

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

HONORABLE MARVIN H. DUKES, III
BEAUFORT COUNTY MASTER-IN-EQUITY AND
SPECIAL CIRCUIT COURT JUDGE

CASE NO.: 2014-CP-07-0052
APPELLATE CASE NO.: 2018-001969

RECEIVED
JAN 04 2019
SC Court of Appeals

Lady Beaufort, LLC &
Tideland Realty, Inc.

Respondents/Appellants,

vs.

Hird Island Investments, Inc., Sherwood N. Fender,
Addison D. Fender, Martha B. Fender, William B. Bowen,
Lady Kemmerlin, LLC, Brickyard Holdings, Inc. and
A&K Holding Co., LLC,

Defendants,

AND

William M. Bowen,

Third-Party Plaintiff,

v.

James S. Kerr and Matt Trumps,

Third-Party Defendants,

Of Which Hird Island Investments, Inc.
and Sherwood N. Fender are

Appellants/Respondents.

DESIGNATION OF MATTER TO BE INCLUDED
IN RECORD ON APPEAL OF APPELLANTS/RESPONDENTS

H. Fred Kuhn, Jr., Esquire
Moss, Kuhn & Fleming, P.A.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
843-524-3373 - telephone
843-524-1302 – facsimile

Attorneys for the Appellants/ Respondents

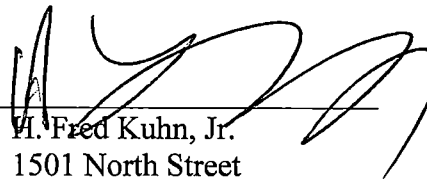
In addition to those documents previously designated by the Respondents/Appellants, the Appellants/Respondents Hird Island Investments, Inc. and Sherwood N. Fender designate the following documents to be included in the Record on Appeal:

1. Answer and Counterclaim of Hird Island Investments, Inc. to Amended Complaint dated June 11, 2014.
2. Answer to Second Amended Complaint and Counterclaim of Hird Island Investments, Inc. and Sherwood N. Fender filed November 13, 2014.
3. Order of Reference filed November 23, 2014.
4. Order Granting in Part and Denying in Part Defendants' Motion to Reconsider filed February 14, 2018.
5. Tab 2 of Exhibit 1 (attorneys fee affidavits) to March 1, 2017 trial.
6. Pages numbered 1, 2, 3, 4, 5, 6, 7, 8 and 9 of Exhibit 1 (Interrogatory answer) to July 23, 2018 trial (copies attached).

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

MOSS, KUHN & FLEMING, P.A.

By: _____



W. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373 - Telephone
(843)524-1302 - Facsimile
Email: fred@mossandkuhn.com

Beaufort, South Carolina
January 2, 2019

Attorneys for the Appellants/Respondents

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

HONORABLE MARVIN H. DUKES, III
BEAUFORT COUNTY MASTER-IN-EQUITY AND
SPECIAL CIRCUIT COURT JUDGE

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Hird Island Investments, Inc., Sherwood N. Fender,
Addison D. Fender, Martha B. Fender, William B. Bowen,
Lady Kemmerlin, LLC, Brickyard Holdings, Inc. and
A&K Holding Co., LLC,

Defendants,

AND

William M. Bowen,

Third-Party Plaintiff,

v.

James S. Kerr and Matt Trumps,

Third-Party Defendants,

Of Which Hird Island Investments, Inc.
and Sherwood N. Fender are

Appellants/Respondents.

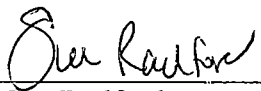
CERTIFICATE OF SERVICE

Undersigned certifies that **Designation of Mater to be Included in Record on Appeal**,
to which this certificate is affixed, was served upon the party (s) to this action by hand delivery

or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire
46A State Street
Charleston, South Carolina 29401
Attorneys for the Respondent
Lady of Beaufort, LLC

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on January 2, 2019.

By:  _____
Sue Radford

STATE OF SOUTH CAROLINA
COUNTRY OF BEAUFORT

LADY BEAUFORT, LLC. & TIDELAND
REALTY INC.,

Plaintiffs,

v.

HIRD ISLAND INVESTMENTS, INC. AND
SHERWOOD FENDER,

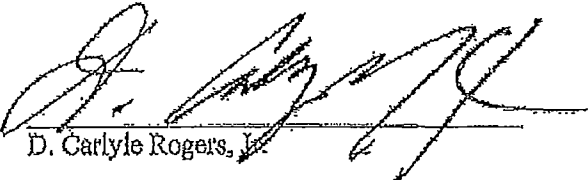
Defendants.

