

STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

The Honorable Kristi L. Harrington, Circuit Court Judge

Case Number: 2015-CP-10-06615

(Appellate Case Number: 2017-001532)

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APR 23 2018

SC Court of Appeals

BOUCHELLE INCORPORATED,.....APPELLANT,

vs.

CHARLESTON WRECKING, INC. and MICHAEL C. GOLEMIS.....RESPONDENTS.

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

In addition to the materials identified by Appellant in the Amended Designation of Matter to be Included in the Record on Appeal, Respondents propose the following be included in the Record on Appeal:

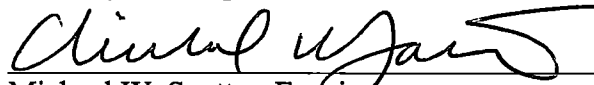
1. Golemis Motion for Summary Judgment and Exhibits filed January 9, 2017:
 - a) Exhibit A – Defendant Charleston Wrecking, Inc.’s First Request for Admissions to Plaintiff dated February 2, 2016
 - 1) ConsensusDocs 751 Standard Short Form Agreement between Constructor and Subcontractor and Charleston Wrecking, Inc., 05/20/15 Demolition Pricing For 7350 Cross County Road;
 - 2) Affidavit of Michael Golemis dated December 27, 2016;
 - 3) Charleston Wrecking, Inc., Certificate of Existence;
 - 4) Charleston Wrecking, Inc., Articles of Incorporation;
 - 5) Charleston Wrecking, Inc., Registered Agent Information;

- 6) South Carolina Code § 33-18-250 and Official Comments.
2. Charleston Wrecking, Inc. Motion for Summary Judgment and Exhibits dated filed March 31, 2017:
 - a) Exhibit A – Affidavit of Michael Golemis dated December 27, 2016;
 - b) Exhibit B - Defendant Charleston Wrecking, Inc.’s First Request for Admissions to Plaintiff dated February 2, 2016;
 - c) Exhibit C - ConsensusDocs 751 Standard Short Form Agreement between Constructor and Subcontractor and Charleston Wrecking, Inc., 05/20/15 Demolition Pricing Sheet;
 - d) Exhibit D – Correspondence from Blair Claims Management to David Bouchelle dated September 15, 2015
 - e) Exhibit E – Civil Action Coversheet, Summons and Complaint for Case Number 2016-CP-10-4984 filed September 20, 2016;
 - f) Exhibit F – Canopus US Insurance Inc.’s Answer in Case Number 2016-CP-10-4984 filed January 9, 2017.
 3. Charleston Wrecking, Inc.’s Motion for Stay of Defendants filed March 31, 2017;
 4. Transcript of May 17, 2017, hearing before the Honorable Kristi L. Harrington;
 5. Order of the Honorable Kristi L. Harrington filed June 8, 2017;

Respectfully submitted,



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Attorney for Respondent Charleston Wrecking, Inc.



Michael W. Sautter, Esquire
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April 18, 2018

Other Counsel of Record:

Karen M. Dejong, Esquire
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Attorney for Appellant

STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

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The Honorable Kristi L. Harrington, Circuit Court Judge **APR 23 2018**

Case Number: 2015-CP-10-06615

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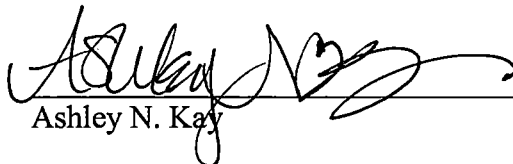
vs.

CHARLESTON WRECKING, INC. and MICHAEL C. GOLEMIS.....RESPONDENTS.

PROOF OF SERVICE

I, Ashley N. Kay, hereby certify that I have served copies of the foregoing Joint Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal, in connection with the above-referenced case on April 18th, 2018, by sending copies of the same via United States Mail and addressed as follows:

Karen M. Dejong, Esquire
DeJong Law Firm, LLC
940 Johnnie Dodds Blvd., Ste. 203
Mt. Pleasant, SC 29464
Attorney for Appellant



Ashley N. Kay

Charleston, South Carolina
April 18th, 2018

O. Grady Query*

*Certified Circuit Court
Arbitrator & Mediator

*Certified National Trial
Advocacy Civil Trial Specialist



Michael W. Sautter
Managing Partner

Michael H. Ellis, Jr.
Attorney

Brooke Hurt Maiden
Attorney

Query Sautter & Associates
Attorneys and Counselors at Law

April 18, 2018

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SC Court of Appeals

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

**RE: Bouchelle Incorporated v. Charleston Wrecking, Inc. &
Michael C. Golemis
Appellate Case No.: 2017-001532**

Dear Ms. Kitchings:

Enclosed please find the original and one copy Joint Initial Brief of Respondents Charleston Wrecking, Inc. and Michael C. Golemis, Respondents' Designation of Matter to be Included in the Record on Appeal and Counsel's Certification in connection with the above-referenced case. Please file the originals and return the certified copies to me in the enclosed envelope. By copy of this letter, I am serving Karen M. Dejong, Esquire, counsel for the Appellant, with the same.

Your attention to this request is greatly appreciated. Please do not hesitate to contact our office should you have any questions.

With best wishes, I remain

Sincerely,

Ashley N. Kay,
Law Clerk to
Michael W. Sautter

/ank

Enclosures as stated

cc: Karen M. Dejong, Esquire, with enclosures

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The Honorable Jenny Abbott Kitchings
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