

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas
Jean Hoefer Toal, Circuit Court Judge

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SC Court of Appeals

Case No. 2016-CP-10-01833
Appellate Case No. 2017-001270

Andrew and Kimberly McIntire,

Appellants,

v.

Sequest Development Company, Inc.; Red Bay Constructors Corp.;
Benzenberg Custom Cabinets, Inc.; Jonathan Marshall Construction;
Coastal Window & Door Center of Charleston, LLC; Carolina Window &
Millwork, LLC n/k/a Carolina Window & Millwork-Omni Glass Industries, LLC;
Southcoast Exteriors, Inc.; Michael Casteen d/b/a Casteen Custom Cabinets;
Quality Cedar Products, Inc. of Michigan d/b/a Michigan Prestain Co.;
Coastal Plumbing & Gas, LLC; Foam Insulation Co. Inc.; Jerry Comer d/b/a
Jerry's Tile & Marble, LLC; Lowcountry Fireplaces, Inc.;
Carolina Pest Solutions, Inc.; New South Construction Supply, LLC,

Defendants,

Of whom Sequest Development Company, Inc., is the

Respondent.

RESPONDENT'S DESIGNATION OF MATTER

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley, Jr. (SC Bar No. 994)
Jason A. Daigle (SC Bar No. 73308)
Russell G. Hines (SC Bar No. 72100)
Post Office Box 993
Charleston, South Carolina 29402
(843) 720-5488
Counsel for Respondent

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

Orders, Judgments, Decrees, or Decisions

1. Order of Dismissal;
2. Form 4 filed May 1, 2017;
3. Notice of Entry of Judgment;

Pleadings

4. Complaint;

Transcripts

5. Transcript of Hearing held October 13, 2016;

Other Material or Documents

Motions and Memoranda

6. Plaintiffs' Motion to Stay and Compel Arbitration;
7. Seaquest's Memorandum in Opposition to Plaintiff's Motion to Stay and Compel Arbitration, *with* exhibits A, B, and D;
8. Seaquest's Supplemental Memorandum in Opposition to Plaintiffs' Motion to Stay and Compel Arbitration;
9. Plaintiffs' Reply in Support of Motion to Stay and Compel Arbitration;
10. Plaintiffs' Motion for Protective Order;
11. Seaquest's Motion to Dismiss or Stay Proceedings;
12. Seaquest's Memorandum in Support of Motion to Stay or Dismiss Proceedings;

Documents

13. Law Clerk's Email of January 4, 2017;
14. Seaquest's Counsel's Email of January 13, 2017, *with* attached Proposed Order;

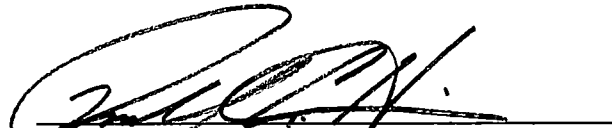
15. The McIntires' Counsel's Email of January 20, 2017, *with* attached Letter of even date.

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

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

Edward D. Buckley, Jr. (SC Bar No. 994)

Jason A. Daigle (SC Bar No. 73308)

Russell G. Hines (SC Bar No. 72100)

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Charleston, South Carolina 29402

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Counsel for Respondent

Charleston, South Carolina

Dated: 11/3/17

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Defendants,

Of whom Sequest Development Company, Inc., is the

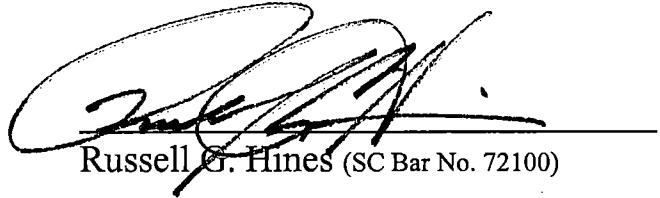
Respondent.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley, Jr. (SC Bar No. 994)
Jason A. Daigle (SC Bar No. 73308)
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Counsel for Respondent

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondent, hereby certify that the **INITIAL BRIEF OF RESPONDENT** and **RESPONDENT'S DESIGNATION OF MATTER** were served on all other parties to this matter by depositing a copy of same in the U.S. Mail on November 3, 2017, properly posted for delivery to the following addressees:

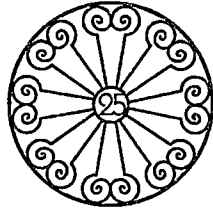
ANDREW K. EPTING, JR., LLC
Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire
46A State Street
Charleston, South Carolina 29401
Counsel for Appellants



Russell G. Hines (SC Bar No. 72100)

Charleston, South Carolina

Dated: 11/3/17



YCR LAW

Russell G. Hines
Partner

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November 3, 2017

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

Re: Andrew and Kimberly McIntire v. SeaQuest Development Company, Inc., et al
Appellate Case No. 2017-001270
Case No.: 2016-CP-10-1833
Claim No.: 100-00-002622
Date of Loss: 7/24/2008
YCR File: 9795-20160374

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Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and one copy of Initial Brief of Respondent, Respondent's Designation of Matter, and Proof of Service regarding the same.

Kindly return one clocked copy in the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Russell G. Hines
Partner

RGH/amj
Enclosures

cc: Andrew K. Epting, Jr., Esquire
Jaan Gunnar Rannik, Esquire

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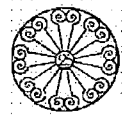
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Court
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