IN THE COURT OF COMMON PLEAS
FOR THE FOURTEENTH CIRCUIT

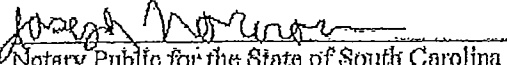
Case No. 2014-CP-07-0052

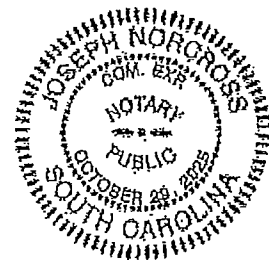
AFFIDAVIT OF ATTORNEYS FEES

1. My name is D. Carlyle Rogers, Jr., and I am a practicing attorney licensed in the state of South Carolina since 1986.
2. I represented the Plaintiff, Lady Beaufort, LLC in the attempted closing with Hird Island, LLC as well as the successful closing of the transaction between Lady Beaufort, LLC and Inverness, LLC.
3. I also assisted Lady Beaufort with the filing of a *lis pendens* on the property at issue in this case located at 9 Sams Point Rd as well as with putting the Seller, Hird Island, LLC on notice of its default under its contract with Lady Beaufort.
4. The total attorney's fees and cost associated with the aforementioned legal services was \$7,857.00.


D. Carlyle Rogers, Jr.

Sworn to and Subscribed before me
On this 23 day of February 2017


Notary Public for the State of South Carolina
My Commission expires: 10/24/2025



Andrew K. Epting, Jr. LLC
 46A State Street
 Charleston, SC 29401

Kerr, James J.
 AMCS, Inc.
 PO Box 1302
 John's Island, SC 29467

Date: 5/15/2014

Regarding: 2086-001 Lady Beaufort
 Invoice No: 20081279

Services Rendered

Date	Description	Hours	Charges
11/26/2013	Administratively open file, conflicts check, terms of engagement in E-mail, preliminary review of documents	1.50	\$375.00
12/27/2013	Review Rannik report and Lis Pendens	0.60	\$270.00
12/27/2013	Prepare Lis Pendens, letter to Clerk; conference with AKE; conference with AGG regarding [REDACTED]	0.50	\$125.00
12/27/2013	Telephone call with Dean regarding [REDACTED]	0.20	\$50.00
12/30/2013	Telephone call with Rogers	0.30	\$135.00
1/02/2014	Review file and prepare Summons, Complaint and Lis Pendens	1.80	\$375.00
1/08/2014	Review pleading and confer with client	0.60	\$225.00
1/14/2014	Review suit and call with Kerr	0.60	\$270.00
1/14/2014	Review Complaint filed by Mathison	0.50	\$125.00
1/14/2014	Conference with AGG regarding [REDACTED]	0.50	\$125.00
1/17/2014	Review suit and confer with MNE regarding [REDACTED]	0.50	\$225.00
1/18/2014	Conference with AKE regarding [REDACTED]	0.30	\$75.00
2/04/2014	Telephone call with client and confer with MNE regarding [REDACTED]	0.50	\$225.00
2/04/2014	Conference with AKE	0.30	\$75.00
2/05/2014	Review Answer and Counterclaim of Hird	0.40	\$100.00
2/10/2014	Review claim; review Motion to Dismiss; confer with MNE regarding [REDACTED]	1.30	\$585.00
2/10/2014	Conference with AKE regarding [REDACTED]	0.30	\$75.00
2/10/2014	Prepare Motion to Dismiss or In the Alternative Consolidate Inverness suit into Lady Beaufort's suit	0.70	\$175.00
2/11/2014	Conference with MNE regarding [REDACTED]; call with client	0.60	\$270.00
2/11/2014	Conference with AKE	0.20	\$50.00
2/18/2014	Review Answer, Counterclaim and Motion to Dismiss of Inverness	0.50	\$125.00
2/18/2014	E-mail Correspondence with Mathison	0.20	\$50.00
2/19/2014	Review pleadings, memo of client; confer with MNE; memo to client	1.20	\$540.00
2/20/2014	Conference with AKE regarding [REDACTED]	0.40	\$100.00
2/21/2014	Telephone call with client; review opposition response and call with client	0.80	\$360.00
2/21/2014	E-mail Correspondence with Mathison	0.20	\$50.00
2/26/2014	Review memo and call with client	0.40	\$180.00
2/27/2014	Review counsel and client memos; call with client and confer with MNE regarding [REDACTED]; review letter	1.30	\$585.00
2/28/2014	E-mail Correspondence with client	0.20	\$50.00
2/28/2014	Conference with AKE	0.30	\$75.00

