

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SALUDA COUNTY  
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2018-001388

Stephen Wilkinson, as Trustee of George B. Buchanan,  
Jr. Irrevocable Family Trust Dated the 15th day of July,  
2001, .....

Respondent,

v.

Redd Green Investments, LLC, Anderson North Augusta,  
LLC, Herbert Anderson, Jr., A. Bruce Green, Herbert  
Keith Anderson, and L. Cliff Redd,.....

Defendants,

Of which Redd Green Investments, LLC, A. Bruce  
Green, and L. Cliff Redd are.....

Appellants.

DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, respondent Stephen Wilkinson, as Trustee of George B. Buchanan, Jr. Irrevocable Family Trust Dated the 15th day of July, 2001, designates the following material for inclusion in the record on appeal, in addition to all material designated by Appellants.

**Pleadings**

1. Plaintiff's Reply to Counterclaim of Redd Green Investments, LLC, A. Bruce Green, and L. Cliff Redd.

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SC Court of Appeals

**Motions, Memoranda, and Responses**

2. Appellants' Memorandum in Support of Motion for a New Trial or in the Alternative to Alter or Amend the Judgment of the Court.

3. Plaintiff's Opposition to Motion for a New Trial.

**Exhibits and Other Materials**

4. Exhibit A to Complaint – Loan Agreement and Nov. 16, 2010 Amendment to Loan Agreement.

5. Exhibit 1 to Affidavit in Support of Plaintiff's Motion for Summary Judgment and Motion to Amend Caption to Designate Successor Trustee as Real Party in Interest – Appointment of Successor Trustee and Resignation of Trustee.

6. Exhibit A to Plaintiff's Memorandum in Support of Motion to Dismiss Counterclaims – entire exhibit.

The undersigned counsel certifies, pursuant to Rule 209(c) of the South Carolina Appellate Court Rules, that this designation contains no matter which is irrelevant to the appeal.

*(signature page attached)*

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Buchanan, Jr. Irrevocable Family Trust Dated the 15th day of  
July, 2001*

Columbia, South Carolina

November 26, 2018

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APPEAL FROM SALUDA COUNTY  
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PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough, L.L.P., attorneys for Stephen Wilkinson, as Trustee of George B. Buchanan, Jr. Irrevocable Family Trust Dated the 15<sup>th</sup> day of July, 2001, do hereby certify that I have served all counsel and/or parties in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleading(s): Designation of Matter to be Included in the Record on Appeal

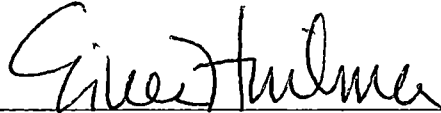
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**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RE: Stephen Wilkinson, as Trustee of George B. Buchanan, Jr. Irrevocable Family Trust  
Dated the 15th day of July, 2001 vs. Redd Green Investments, LLC, et al.  
Appellate Case No. 2018-001388  
Our File No. 047587/01500

Dear. Ms. Kitchings:

Enclosed please find the original and one copy of Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced matter. We would ask that you file the originals and return clocked-in copies to us via our courier.

By copy of this letter to counsel of record, we are serving them with copies of same.

Very truly yours,



A. Mattison Bogan

AMB:eh  
Enclosure

cc: M. Alan Peace, Esquire  
Roy R. Hemphill, Esquire  
Gene Trotter, Esquire  
Wallace K. Lightsey, Esquire  
William M. Wilson, III, Esquire