

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
COURT OF COMMON PLEAS

**RECEIVED**

THE HONORABLE MARVIN H. DUKES, III, BEAUFORT COUNTY 2016  
MASTER-IN-EQUITY

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**SC Court of Appeals**

Case No.: 2011- CP-07-02497

Appellate Case No.: 2015-001568

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Quartermaster at Broad Creek Landing Owners' Association, .....Appellant,

v.

Broad Creek Landing Horizontal Property Regime, .....Respondent.

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

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

1. Order of Reference, dated May 29, 2013
2. Order, dated September 30, 2014
3. Order, dated June 19, 2015;
4. Complaint;
5. Answer;
6. Motion for Summary Judgment, dated May 6, 2013;
7. Supplemental Motion for Summary Judgment, dated May 7, 2013;
8. Memorandum in Support of Motion for Summary Judgment, dated May 28, 2013;
9. Transcript of proceedings

p. 28, lines 23-25;

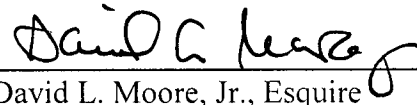
p. 40, line 17 - p. 41, line 9;  
p. 41, line 19 - p. 42, line 9;  
p. 47, line 21 - p. 48, line 12;  
p. 49, line 1 - p. 50, line 23;  
p. 51, line 1- p. 52, line 1;  
p. 57, line 19 - p. 58, line 1;  
p. 58, lines 16-25;  
p. 80, lines 8-14;  
p 93, lines 16-22;  
p. 96, lines 3-20;  
p 97, lines 15-19.

10. Exhibits

- (a) Affidavit of Ron Fenstermaker with attached exhibit "How your quartermaster fee is calculated;"
- (b) Declaration of dissolution by forfeiture of Quartermaster at Broad Creek Landing;
- (c) Declaration of dissolution by forfeiture of Broad Creek Landing Horizontal Property Regime, Inc.;
- (d) Certificate of Reinstatement for Broad Creek Landing Horizontal Property Regime, Inc.;
- (e) Reciprocal Easement and Amenity Use Agreement;
- (f) Amended Reciprocal Easement and Amenity Use Agreement; and
- (g) Articles of Incorporation for Quartermaster at Broad Creek Landing Owners Association, Inc. (filed 5/16/13).

*(Signature on Next Page)*

Respectfully submitted,



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David L. Moore, Jr., Esquire  
Turner Padgett Graham & Laney P.A.  
200 East Broad Street, Suite 250  
Greenville, SC 29601  
Telephone: (864) 552 to 4600  
Fax: (864) 552 to 4620

June 6, 2016

*Attorneys for Broad Creek Landing  
Horizontal Property Regime*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

THE HONORABLE MARVIN H. DUKES, III  
BEAUFORT COUNTY MASTER-IN-EQUITY

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JUN 06 2016

SC Court of Appeals

Case No.: 2011-CP-07-02497

Appellate Case No.: 2015-001568

Quartermaster at Broad Creek Landing Owners' Association.....Appellant,

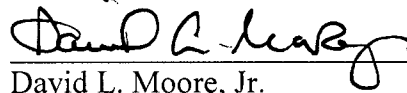
vs.

Broad Creek Landing Horizontal Property Regime.....Respondent.

**CERTIFICATE OF SERVICE**

I, David L. Moore, Jr., an employee at TURNER, PADGET, GRAHAM & LANEY, P.A., Attorneys for Respondents in the above referenced matter, hereby certify that I have served the **INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTERS** on Terry A. Finger, Esquire, Attorney for Appellant, by depositing one copy of the same in the United States Mail, postage prepaid, on June 6, 2016, addressed to:

Terry A. Finger, Esquire  
Finger, Melnick & Brooks, P.A.  
Post Office Box 24005  
Hilton Head, SC 29925-4005

  
David L. Moore, Jr.

Greenville, South Carolina  
June 6, 2016

# Turner | Padget

REPLY TO:

David L. Moore Jr.

E-Mail: DMoore@turnerpadget.com  
Writer's Direct Dial: (864) 552-4625  
Writer's Direct Fax: (864) 282-5966

June 6, 2016

Honorable Jenny Abbott Kitchings  
Clerk of Court for the SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
JUN 06 2016  
SC Court of Appeals

Re: **Quartermaster at Broad Creek Landing Owners' Association v. Broad Creek Landing Horizontal Property Regime**  
Appellate Case No.: 2015-001568  
TP File No.: 10728.112

Dear Ms. Kitchings:

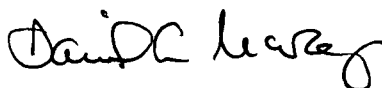
Please find enclosed the original and one copy of *Respondent's Designation of Matters to be Included in the Record on Appeal; Initial Brief of Respondent and Certificate of Service* in the above captioned matter. Please return the filed and stamped copy to me in the self-addressed and stamped envelope provided.

By copy of this letter to Appellant's counsel, Terry Finger, I am providing him with a copy of the above.

With kind regards, I am

Sincerely yours,

TURNER PADGET GRAHAM & LANEY P.A.



David L. Moore Jr.

DLM:mjs  
Enclosures

TPGL 6943513v1

# Turner | Padget

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Honorable Jenny Abbott Kitchings

June 6, 2016

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cc: John Wilkerson, Esquire  
Terry A. Finger, Esquire