

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

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NOV 18 2016

SC Court of Appeals

Case No. 2014-CP-40-5683  
Appellate Case No.: 2014-001521

South State Bank, f/k/a SCBT, a South Carolina state chartered banking Corporation, d/b/a First Federal, a Division of SCBT . . . . .Plaintiff/Respondent,

v.

Three Amigos Land Co., LLC, a South Carolina limited liability company; River City Storage, LLC, a Florida limited liability company; Ramco River City, Inc., a Michigan corporation; Liberty River City Residential, LLC, a Florida limited liability company; Ramco Jacksonville, LLC, a Michigan limited liability company; George M. Lee, III, an individual; and Paul V. Degenhart, an individual, . . . . .Defendants,

Of whom Paul V. Degenhart is the Appellant.

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

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

*From the matters filed in the Courts of the State of Florida.*

1. Complaint filed November 15, 2011.
2. Defendant's Motion to Dismiss filed April 20, 2012.
3. Order Granting Defendant's Motion to Dismiss filed June 27, 2012.
4. Amended Complaint filed July 9, 2012.
5. Defendant's Answer to Amended Complaint dated July 16, 2012.
6. Partial Summary Final Judgment for Damages filed March 12, 2013.
7. Amended Final Judgment for Deficiency filed February 27, 2014.
8. Defendant's Motion for Rehearing or to Amend Amended Final Judgment for Deficiency dated March 13, 2014.
9. Order Denying Motion for Rehearing or to Amend dated June 27, 2014.

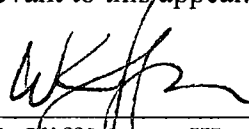
10. Defendant's Notice of Appeal to the First District Court of Appeals dated July 18, 2014.
11. Order of the District Court of Appeals, First District filed February 12, 2015.
12. Defendant's Motion for Rehearing dated February 23, 2015.
13. Defendant's Motion to Dismiss for Lack of Subject Matter Jurisdiction dated March 9, 2015.
14. Order of the District Court of Appeals, First District Denying Rehearing, Clarification and Certification and Motion to Dismiss filed March 18, 2015.
15. Motion for Rehearing dated March 30, 2015.
16. Order of the District Court of Appeals, First District Denying Motion for Rehearing filed April 24, 2015.

*From the matters filed in the Courts of the State of South Carolina.*

17. Notice of Filing Foreign Judgment, Amended Judgment for Deficiency and Affidavit filed September 16, 2014.
18. Defendant's Motion for Relief from Foreign Judgment filed December 17, 2014.
19. Order Staying Enforcement filed March 4, 2015.
20. Order Lifting Stay filed July 30, 2015.
21. Order Denying the Defendant Paul V. Degenhart's Motion for Relief From Foreign Judgment and Order for Entry of Judgment Against Paul V. Degenhart Only filed June 28, 2016.

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

November 18, 2016

  
\_\_\_\_\_  
W. Cliff Moore, III  
Adams and Reese LLP  
Post Office Box 2285  
Columbia, South Carolina 29202  
(803) 254-4190  
Attorney for Respondent

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v.

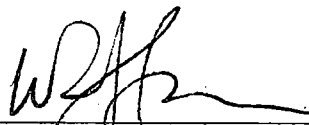
Three Amigos Land Co., LLC, a South Carolina limited liability company; River City Storage, LLC, a Florida limited liability company; Ramco River City, Inc., a Michigan corporation; Liberty River City Residential, LLC, a Florida limited liability company; Ramco Jacksonville, LLC, a Michigan limited liability company; George M. Lee, III, an individual; and Paul V. Degenhart, an individual, .....Defendants,

Of whom Paul V. Degenhart is the Appellant.

PROOF OF SERVICE

I certify that I have served the Respondent's Initial Brief and Respondent's Designation of Matter to be Included in the Record on Appeal on Paul V. Degenhart by depositing a copy of them in the United States Mail, postage prepaid, on November 18, 2016, addressed to him, 2131 Park Street, Columbia, South Carolina 29201.

November 18, 2016

  
W. Cliff Moore, III  
Adams and Reese LLP  
Post Office Box 2285  
Columbia, South Carolina 29202  
(803) 254-4190  
Attorney for Respondent

# ADAMS AND REESE LLP

November 18, 2016

Via Hand Delivery

The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, South Carolina

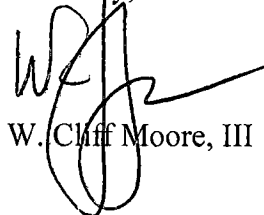
RE: South State Bank, Respondent v. Paul V. Degenhart, Appellant  
Case No. 2014-CP-40-5683  
Appellate Case No. 2016-001521  
A&R File No. 050589-000020

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter is the original and one copy of the Respondent's Initial Brief, Respondent's Designation of Matter to Be Included in the Record on Appeal, and Proof of Service. Please file the originals and return the clocked-in copies to me via our courier. By copy of this letter, I am serving Mr. Degenhart with the brief and designation as set forth in the enclosed Proof of Service.

Thank you for your attention to this matter.

Sincerely,



W. Cliff Moore, III

WCMIII/jas

cc: via U.S. Mail w/encl.

Paul V. Degenhart, Esq.  
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2131 Park Street  
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## Attorneys at Law

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