Ex. 12, Alpha Environmental Report
13. Plaintiffs' Trial Ex. 25, S&ME recommendations to Resort Custom Homes
14. Plaintiffs' Trial Ex. 10 – letter from Alpha Environmental
15. Plaintiffs' Trial Exhibits 19 and 20, BLE slope inclinometer reports
16. Plaintiffs Trial Ex. 36, report of Carroll Crowther
17. February 10, 2015 Order of the Honorable Clifton Newman

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

Respectfully submitted.

V. ELIZABETH WRIGHT LAW FIRM, LLC



V. Elizabeth Wright (S.C. Bar #76029)  
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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2011-CP-23-5300

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SEP 15 2015  
SC Court of Appeals

Jack R. Harrell, Jr. and Tina W. Harrell .....Appellant,

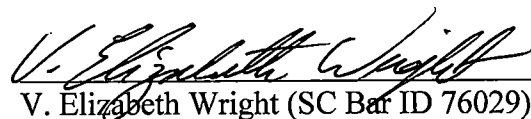
v.

Keowee Falls Investment Group, LLC, The Cliffs  
Communities, LLC and S&ME, Inc., Defendants,

*Of whom* Keowee Falls Investment Group is the.....Respondent.

**PROOF OF SERVICE**

I certify that I have served the **Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal** on counsel for the Respondent and for The Cliffs Communities, LLC Elizabeth M. McMillan, at her address of P.O. Box 2980, Greenville, SC 29602, by depositing it into the U.S. Mail, first class postage prepaid on September 14, 2015.



V. Elizabeth Wright (SC Bar ID 76029)  
V. ELIZABETH WRIGHT LAW FIRM, LLC  
217 E. Park Avenue  
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(864) 326-5281

*Attorneys for the Appellants*

Greenville, South Carolina  
September 14, 2015

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September 14, 2015

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SEP 15 2015

SC Court of Appeals

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

RE: Jack R. Harrell, Jr. and Tina W. Harrell, Appellants v. Keowee Falls Investment Group, LLC, The Cliffs Communities, LLC and S&ME, Inc. *of whom* Keowee Falls Investment Group is the Respondent.  
Appellate Case No. 2015-000589

Dear Ms. Kitchings:

Please find enclosed for filing the following:

1. Appellants' Initial Brief
2. Designation of Matter to be Included in the Record on Appeal;
3. Proof of Service; and
4. A self-addressed, stamped envelope.

Please return the clocked-in copy to me by way of the self-addressed, stamped envelope. By copy of this correspondence I have served counsel for the Respondent.

Very truly yours,

V. ELIZABETH WRIGHT LAW FIRM, LLC



V. Elizabeth Wright

VEW  
Enclosure(s)

cc: Elizabeth M. McMillan, Esq.

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SFP 15 2015

SC Court of Appeals

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V ELIZABETH WRIGHT 217 E. PARK AVENUE GREENVILLE SC 29601		<b>0007</b> (864) 326-5281
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