

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Larry B. Hyman, Circuit Court Judge

Case No. 2016-CP-26-4464

RECEIVED

NOV 19 2018

SC Court of Appeals

Jill Keck Humphries, Dennis L. Johnson, Jr., Delona Penny Rice, Whitmel L. Brown, Jr., Gary Steven Robinson, Elizabeth Erin Humphries, and Nancy H. Johnson Plaintiffs,

v.

Tilghman Beach and Racquet Club Condominium Association, Inc., James H. Austin, III, Daniel G. Coe, C. Doug Madison, George P. White and Steele Brice Windle, III, individually and as Members of the Board of Directors of the Tilghman Beach and Racquet Club Condominium Association, Inc. Respondents,

v.

Great American Insurance Company Appellant.

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

In addition to those materials previously designated by the Appellants, Respondents, Tilghman Beach and Racquet Club Condominium Association, Inc., et al. ("TBRC"), propose the following matter to be included in the Record on Appeal:

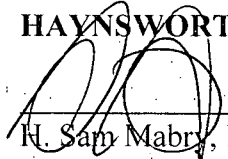
1. TBRC's Answer to Third Amended Complaint filed April 7, 2017
2. Stipulation (Exhibit A to Order remanding case filed October 18, 2016)
3. Consent Motion for Leave to File Third-Party Complaint filed March 28, 2017
4. Order granting Consent Motion filed May 2, 2017

Each of the above items and those previously designated by the Appellant should include all attached exhibits. If the identical document is attached to multiple designated items, TBRC consents to the item only being included in the Record on Appeal one time; however, the index should note all attachments to each item as filed and provide the page number in the Record on Appeal where that item can be found.

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

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.



H. Sam Mabry, III, SC Bar No. 3490

smabry@hsblawfirm.com

Joshua D. Spencer, SC Bar No. 74782

jspencer@hsblawfirm.com

Bonnie A. Lynch, SC Bar No. 77399

blynch@hsblawfirm.com

Sarah P. Spruill, SC Bar No. 68337

sspruill@hsblawfirm.com

One North Main Street, Second Floor

Greenville, SC 29601

Telephone: (864) 240-3200

and

THE PEARCE LAW GROUP, PC

Charles B. Jordan, Jr., S.C. Bar No. 11708

cjordan@pearcelawgroup.com

1314 Professional Drive, Suite 202

Myrtle Beach, SC 29577

Telephone: (843) 839-3210

Attorneys for Respondents, Tilghman Beach and Racquet Club Condominium Association, Inc., James H. Austin, III, Daniel G. Coe, C. Doug Madison, George P. White and Steele Brice Windle, III, individually and as Members of the Board of Directors of the Tilghman Beach and Racquet Club Condominium Association, Inc.

November 16, 2018

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Larry B. Hyman, Circuit Court Judge

Case No. 2016-CP-26-4464

RECEIVED

NOV 19 2018

SC Court of Appeals

Jill Keck Humphries, Dennis L. Johnson, Jr., Delona Penny Rice, Whitmel L. Brown, Jr., Gary Steven Robinson, Elizabeth Erin Humphries, and Nancy H. Johnson Plaintiffs,

v.

Tilghman Beach and Racquet Club Condominium Association, Inc., James H. Austin, III, Daniel G. Coe, C. Doug Madison, George P. White and Steele Brice Windle, III, individually and as Members of the Board of Directors of the Tilghman Beach and Racquet Club Condominium Association, Inc. Respondents,

v.

Great American Insurance Company Appellant.

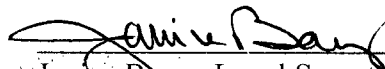
PROOF OF SERVICE

I certify that I have served the *Initial Brief of Respondents* and *Designation of Matter to be Included in the Record on Appeal* upon all counsel of record by depositing copies of the same in the United States Mail, First Class postage prepaid, on this the 16th day of November, 2018, addressed as follows:

Howell V. Bellamy III, Esq.
Howell V. Bellamy Jr., Esq.
Bellamy, Rutenberg, Copeland, Epps, Gravely & Bowers, P.A.
1000 29th Avenue North
Myrtle Beach, South Carolina 29577
HBellamyIII@bellamylaw.com
nrichardson@bellamylaw.com

Charles B. Jordan, Jr., Esq.
The Pearce Law Group, PC
1314 Professional Drive
Myrtle Beach, SC 29577
cjordan@pearcelawgroup.com

Kirby D. Shealy III, Esq.
Justine M. Tate, Esq.
Adams and Reese LLP
1501 Main Street, 5th Floor
Columbia, SC 29201
kirby.shealy@arlaw.com
justine.tate@arlaw.com



Janise Barry, Legal Secretary
Haynsworth Sinkler Boyd, P.A.
P.O. Box 2048
Greenville, South Carolina 29602
864.240.3223

**HAYNSWORTH
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.
ONE NORTH MAIN STREET, 2ND FLOOR
P.O. BOX 2048 (29602)
GREENVILLE, SOUTH CAROLINA 29601
MAIN 864.240.3200
FAX 864.240.3300
www.hsblawfirm.com

RECEIVED

SARAH P. SPRUILL
DIRECT 864.240.3220
sspruill@hsblawfirm.com

NOV 19 2018

SC Court of Appeals

November 16, 2018

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

Re: Jill Keck Humphries, Dennis L. Johnson, Jr., Delona Penny Rice, Whitmel L. Brown, Jr., Gary Steven Robinson, Elizabeth Erin Humphries, and Nancy H. Johnson v. Tilghman Beach and Racquet Club Condominium Association, Inc., James H. Austin, III, Daniel G. Coe, C. Doug Madison, George P. White and Steele Brice Windle, III, individually and as Members of the Board of Directors of the Tilghman Beach and Racquet Club Condominium Association, Inc. v. Great American Insurance Company
Appellate Case No. 2018-001180

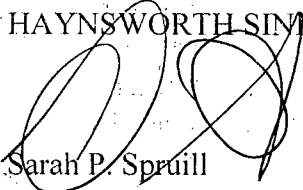
Dear Ms. Kitchings:

Enclosed herewith for filing is an original and one (1) copy of the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal regarding the above-referenced case together with a Proof of Service. Please file the originals and return a clocked copy to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.


Sarah P. Spruill

SPS/jmb

Enclosures

cc: Howell V. Bellamy III, Esq.
Howell V. Bellamy Jr., Esq.
Charles B. Jordan, Jr., Esq.
Kirby D. Shealy III, Esq.
Justine M. Tate, Esq.



U.S. POSTAGE >> PITNEY BOWES

ZIP 29601 \$ 007.25⁰
02 4W
0000355738 NOV 16 2018

**HAYNSWORTH
SINKLER BOYD**
P.O. BOX 2048
GREENVILLE, SOUTH CAROLINA 29602-2048

RECEIVED
NOV 18 2018
SC Court of Appeals

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

