

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. THOMAS COOPER, JR., Circuit Court Judge

Case No. 2016-CP-40-05001

Appellate Case No.: 2017-002181

RECEIVED

MAY 17 2018

SC Court of Appeals

Tina Bessinger.....Appellant,

v.

Longcreek Plantation Property Owners Association, Inc., Halcyon Real Estate Services, LLC.,
Fairways Development, LLC, and Advantage Services, Inc.,
.....Respondents

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

The Appellant proposes that the following be included in the Record on Appeal:

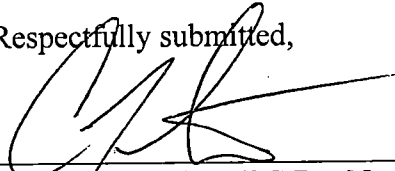
1. Civil Action Coversheet, Summons and Complaint
2. Certificate of Service by Certified Mail for LongCreek Development, LLC
3. LongCreek Plantation Property Owners Association, Inc.'s Answer to Plaintiff's Complaint
4. Affidavit of Default (LongCreek Development, LLC)
5. Amended Summons and Amended Complaint
6. Defendant LongCreek Plantation Property Owners Association, Inc.'s Answer to the Plaintiff's Amended Complaint
7. Defendant Advantage Services, Inc., Answer to Plaintiff's Amended Complaint
8. Certificate of Service by Certified Mail to LongCreek Development, LLC's registered agent with Amended S&C
9. Defendant Halcyon Real Estate Services, LLC's Answer to the Plaintiff's Amended Complaint
10. Affidavit of Default for LongCreek Development, LLC

11. Amended Affidavit of Default for LongCreek Development, LLC
12. Withdrawal of Affidavit of Default
13. Fairways Development, LLC's Answer to the Amended Complaint
14. Defendant Advantage Services, Inc.'s Motion for Summary Judgment
15. Defendant Longcreek Plantation Property Owners Association, Inc.'s Motion for Summary Judgment
16. Consent Scheduling Order
17. Defendant Fairways Development, LLC Motion for Summary Judgment
18. Defendant Longcreek Plantation Property Owners Association, Inc.'s Memorandum in Support of Motion for Summary Judgment
19. Deposition of Tina Bessinger, March 9, 2017, pgs. 16, 23-25, 37, 41
20. Deposition of Jeannie Sharpe, March 9, 2017, pgs. 12-13, 15-17, 24-31, 34, 78-81, Ex. 4, Ex. 5
21. Deposition of Amber Edwards, March 9, 2017, pgs. 6, 10-11, 40
22. Deposition of David Peterson, March 21, 2017, pgs. 6, 9, 11-16, 20, 31-32, 40-41
23. Deposition of Melissa Crook, March 21, 2017, pgs. 24, 26, 30, 56
24. Plaintiff's Memorandum in Opposition to Defendant LongCreek Plantation Property Owners Association, Inc.'s; Halcyon Real Estate Services, LLC's; Fairways Development, LLC's; and Advantage Services, Inc.'s Motions for Summary Judgment ("Plaintiff's Memorandum in Opposition to Motions for Summary Judgment")
25. LongCreek Plantation, <http://LongCreekplantation.com/> (last visited Aug. 25, 2017).
26. Accident Report (attached as Exhibit C to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
27. Halcyon Real Estate Services, LLC Management Agreement ("Halcyon Agreement") (attached as Exhibit E to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
28. Advantage Services, Inc. Landscaping & Irrigation Maintenance Agreement (Advantage Agreement) (attached as Exhibit F to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
29. Photographs from Google Earth, Sept. 2011 (attached as Exhibit H to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
30. Photographs from Google Earth, October 2014 (attached as Exhibit J to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
31. Declaration of Covenants and Restrictions of LongCreek Plantation Property Owners' Association, Inc. and Fairways Development General Partnership, pgs. 60-62 (attached as Exhibit L to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment)
32. Deeds to Streets and Roadways Easements – LongCreek Plantation Phase IV, Blocks 4-A, 4-C, & 4-D (attached as Exhibit to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
33. Deed to Fairways Partnership, Agreement of Conversion, and LongCreek Plantation Plats (see specifically areas referenced on plats as "Buffer – Fairways Development" which contain the entrance in question) (attached as Exhibit N to Plaintiff's Memorandum in Opposition to Motions for Summary Judgment).
34. Trial Transcript from September 9, 2017 Hearing
35. 2017 Google Maps Image of Ansel School Road
36. Order Granting Advantage Services, Inc.'s Motion for Summary Judgment

37. Order Granting LongCreek Plantation Property Owners Association, Inc.'s and Halcyon Real Estate Services, LLC's Motion for Summary Judgment
38. Order Granting Fairways Development, LLC's Motion for Summary Judgment.
39. September 15, 2017 letter to The Honorable G. Thomas Cooper, Jr.
40. CD containing Photographs and Video of the collision provided to The Honorable G. Thomas Cooper, Jr. on September 15, 2017.

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

Respectfully submitted,



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PROOF OF SERVICE

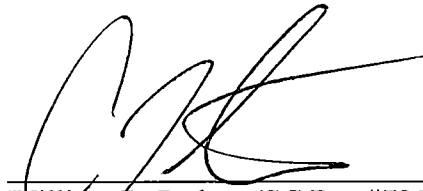
I certify that I have served the Appellant's Reply Brief and Appellant's Designation of Matter to Be Included in the Record on the Defendants by depositing a copy of it in the United States Mail, postage prepaid, on May 17, 2018, addressed to their attorney of record, listed below to the following addresses:

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May 17, 2018



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May 17, 2018

Margaret M. Rock
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Reply to:
Columbia Office

VIA HAND DELIVERY

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

RE: Tina Bessinger v. LongCreek Plantation Property Owners Association, Inc.,
LongCreek Development, LLC, Fairways Development, LLC,
Advantage Services, Inc. and Halcyon Real Estate Services, LLC.
Appellate Case No.: 2017-002181

Dear Ms. Kitchings:

Attached please find an original and one (1) copy of the Appellant's Reply Brief and the Appellant's Designation of Matter in the above matter. Please file the originals and return a clocked copy to me, via our courier.

By copy of this letter, we are also serving a copy of the same on all opposing counsel. Should you have any questions or comments, please do not hesitate to contact our office.

Sincerely,

Margaret M. Rock
Senior Litigation Paralegal

/mmr

Enclosures

cc: Karl S. Brehmer, Esq. (w/enclosures)
Anthony W. Livoti, Esq. (w/enclosures)
Mark S. Barrow, Esq. (w/enclosures)

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