

**THE STATE OF SOUTH CAROLINA**  
**In the Court of Appeals**

---

**RECEIVED**

DEC 15 2015

SC Court of Appeals

**Appeal from Charleston County**  
**Court of Common Pleas**

**R. Markley Dennis, Jr., Circuit Court Judge**

---

**CASE NO. 2013-CP-10-1686**

---

Church of God and Church of God of South Carolina, .....Appellants,

v.

Mark Estes, Patricia Estes, Michael Timothy Brooks, Individually and as Trustee for Church of God at North Charleston Trust, Adam Boyer, Individually and as Trustee for Church of God at North Charleston, Rolando River Osorio As Trustee For Church Of God At North Charleston Trust and North Palm Ministries, Inc., North Palm Community Church and Crescom Bank, Successor by Merger to Community First Bank and its Successor Crescom Bank, Defendants.

Of Whom Crescom Bank is the .....Respondent,

v.

Thomas Propes and Marc Campbell, Third Party  
Defendants.

---

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

---

Appellants propose the following be included in the Record on Appeal:

1. Order of May 11, 2015;
2. Order of July 29, 2015;
3. March 20, 2013 Complaint with attachments/exhibits;
4. November 12, 2013 Second Amended Complaint;

5. Respondent Crescom's Motion for Summary Judgment, Exhibits 3, 4, 6 & 13;
6. Respondent Crescom's Memorandum in Support of Motion for Summary Judgment pgs. 5 - 6;
7. Campbell Deposition Transcripts pgs. 31, 139 - 141, 178 - 181, and Exhibit 11;
8. Warrick Deposition pgs. 14 - 17, 23, 26 - 32, 35-36, 40 - 41, and Exhibits 2 & 5; and,
9. Plaintiff's Motion to Alter or Amend with exhibits.
10. April 2, 2015 Hearing Transcript

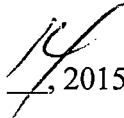
I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted:

  
\_\_\_\_\_  
George J. Kefalos  
GEORGE J. KEFALOS, PA  
46 A State Street  
Charleston, SC 29401  
(843) 722-6612  
[George@kefaloslaw.com](mailto:George@kefaloslaw.com)

Oana D. Johnson  
Attorney for Appellant  
Janik L. L. P.  
One Carriage Lane  
Building H  
Charleston, South Carolina 29407  
[Oana.johnson@janiklaw.com](mailto:Oana.johnson@janiklaw.com)

ATTORNEYS FOR APPELLANT  
CHURCHES OF GOD

December , 2015

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

DEC 15 2015

SC Court of Appeals

Appeal from Charleston County  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

CASE NO. 2013-CP-10-1686

Church of God and Church of God of South Carolina, .....Appellants,

v.

Mark Estes, Patricia Estes, Michael Timothy Brooks, Individually and as Trustee for Church of God at North Charleston Trust, Adam Boyer, Individually and as Trustee for Church of God at North Charleston, Rolando River Osorio As Trustee For Church Of God At North Charleston Trust and North Palm Ministries, Inc., North Palm Community Church and Crescom Bank, Successor by Merger to Community First Bank and its Successor Crescom Bank, Defendants.

Of Whom Crescom Bank is the .....Respondent,

v.

Thomas Propes and Marc Campbell, Third Party  
Defendants.

PROOF OF SERVICE

I certify that I have served copies of the forgoing **Appellant's Initial Brief and Designation of Matters to be Included in the Record** on Respondents' counsel of record by depositing true and correct copies in the United States Mail, postage prepaid, on December 14<sup>th</sup>, 2015, addressed to the following:

Matthew E. Tillman, Esquire  
Daniel Q. Orvin, Esquire  
Womble Carlyle Sandridge & Rice, LLP

P.O. Box 999  
Charleston, SC 29402-0999  
(843) 722-3400  
[dorvin@wcsr.com](mailto:dorvin@wcsr.com)  
[mtillman@wcsr.com](mailto:mtillman@wcsr.com)  
ATTORNEYS FOR RESPONDENT

Carol B. Ervin, Esquire  
Brian L. Quisenberry, Esquire  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
(843) 577-4000  
[cervin@ycrlaw.com](mailto:cervin@ycrlaw.com)  
[bquisenberry@ycrlaw.com](mailto:bquisenberry@ycrlaw.com)  
ATTORNEYS FOR CHURCH OF GOD OF  
SOUTH CAROLINA, THOMAS PROPEs and  
MARC CAMPBELL

C. Steven Moskos, Esquire  
4000 Farber Place Drive, Suite 300  
Charleston, SC 29405  
(843) 763-5297  
[csmoskos@earthlink.net](mailto:csmoskos@earthlink.net)

ATTORNEY FOR DEFENDANTS

Rolando Rivera Osorio  
8241 Preakness Drive, Lot 211  
North Charleston, SC 29420  
*Pro Se Defendant*

Respectfully submitted:



---

George J. Kefalos  
GEORGE J. KEFALOS, PA  
46 A State Street  
Charleston, SC 29401  
(843) 722-6612  
[George@kefaloslaw.com](mailto:George@kefaloslaw.com)

Oana D. Johnson  
Attorney for Appellant  
Janik L. L. P.  
One Carriage Lane  
Building H  
Charleston, South Carolina 29407  
[Oana.johnson@janiklaw.com](mailto:Oana.johnson@janiklaw.com)

ATTORNEYS FOR APPELLANT  
CHURCHES OF GOD

December 14, 2015