

RECEIVED  
JAN 04 2016  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

Case No. 10-CP-10-6239 (Appeal No.: 2015-000940)

D.A. Morgan Price, ..... Respondent,

v.

Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds  
Horizontal Property Regime, and The Marshland Communities, LLC, Defendants,

Of Whom Todd Chas and Jacara Chas are the ..... Appellants.

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

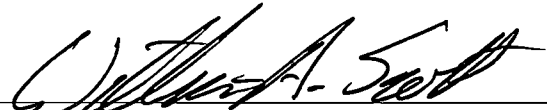
1. Order denying Chas' Motion to Set Aside dated February 17, 2015
2. Order denying Chas' Motion for Reconsideration dated March 26, 2015
3. Complaint dated August 2, 2010
4. Verdict dated February 21, 2013 and accompanying 4 order
5. Title to Real Estate dated December 2, 2004
6. Email from Karen Colle re Marsh Winds dated January 24, 2006
7. Email from Mario Del Signore regarding Marsh Winds Inspection dated February 5, 2006
8. Email from Karen Colle re Marsh Winds Inspection dated March 1, 2006

9. Letter from Gary Freeman regarding proposal for forensic services for Marsh Winds Condominium dated June 19, 2006
10. Email from Karen Colle regarding another leak dated October 30, 2006
11. Email from Lynn Mappus regarding roofing update dated July 9, 2007
12. Listing Agreement between Chases and Keller Williams dated September 13, 2007
13. SC Residential Property Condition Disclosure Statement dated November 14, 2007 (Price Exhibit 2)
14. SC Residential Property Condition Statement dated November 14, 2007 (Price Exhibit 3)
15. Email from Karen Colle regarding elevator/roof December 20-21 dated December 21, 2007
16. Email from Susan Davis regarding Butch dated January 3, 2008
17. Settlement Statement dated January 3, 2008
18. Affidavit of Non-Service on Jacaranda C. Chas dated September 8, 2010
19. Affidavit of Publication – The Post and Courier dated October 22, 2010
20. Affidavit of Andrew Radeker regarding non-service after diligent search dated November 18, 2010
21. Order for Service of Publication dated November 22, 2010
22. Defendant Marsh Winds owners Association, Inc. a/k/a Marsh Winds Horizontal Property Regime Answers to Plaintiff's Interrogatories dated March 28, 2012
23. Selected pages from deposition of Karen M. Colle dated May 31, 2012
24. Selected pages from deposition of Thomas P. Chorlton dated July 24, 2012
25. Obituary of Kevin W. Fain dated January 30, 2013

26. Notice of Trial/Hearing on Damages as to Defendants Todd Chas and Jacara Chas dated February 13, 2013
27. Obituary of Thomas Chorlton dated January 10, 2014
28. Affidavit of Todd Chas dated August 29, 2014
29. Affidavit of Jacara Chas dated August 29, 2014
30. Charleston County Search of Real Property, Personal Property and Motor Vehicle by Owner name dated December 10, 2014
31. Charleston County Summary report regarding 4 Middleton Place, Charleston, SC dated December 10, 2014
32. DM-Name MIK Search Results regarding Todd Chas dated December 20, 2014
33. DM-Name MIK Search Results regarding Jacara Chas dated December 10, 2014
34. Affidavit of Charles V. "Skip" Lupton dated December 12, 2014
35. Affidavit of Andrew S. Radeker dated December 12, 2014
36. Affidavit of Morgan Price in Opposition to Chas Defendants' Motion to Set Aside Judgment Dated December 12, 2014
37. Transcript of Hearing on Motion to Set Aside Judgment dated December 16, 2014
38. Defendants' Notice of Motion, Motion to Set Aside Judgment, and Supporting Memorandum
39. Plaintiff's Memorandum in Opposition to Chas Defendants' Motion to Set Aside Judgment
40. Defendants' Notice of Motion, Motion for Reconsideration

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

PEDERSEN & SCOTT, P.C.



---

William A. Scott  
775 St. Andrews Blvd.  
Charleston, SC 29407  
Tel: (843) 556-5656  
Fax: (843) 556-5635  
E-Mail: [bscott@pslawpc.com](mailto:bscott@pslawpc.com)

Dated: December 31, 2015

*Attorney for Appellants*

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No. 10-CP-10-6239 (Appeal No.: 2015-000940)

---

RECEIVED  
JAN 04 2016  
SC Court of Appeals

D.A. Morgan Price,.....Respondent,

v.

Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc.  
a/k/a Marsh Winds Horizontal Property Regime, and  
The Marshland Communities, LLC, Defendants

Of whom Todd Chas and Jacara Chas are the.....Appellants.

---

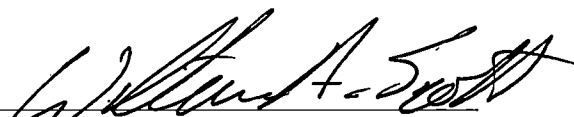
**PROOF OF SERVICE**

---

I certify that I served the Appellant's Reply Brief, Amended Designation of Matter to be Included in the Record of Appeal, Certificate of Counsel and Proof of Service by depositing a copy of it in the United States Mail, postage prepaid, on December 31, 2015, addressed to counsel for Respondent, Andrew S. Radeker, Esq., Harrison & Radeker, P.A., Post Office Box 50143, Columbia, SC 29250.

[SIGNATURE ON NEXT PAGE]

PEDERSEN & SCOTT, P.C.



William A. Scott  
775 St. Andrews Blvd.  
Charleston, SC 29407  
Tel: (843) 556-5656  
Fax: (843) 556-5635  
E-Mail: [bscott@pslawpc.com](mailto:bscott@pslawpc.com)

*Attorney for Appellants*

Dated: December 31, 2015  
Charleston, South Carolina

**PEDERSEN & SCOTT, P.C.**

ATTORNEYS AT LAW

P 843-556-5656  
F 843-556-5635  
bscott@pslawpc.com

December 31, 2015

**RECEIVED**

JAN 04 2016

**SC Court of Appeals**

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

**RE: D.A. Morgan Price v. Todd Chas  
Appellate Case No. 2015-000940**

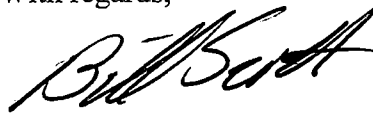
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the Appellants' Reply Brief, Amended Designation of Matter to be Included in the Record on Appeal, Certificate of Counsel and Proof of Service. Please return a stamped-in copy of these documents in the enclosed envelope.

By copy of this letter, the Appellants' Reply Brief, Amended Designation of Matter to be Included in the Record on Appeal, Certificate of Counsel and Proof of Service are being served upon Respondent's counsel.

Please contact me if you have any questions.

With regards,



William A. Scott

WAS/teb  
Enclosures  
cc: Andrew S. Radeker, Esq. (w/encs.)

William A. Scott, Esq.  
Pedersen & Scott, P.C.  
775 St. Andrews Boulevard  
Charleston, SC 29407



**RECEIVED**  
JAN 04 2016  
SC Court of Appeals

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

