

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Perry M. Buckner Circuit Court Judge

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Appellate case No. 2015-001988

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Mark and Elizabeth Heil,

Appellants,

v.

Stewart and Christina Hines  
and Sam Imler d/b/a Sam's  
Tree Service

Defendants

Of whom Stewart and  
Christina Hines are the

Respondents.

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**RESPONDENTS' DESIGNATION OF MATTERS TO BE  
INCLUDED IN THE RECORD ON APPEAL**

1. Order Granting Defendants' Motion for Summary Judgment
2. Order denying Motion to Alter or Amend
3. Amended Complaint
4. Answer and Motion to Dismiss to Plaintiffs' Amended Complaint
5. Combined Transcript of Hearings of March 3, 2015 and June 16, 2015 hearings pp. 1- 10, 15-16 and 22- 26

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SC Court of Appeals

6. Defendant Stewart Hines and Christina Hines' Memorandum in Support of Motion for Summary Judgment (12 pages) and all Exhibits: (Deposition of E. Heil pages 1- 36, Deposition Imler pp.1, 5, 6, 11, 12, 19, 20, 22, ,24, 25, , 29, 30, 32, , 41; Deposition M Heil pp 1, 5 -9, 15 & Hines Prod 1 and 2)
7. Defendant Stewart Hines and Christina Hines' Memo in Opposition to the Plaintiff's Motion to Alter or Amend (pp 1-5)

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

December 31, 2015



Brian D. McDaniel  
Law Office Of Brian McDaniel, LLC  
Post Office Box 2085  
Beaufort, South Carolina 29901  
SC Bar # 68618  
(843) 379-5117  
Attorney for the Respondent

Other Counsel of Record:

Charles W. Thomson, Esq.  
Glynn L. Capell, Esq.  
The Capell Law Firm, LLC  
Post Office Box 6628  
Hilton Head Island, SC 29938

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Perry M. Buckner Circuit Court Judge

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Case No. 2013-CP-07-1231  
Appellate case No. 2015-001988

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SC Court of Appeals

Mark Heil and Elizabeth Heil,

Appellants,

v.

Stewart Hines and Christina  
Hines and Sam Imler d/b/a  
Sam's Tree Service

Defendants

Of whom Stewart Hines and  
Christina Hines are the

Respondents.

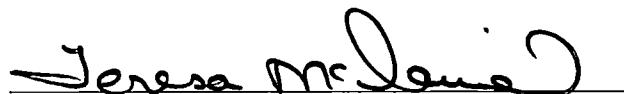
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PROOF OF SERVICE

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I, Teresa McDaniel, legal Assistant for Law Office of Brian McDaniel, certify that I have served the Initial Brief of the Respondents with the Designation of Matter upon the Appellants by depositing a copy of it in the United States mail, postage prepaid, on December 31, 2015, addressed to their attorneys of record, Charles W. Thomson, Esquire, Glynn L. Capell, Esquire of The Capell Law Firm, LLC, Post Office Box 6628, Hilton Head Island, SC 29938.

December 31, 2015



Teresa McDaniel  
Law Office of Brian McDaniel, LLC  
Post Office Box 2085  
Beaufort, South Carolina 29901  
(843) 379-5117  
Attorney for Respondents

Other Counsel of Record:

Charles W. Thomson, Esquire  
Glynn L. Capell, Esquire  
The Capell Law Firm, LLC  
Post Office Box 6628  
Hilton Head Island, SC 29938



Law Office of  
BRIAN McDANIEL, LLC

bmcDaniel@attorneymcdaniel.com

VIA US MAIL

December 30, 2015

The Honorable Jenny Abbot Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Mark and Elizabeth Heil v. Stewart and Christina Hines, and Sam  
Imler, d/b/a/ Sam's Tree Service;  
Appellate Case No. 2015- -001988

Dear Ms. Kitchings:

Enclosed please find the originals of the **Initial Brief of the Respondents**  
with **Designation of Matter** and the **Proof of Service** for filing  
in the above referenced case.

Also enclosed is an additional copy of the documents and a stamped, self-  
addressed envelope which I would appreciate you returning to my office after  
filing. Thank you.

Sincerely,

Brian D. McDaniel  
Law Office of Brian McDaniel, LLC  
Attorney for Respondents  
SC Bar # 68618

BDM/tm

Enclosures

cc: Charles W. Thomson, Esquire  
Glynn L. Capell, Esquire  
The Capell Law Firm, LLC  
Post Office Box 6628  
Hilton Head Island, SC 29938

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Law Office of Brian McDaniel, LLC  
www.attorneymcdaniel.com  
Post Office Box 2085  
Beaufort, South Carolina 29901

To The Honorable Jenny Abbot Kitchings  
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Columbia, South Carolina 29211

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