

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHESTER COUNTY  
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

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Appellate Case No. 2016-001004

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**RECEIVED**

FEB 16 2017

SC Court of Appeals

Heather Rousey Piper, Plaintiff,

v.

Kerry Grissinger, William P. Hardee, and Paul E. Lesondak, Defendants,

Of Whom Kerry Grissinger and Paul E. Lesondak are the Appellants,

and Of Whom Heather Rousey Piper is the Respondent.

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DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL

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Pursuant to Rule 209, SCACR, in addition to those matters designated by Appellant, the Respondent hereby designates the following matter to be included in the record on appeal in this action:

**TRIAL EXHIBITS**

**Exhibit A:** Plat of Survey dated October 30, 2014

**Exhibit B:** Plat of Survey dated October 30, 2014 with markings

**Exhibit C:** Photographs produced by Plaintiff through discovery

**Exhibit D:** Plat dated November 15, 1951, recorded in Book I, at Page 1

**Exhibit E:** Plat dated November 16, 1951, recorded in Book I, at Page 4

**Exhibit F:** Plat dated November 27, 1951, recorded in book I, at Page 45

**Exhibit G:** Plat of Survey dated March 28, 2012 and recorded in Plat Book D183, at Page 8B, on May 16, 2012

**Exhibit H:** Plat of Survey dated June 27, 1988 and recorded in Plat Book B102, at Page 2, on June 20, 1988

**Exhibit I:** Plat of Survey dated December 9, 1997 and recorded in Plat Book C130, at Page 9B, on March 11, 1998

**Exhibit J:** That certain Deed dated November 19, 1951 and recorded in Deed Book 371, at Page 79, on November 19, 1951

**Exhibit K:** That certain Deed dated November 19, 1951 and recorded in Deed Book 371, at Page 95, on November 24, 1951

**Exhibit L:** That certain Deed of Distribution dated October 3, 1997 and recorded in Deed Book 724, at Page 176, on October 7, 1997

**Exhibit M:** That certain Deed dated October 18, 1952 and recorded in Deed Book 373, at Page 92, on November 3, 1952

**Exhibit N:** Discovery responses and documents produced by Defendant William P. Hardee, dated August 21, 2015

**Exhibit O:** Letter from Joan E. Winters dated October 23, 2014

**Exhibit P:** Letter from Sally Hudson dated December 18, 2014

**Exhibit Q:** Letter from Joan E. Winters dated December 11, 2014

**Exhibit R:** GIS maps from Chester County

**Exhibit S:** Residential Title Insurance Policy with attached Plat, File 13-04-060 LESONDAK

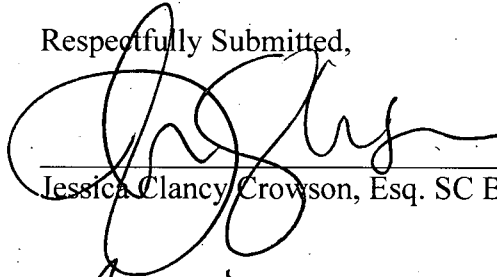
**Exhibit T:** Affidavit of William Severance Lee

## **PLEADINGS**

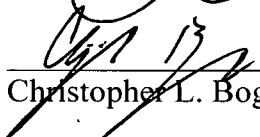
- Plaintiff's Complaint and Lis Pendens, filed January 20, 201, with Exhibits
- Answer of Defendant Grissinger and Lesondak, dated March 3, 2015
- Answer of Paul Hardee, dated February 14, 2015
- Amended Answer and Counterclaim of Grissinger and Lesondak, filed July 6, 2015
- Transcript of Hearing held on March 14, 2016
- Order of the Trial Court, dated May 3, 2016 and filed May 9, 2016

The undersigned counsel for the Respondent certifies that the Designation contains no matter that is irrelevant to the appeal.

Respectfully Submitted,



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Jessica Clancy Crowson, Esq. SC Bar No. 68626



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Christopher L. Boguski, Esq. SC Bar No.: 100546

ROGERS LEWIS JACKSON MANN & QUINN, LLC  
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*Attorneys for Respondent*

February 16, 2017

Opposing Counsel

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Rock Hill, SC 29731-6106

*Attorney for Appellant*

With Copy To:

William P. Hardee

976 Columbia Road

Chester, SC 29706

*Pro Se Defendant*

# ROGERS LEWIS

ATTORNEYS AT LAW

Christopher L. Boguski  
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February 16, 2017

**Via Hand Delivery**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**FEB 16 2017**

**SC Court of Appeals**

RE: *Heather Rousey Piper v. Kerry Grissinger, et al.*  
Appellate Case No. 2016-001104

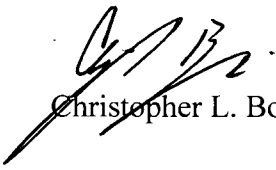
Dear Ms. Kitchings:

I have enclosed for filing an original and two copies of Respondent's Designation of Matter to be Included On Appeal, Initial Brief of Respondent, and Proof of Service, regarding the above referenced case. Please return a stamped copy to me of these filings.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,

**ROGERS LEWIS JACKSON MANN & QUINN, LLC**



Christopher L. Boguski

Enclosures

cc: John Martin Foster  
PO Box 106  
Rock Hill, SC 29731  
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William P. Hardee  
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*Pro Se Defendant*