

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
The Honorable Carmen T. Mullen, Circuit Court Judge

Civil Action No. 2015-CP-07-01980

RECEIVED
NOV 03 2017
SC Court of Appeals

In Re: Eleanor McCarthy Lenahan Trust under agreement Dated July 12, 2001.

Kathleen Suzanne Heslin and Maureen Theresa Mosley, in their capacities as
Cotrustees of the Eleanor McCarthy Lenahan Trust under agreement
dated July 12, 2001.....Appellants,

v.

Mary Kathleen Lenahan, individually and in her capacity as Trustee of the Art.
X(35) MKL Trust Share UAD 071201, Jean Marie Qualliu, Joan Eleanor
DeMaio, and Christine Ann Lenahan

Of Whom Mary Kathleen Lenahan and
Jean Marie Qualliu areRespondents.

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

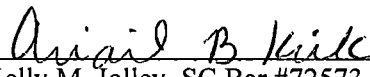
Pursuant to Rule 209, SCACR, Respondents propose the following be included in the
Record on Appeal:

1. Fourth Amendment and Restatement of Trust Agreement of Eleanor McCarthy
Lenahan, dated February 22, 2012;
2. Release, Consent Indemnification and Hold Harmless Agreement
signed November 10, 2014;
3. Petition for Declaratory Judgment filed August 17, 2015;
4. Order for Removal to Circuit Court filed August 17, 2015;
5. Order of the Honorable Marvin H. Dukes, III filed July 13, 2016;
6. Respondents Mary Kathleen Lenahan's and Jean Marie Qualliu's Motion for Partial
Summary Judgment filed November 4, 2016;
7. Affidavit of Jean Marie Qualliu filed November 4, 2016;
8. Affidavit of Mary Kathleen Lenahan filed November 4, 2016;

9. Transcript of February 2, 2017 hearing;
10. Form 4 Order of the Honorable Carmen T. Mullen, granting Respondents' Motion for Partial Summary Judgment, dated February 3, 2017;
11. Appellants' Notice of Motion and Motion for Reconsideration, Alteration, and/or Amendment filed February 10, 2017;
12. Respondents Mary Kathleen Lenahan's and Jean Marie Qualliu's Memorandum in Response to Appellants' Motion for Reconsideration, Alteration, and/or Amendment filed March 8, 2017;
13. Supplemental Order of the Honorable Carmen T. Mullen, upholding grant of partial summary judgment to Respondents, dated March 14, 2017.

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

JOLLEY LAW GROUP, LLC



Kelly M. Jolley, SC Bar #72573

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Attorneys for the Respondents

November 3, 2017

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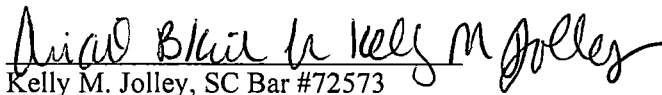
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PROOF OF SERVICE

I certify that I have served the Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal upon Appellants Kathleen Suzanne Heslin and Maureen Theresa Mosley by depositing a copy of same in the United States Mail, postage prepaid, on November 3, 2017, addressed to Appellants' attorneys of record, Sean Michael Bolchoz, Esquire and Douglas S. Delaney, Esquire.

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