

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

---

Robin B. Stilwell, Circuit Court Judge

---

Case No. 2006-CP-39-1826

---

J. Scott Kunst, Respondent,

v.

David Loree, Appellant.

---

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

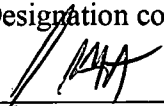
---

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

1. Order of Judge Welmaker dated March 26, 2007.
2. Plaintiff's Memorandum in Opposition to Defendant's JNOV Notion.
3. Plaintiff's Memorandum in Opposition to Defendant's Motion to Amend Answer and Exhibits.
4. Plaintiff's trial exhibits 1, 4, 5, 6, 11, 12, 13, 14, 15, 16, 17, 18, 19.
5. Defendant's trial exhibits 1, 7, 8, 10, 11, 12, 13, 22, 23, 24, 25.
6. 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.

Respondent certifies that the Amended Designation contains no matter irrelevant to the appeal.

April 5, 2016

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

**RECEIVED**

APR 08 2016

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

---

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 **Respondent's Amended 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 April 5, 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

April 5, 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

RECEIVED

APR 08 2016

SC Court of Appeals

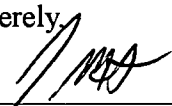
Dear Ms. Kitchings:

Please find enclosed for filing the original and six copies of the following items:

1. Motion to Amend Respondent's Designation of Matter;
2. Respondent's Amended Designation of Matter to be Included in the Record on Appeal;
3. Proof of Service; and
4. A check for the filing fee of \$25.00.

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.