

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

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Robin B. Stilwell, Circuit Court Judge

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Case No. 2006-CP-39-1826

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J. Scott Kunst, Respondent,

v.

David Loree, Appellant.

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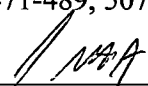
SC Court of Appeals

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

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Respondent proposes that the following be included in the Record on Appeal:

1. Order of Judge Welmaker dated March 26, 2007.
2. Supplemental Notice of Election Dated April, 12, 2007.
3. Plaintiff's Memorandum in Opposition to Defendant's JNOV Motion.
4. Plaintiff's Memorandum in Opposition to Defendant's Motion to Amend Answer and Exhibits.
5. Plaintiff's trial exhibits 1, 4, 5, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19.
6. Defendant's trial exhibits 1, 7, 8, 10, 11, 12, 13, 22, 23, 24, 25.
7. Trial transcript pages 55, 83-84, 95, 101-105, 121-129, 135-162, 179-185, 191-207, 266-274, 294-339, 347-350, 453-456, 471-489, 507-545.

  
\_\_\_\_\_  
J. Scott Kunst, Respondent, *Pro se*  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961

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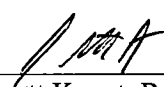
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**RESPONDENT'S CERTIFICATION OF DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

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The undersigned certifies pursuant to rule 209(c) SCACR that the Respondent's designation contains no matter which is irrelevant to the appeal.

January 28, 2016,

  
\_\_\_\_\_  
J. Scott Kunst, Respondent, *Pro se*  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961

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Robin B. Stilwell, Circuit Court Judge

Case No. 2006-CP-39-1826

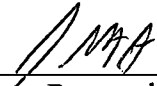
J. Scott Kunst, Respondent,

v.

David Loree, Appellant.

**PROOF OF SERVICE**

I, J. Scott Kunst, Respondent *pro se*, hereby certify that I have served the **Initial Brief of Respondent** and the **Designation of Matter to be included in the Record on Appeal** on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on January 28, 2016, addressed to the Appellant's counsel of record as follows: V. Elizabeth Wright, V. Elizabeth Wright, P.A., 217 E. Park Avenue, Greenville, SC 29601, and Gregory K. Smith, King & Spaulding, LLP, 1180 Peachtree Street, Atlanta, GA 30309.

  
\_\_\_\_\_  
J. Scott Kunst, Respondent, *Pro se*  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961

January 28, 2016

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

Re: *J. Scott Kunst v. David Loree*,  
C.A No.: 2006-CP-39-1826

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SC Court of Appeals

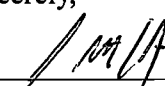
Dear Ms. Kitchings:

Please find enclosed for filing the original of the following items:

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

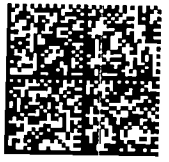
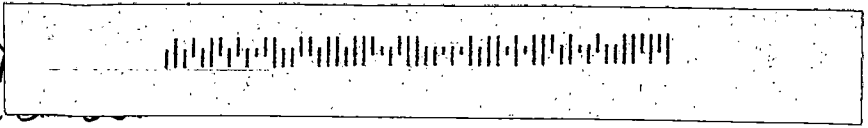
Please feel free to contact me if you have any questions.

Sincerely,

  
\_\_\_\_\_  
J. Scott Kunst  
130 Arabian Way  
Simpsonville, SC 29681  
(864) 979-7961  
*Respondent pro se*

cc: V. Wright, Esq.  
Gregory K. Smith, Esq.

Kunst  
130 Arablan Way  
Simpsonville, SC



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The Honorable Jenny Abbott Kitchings  
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