

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
S. JACKSON KIMBALL, SPECIAL CIRCUIT COURT JUDGE

Case Nos. 2015-CP-01409  
Appellate Case No.: 2016-001921

IN RE:

Deborah Dereede Living Trust  
dated December 18, 2013

Hugh Dereede and  
Tyre Dealer Network Consultants, Inc. .... Respondents,

v.

Courtney Feeley Karp, Individually and  
As Trustee of the Deborah Dereede Living  
Trust dated December 18, 2013 and Michael Fehily ..... Defendants,

Of which,

Courtney Feeley Karp, Individually and  
As Trustee of the Deborah Dereede Living  
Trust dated December 18, 2013 is ..... Appellant.

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JUN 02 2017

**RESPONDENTS' DESIGNATIONS SC Court of Appeals**

Pursuant to Rule 209, SCACR, Respondents propose the following to be included in the Record on Appeal, and certify that this designation contains no matter that is irrelevant to this appeal. Unless otherwise stated, all items designated include exhibits and exclude proofs of service, cover sheets, motion forms, and notices. Respondents reserve the right to include additional designations in connection with his initial brief or otherwise.

**ORDERS**

1. Order on Motion for Removal, May 4, 2015
2. Order Denying Motion to Dismiss, June 11, 2015 (Form 4)
3. Order Denying Summary Judgment, February 29, 2016 (Form 4)
4. Order Denying Rule 59(e) Motion, March 16, 2016 (Form 4)
5. Order of Judge Kimball, June 15, 2016
6. Order on Motion for Reconsideration, September 12, 2016
7. Order on Attorney's Fees, November 4, 2016

**PLEADINGS**

8. Summons and Complaint, December 23, 2014
9. Motion for Removal to Circuit Court, Motion to Dismiss, Affirmative Defenses and Amended Answer, March 15, 2015
10. Amended Answer, March 23, 2015

**MOTIONS**

11. Motion for Judgment on the Pleadings, May 13, 2015
12. Motion for Summary Judgment, September 2, 2015
13. Amended Motion for Summary Judgment, November 6, 2015
14. Second Amended Motion for Summary Judgment, February 17, 2016
15. Appointment of Trust Protector, February 26, 2016
16. Motion for Reconsideration, March 10, 2016
17. Amended Motion to Reconsider, June 21, 2016

**TRIAL COURT EXHIBITS**

18. Plaintiffs' Exhibits 1, 5, 6, 11

19. Defendant's Exhibit 1

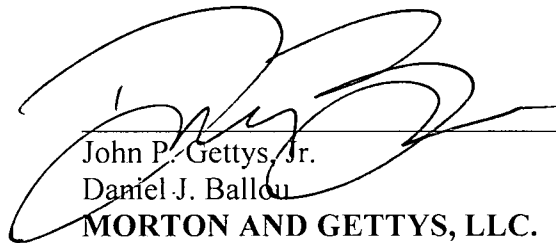
**TRANSCRIPTS**

20. Transcript of Proceedings at pp. 35-44; 103-108; 114-123; 136; 139-145; 152-158; 208-209; 217-219.

**OTHER DOCUMENTS**

- 21. Affidavit of Hugh Dereede, June 5, 2015
- 22. Affidavit of Courtney Feeley-Karp, August 18, 2015
- 23. Affidavit of Edward J. Ribadeneira, August 12, 2015
- 24. Affidavit of Alan Medlin, February 23, 2016
- 25. Report of Trust Protector, January 25, 2016
- 26. Defendant's Interrogatories, Requests for Production and Requests for Admission to Tyre Dealer Network Consultants, Inc. and Hugh Dereede, June 24, 2015
- 27. Answers to Requests to Admissions from Dereede dated 7-23-2015 and Tyre Dealer Network Consultants dated 7-23-2015)

Respectfully submitted,



John P. Gettys, Jr.  
Daniel J. Ballou

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May 30, 2017

**ATTORNEYS FOR RESPONDENTS**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable S. Jackson Kimball, III, Special Circuit Court Judge

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Case No.: 2015-CP-46-01409  
Appellate Case No. 2016-001921

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Courtney Feeley Karp, et al.,

Appellant,

v.

Hugh Dereede, et al.

Respondent.

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**PROOF OF SERVICE**

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The undersigned certifies that he has served this Respondents' Designations on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on May 30, 2017, addressed to its attorney of record, Desa Ballard, P.O. Box 6338, West Columbia, South Carolina 29171 and Peter J. Nosal, 852 Gold Hill Road; Suite 201, Fort Mill, South Carolina 29708.

5/30, 2017  
Rock Hill, South Carolina

  
Leah Anderson McCraney  
Paralegal for Morton & Gettys

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SC Court of Appeals

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Certified Family Court Mediator †  
Certified Specialist in Estate Planning  
and Probate Law ¶

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Licensed in SC, GA, FL & NC ‡  
Licensed in SC, TX (Inactive) •

May 30, 2017

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: ***In re: Deborah Dereede Living Trust dated December 18, 2013***  
**Appellate Case No. : 2016-001921**

Ms. Kitchings:

Enclosed please find the original and one copy of the Respondents' Initial Brief and Respondents' Designations.

Please file the original and return the clocked copies in the self-addressed stamped envelope provided. Please do not hesitate to contact our office with any questions. I can be reached directly at 803-366-3425. With kind regards, I am

Sincerely,

  
Leah Anderson McCraney  
Paralegal for Daniel J. Ballou

DJB/lm

enclosure

cc: CLIENT (via electronic mail)  
Pete Nosal, Esquire (via regular mail)  
Desa Ballard, Esquire (via regular mail)

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JUN 02 2017

SC Court of Appeals

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