

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master-In-Equity

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Case No. 2014-CP-10-7481  
Appellate Case No. 2015-002259

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Lee & Associates Charleston, LLC,

Respondent,

v.

Chicora Gardens Holdings, LLC, Chicora  
Life Center, LC, and Jeremy Blackburn,

Of whom Chicora Gardens Holdings, LLC,  
And Chicora Life Center, LC, are

Appellants.

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

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In addition to the material proposed by Appellants, Respondent proposes the following to  
be included in the Record on Appeal:

1. Consent Order Referring Action, dated January 21, 2015.

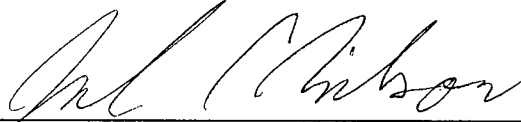
I certify that this designation contains no matter which is irrelevant to this appeal.

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SC Court of Appeals

**PIERCE, HERNS, SLOAN & WILSON, LLC**



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Carl E. Pierce, II (SC Bar No. 7946)

Joseph C. Wilson, IV (SC Bar No. 5886)

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Charleston, SC 29413

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Attorneys for Respondent Lee & Associates Charleston,  
LLC

2/10

, 2016

Charleston, South Carolina

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Appellants.

PROOF OF SERVICE

I, Kelly Forrester, an employee of Pierce, Hems, Sloan & Wilson, LLC, attorneys for the Respondents, do hereby certify that I have served a copy of the Initial Brief of Respondents and Respondents Designation of Matter to be Included in the Record on Appeal and Proof of Service, on this the 10<sup>th</sup> day of February, 2016, by U.S. Mail to the attorneys identified below:

**ATTORNEYS FOR APPELLANT:**

Steven L. Smith, Esquire  
Samuel M. Wheeler, Esquire  
Smith Closser, P.A.  
P.O. Box 40578  
Charleston, SC 29423

  
\_\_\_\_\_  
Kelly Forrester

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SC Court of Appeals

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Direct Dial: 843-725-7705  
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February 10, 2016

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

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SC Court of Appeals

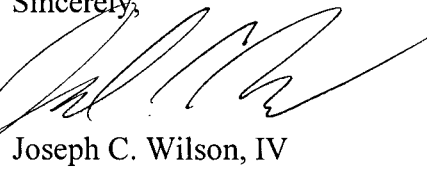
Re: *Lee & Associates v. Chicora Gardens*  
Appellate Case No. 2015-002259  
PHSW File No. P2553.00

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the Initial Brief of Respondents, Respondents' Designation of Matter to be Included in the Record on Appeal, and Proof of Service. Please return a filed copy to my attention in the envelope provided. By copy of this letter to all counsel of record, and as indicated in the Proof of Service, all counsel of record are hereby served.

With kind regards,

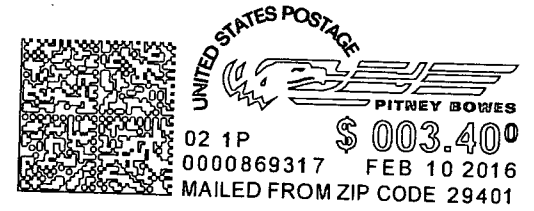
Sincerely,



Joseph C. Wilson, IV

Enclosure

cc: Steven L. Smith, Esquire  
Samuel Melvil Wheeler, Esquire

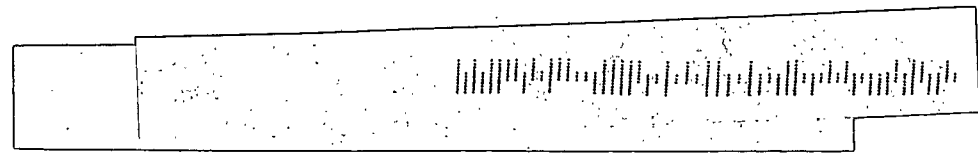


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