

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Roger M. Young, Sr., Circuit Court Judge

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Trial Court Case No.  
2015-CP-10-3550

Appellate Case No. 2017-00866

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**RECEIVED**  
FEB 07 2018  
SC Court of Appeals

Richard Ralph and Eugenia Ralph.....Appellants,

v.

Paul Dennis McLaughlin and Susan Rode McLaughlin.....Respondents.

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RESPONDENTS' DESIGNATION OF MATTERS  
TO BE INCLUDED IN THE RECORD ON APPEAL

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G. Hamlin O'Kelley, III  
S.C. Bar No. 15491  
Buist, Byars & Taylor, LLC  
652 Coleman Blvd., Suite 200  
Mt. Pleasant, SC 29464  
(843) 856-4488

Attorneys for Respondents

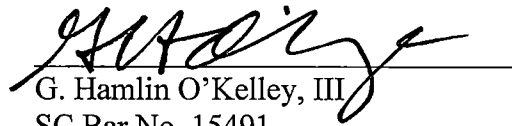
The Respondents propose the following items to be included in the Record, on Appeal:

1. Order Denying Plaintiffs' Motion for New Trial, March 2, 2017;
2. Verdict Form, Jan. 26, 2017
3. Consent Order pursuant to Rule 40(j) SCRCP;
4. Consent Order, June 23, 2015;
5. Order Denying Motion for Summary Judgment by the Plaintiffs, June 7, 2016;
6. Order Denying Motion for Summary Judgment by the Defendants, June 7, 2016;
7. Ordering Granting Summary Judgment to the Seabrook Island Property Owners Association, June 7, 2016;
8. Form Four Order, Defendants' Trial Ex. 6
9. Withdrawal of Temporary Restraining Order, Defendants' Trial Ex. 5;
10. Summons and Complaint, September 30, 2011;
11. Answer and Third Party Complaint, December 6, 2011;
12. Seabrook Island Property Owners Association Answer, Jan. 6, 2012;
13. Motion to Amend, Jan. 30, 2013;
14. Amended Complaint, July 17, 2013;
15. Answer to Amended Complaint, July 22, 2013;
16. Plaintiffs' Motion for Partial Summary Judgment, Feb. 14, 2014
17. Affidavit of J. Howard Yates, Jr., Esq.;
18. Defendants' Motion for Summary Judgment, Feb. 19, 2014;
19. Seabrook Island Property Owners Association Motion for Summary Judgment, Feb. 2, 2014;
20. Motion to Restore, May 11, 2015;
21. Renewed Motion for Partial Summary Judgment by the Plaintiffs, March 17, 2016;
22. Renewed Motion for Summary Judgment by the Defendants, March 25, 2016;
23. Renewed Motion for Summary Judgment by the Seabrook Island Property Owners Association Motion, March 28, 2016;
24. Plaintiffs' Motions for New Trial, Feb. 3, 2017;
25. Defendants' Reply to Plaintiffs' Post-Trial Motion, Feb. 13, 2017;
26. Notice of Appeal, March 31, 2017;
27. Transcript of the Trial, Jan. 23-26, 2017;
28. Transcript of Richard Ralph Deposition, Oct. 8, 2013;
29. Transcript of John Thompson Deposition, June 12, 2014;
30. Transcript of Paul McLaughlin Deposition, Oct. 11, 2013;
31. Jury Charges, January 26, 2017;
32. Seabrook Island Property Owners Association Property Owners Association Minutes, May 20, 2002;
33. Title to Real Estate for McLaughlins,
34. Title to Real Estate for Ralphs
35. Plat from E.M. Seabrook, 1984, Plaintiffs' Trial Ex. 2
36. Plat from E.M. Seabrook 1987, Plaintiffs' Trial Ex. 4
37. Plat from Forsberg Engineering, 2002, Plaintiffs' Trial Ex. 5

38. Minutes from Seabrook Island Property Owners Assoc., May 22, 2002, Defendants' Trial Ex. 1;
39. September 9, 2002, Letter from Carroll Gantz, Ex. A. to Defendants' Third Party Complaint;
40. August 18, 2006, approval of Plans by Coy Foster, ARB Administrator, Ex. F to Defendants' Third Party Complaint;
41. June 19, 2007, letter to McLaughlins from Seabrook Island Property Owners Association, Defendants' Trial Ex. 3,
42. September 22, 2008, email, from John Thompson to the Ralphs and McLaughlins, Richard Ralph Deposition, Ex. 9;
43. All Matters Designated by the Appellants.

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

Respectfully submitted



G. Hamlin O'Kelley, III  
SC Bar No. 15491

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Mount Pleasant, South Carolina

*Feb. 5*, 2018

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PROOF OF SERVICE

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The undersigned hereby certifies that a true copy of the Respondents' Initial Brief and Designation of Matters to be Included in the Record on Appeal were served upon G. Dana Sinkler, Esq., at 2180 Rosebank Plantation Road, Wadmalaw Island, SC 29487 and Ainsley F. Tillman, Esq., 29 Brisbane Drive, Charleston, SC 29407, by United States Mail, first class, postage prepaid on the 5<sup>th</sup> Day of February, 2017



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Attorneys for Respondents

February 5, 2018

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G. HAMLIN O'KELLEY, III  
ATTORNEY AT LAW  
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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

*Re: Richard Ralph and Eugenia Ralph v. Paul Dennis McLaughlin and Susan  
Rhode McLaughlin, et al.  
Appellate Case No. 2017-000866  
File No.: 1219.0003*

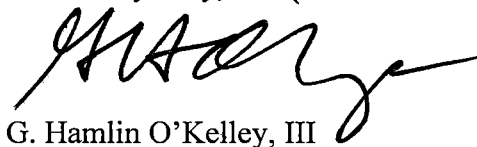
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter are an original and one (1) copy of the following:

1. Respondents' Initial Brief;
2. Respondents' Designation of Matters to be Included in the Record on Appeal;
3. Proof of Service.

Please file the originals and return a file-stamped copy to me in the enclosed envelope. By copy of this letter, I am serving same upon G. Dana Sinkler, Esq., and Ainsley F. Tillman, Esq., attorneys for the Appellants. Should you have any questions or concerns, please feel free to contact me. With kind regards, I remain

Yours very truly,



G. Hamlin O'Kelley, III

GHOIII/act  
Enclosures

cc. (w/enc.) G. Dana Sinkler, Esq.  
Ainsley F. Tillman, Esq.



**BUIST, BYARS & TAYLOR, LLC**  
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