

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr. Circuit Court Judge

Appellate Case No. 2016-000432

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JUL 21 2016

SC Court of Appeals

Linda A. Gibson, individually and in capacity as
Trustee of the PAUL WILLIAM GIBSON FAMILY TRUST;
HERITAGE SEVEN, LLC; SEVEN OAKS APARTMENTS, LLC;
and 3205 PALM BOULEVARD, LLC..... Appellants,

vs.

ANDREW K. EPTING, JR., LLC; Andrew K. Epting, Jr.;
GEORGE J. KEFALOS, P.A.; George J. Kefalos;
GEDNEY M. HOWE, III, P.A.; Gedney M. Howe, III;
JOHN S. WEST, ATTORNEY-AT-LAW, LLC; and John S. West..... Respondents.

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

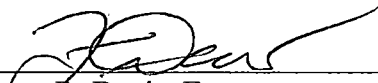
Appellant proposes the following additional matter be included in the Record on Appeal:

1. Deposition of Linda A. Gibson dated May 7, 2015, 263:1-4; 154:24-25; 176:2-8; 110:1-25; 263: 1-4;
2. Deposition of Paul Tecklenburg dated November 6, 2013, 53:15-25; 54:1-25; 55:1-25; 56:1-25; 64:1-8; 65:21-25; 139:3-13; 140:9-22; 141:1-25;
3. Deposition of Michael Danhour dated August 21, 2014, 68:1-25; 69:1-25
4. Defendants' Mem. Of Law in Support of Summary Judgment;
5. Galt Valley, LLC, statements and invoices;
6. Hearing Transcript in its entirety, and at 17:1-15 herein;
7. Deposition of George J. Kefalos dated September 18, 2014, 27:10-25; 28:1-20;

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

Respectfully submitted,

Thomas A. Pendarvis, J.D.
Christopher W. Lempesis, Jr., J.D., L.L.M.
PENDARVIS LAW OFFICES, P.C.
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Counsel for Appellants

July 18, 2016

Charleston, South Carolina

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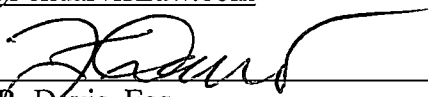
PROOF OF SERVICE

I, James R. Davis, Esq., a lawyer with J. DAVIS LAW FIRM, P.C., certify that I have served one (1) copy of APPELLANTS' ADDITIONAL DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL on counsel for Respondents, by electronic mail and by depositing a copy of the same in the United States Mail, postage prepaid, on the 18th day of July, 2016 addressed to:

M. Dawes Cooke, Jr., J.D.
Jeremy E. Bowers, J.D.
BARNWELL, WHALEY PATTERSON & HELMS, LLC
PO Drawer H
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SC Court of Appeals

VIA US MAIL

July 18, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Attention: V. Claire Allen
Post Office Box 11629
Columbia, South Carolina 29211

Re: Linda A. Gibson, et. al., v. Andrew K. Epting, et. al,
Appellate Case No. 2016-000432
Our File No.: 2016057

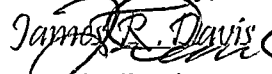
Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of the Initial Reply Brief of Appellants, Appellant's Additional Designation of Matter to be Included in Record on Appeal, and Proof of Service in connection with the above referenced matter.

Kindly return the clocked copies in the enclosed pre-paid self-addressed return envelope at your convenience. Thank you in advance for your attention to this matter.

With kind regards, I am

Yours very truly,


James R. Davis

JRD/jrd

cc: M. Dawes Cooke, Jr., Esq., Barnwell Whaley Patterson & Helms, LLC
Jeremy Bowers, Esq., Barnwell Whaley Patterson & Helms, LLC
Thomas Pendarvis, Esq., Pendarvis Law Offices, P.C.
Ms. Linda A. Gibson

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SC Court of Appeals



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The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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