3/01/2014	Telephone call with client and MNE over two days; review proposals and call with client	1.00	\$450.00
3/01/2014	Conference with AKE regarding [REDACTED]	0.40	\$100.00
3/02/2014	Prepare memo to MNE and confer with client	0.60	\$270.00
3/03/2014	Review memos; calls with MNE and client	1.20	\$540.00
3/03/2014	Prepare Release of Lis Pendens	0.40	\$100.00
3/03/2014	Review memo of AKE; call with AKE; call with Mr. Kerr; E-mail memos with Mr. Kerr and E-mail to Mathison	1.20	\$300.00
3/04/2014	Telephone call with client; review memos regarding [REDACTED] and call with MNE	0.80	\$360.00
3/05/2014	Prepare settlement conclusion	0.30	\$135.00
3/05/2014	E-mail Correspondence with Mathison	0.30	\$75.00
3/07/2014	Telephone call with MNE regarding [REDACTED]	0.20	\$90.00
3/07/2014	Prepare Answer to H/d Counterclaim and call with AKE	1.30	\$325.00
3/11/2014	Telephone call with Kerr and confer with MNE regarding [REDACTED]	0.60	\$270.00
3/11/2014	Conference with AKE regarding [REDACTED]	0.30	\$75.00
3/18/2014	Conference with client	0.30	\$135.00
3/19/2014	Review memos and confer with client	0.30	\$135.00
3/24/2014	Prepare Answer to Counterclaim of Inverness	0.50	\$125.00
3/24/2014	Telephone call with client and confer with MNE	0.30	\$135.00
3/25/2014	Conference with AKE	0.20	\$50.00
3/25/2014	Review memo and call with client	0.30	\$135.00
4/07/2014	E-mail Correspondence with Mathison	0.20	\$50.00
4/08/2014	Review counsel memos and confer with MNE	0.40	\$180.00
4/14/2014	Conference with AKE regarding [REDACTED]	0.30	\$75.00
4/14/2014	Prepare Motion for continuance and proposed Order; call with clerk	0.60	\$125.00
4/14/2014	E-mail Correspondence with Mathison regarding Hearing	0.60	\$150.00
4/15/2014	Review settlement proposal and [REDACTED]	0.40	\$180.00
4/15/2014	E-mail Correspondence with client regarding [REDACTED]	0.20	\$50.00
4/16/2014	Conference with MNE regarding [REDACTED]	0.70	\$315.00
4/16/2014	Prepare memo to AKE regarding [REDACTED]; conference with AKE regarding [REDACTED]	0.80	\$200.00
4/16/2014	E-mail Correspondence with Mathison regarding settlement, drainage, access, and easement	0.40	\$100.00
4/21/2014	Review counsel memos; confer with MNE	0.60	\$270.00
4/21/2014	E-mail Correspondence with Judge's Clerk and Mathison regarding [REDACTED]; conference with AKE	0.50	\$125.00
4/21/2014	Conference with AKE	0.30	\$75.00
4/22/2014	Telephone call with counsel and client and confer with MNE	0.60	\$270.00
4/22/2014	Conference with AKE regarding [REDACTED] and memo to AKE regarding M. Trumps	0.30	\$75.00
4/22/2014	E-mail Correspondence with Heather in Judge's office	0.20	\$50.00
4/30/2014	Telephone call with client	0.20	\$90.00
5/03/2014	E-mail Correspondence with Mathison	0.20	\$50.00
5/04/2014	Review Mathison Motion to dissolve Lis Pendens	0.30	\$75.00
5/05/2014	Conference with MNE regarding [REDACTED]; review Mathison memo	0.70	\$315.00
5/05/2014	Prepare for Hearing; [REDACTED]; research [REDACTED]; pull caselaw for use at Hearing; create argument notebook	3.40	\$850.00

5/05/2014	Conference with AKE regarding [REDACTED]	0.50	\$125.00
5/06/2014	Conference with MNE regarding [REDACTED] [REDACTED]; call to client	0.80	\$360.00
5/06/2014	Appear at Hearing on all outstanding Motions; conference with AKE on [REDACTED]	1.80	\$450.00
5/06/2014	Review proposed Order prepared by Mathison; conference AKE regarding [REDACTED]	1.20	\$300.00
5/07/2014	Prepare Lady Beaufort version of Order; memo to Judge Dukes regarding objections to Inverness proposed Order and new version	1.40	\$350.00
5/07/2014	E-mail Correspondence with Judge's Clerk	0.20	\$50.00
5/07/2014	E-mail Correspondence with Mathison regarding Orders	0.30	\$75.00
5/08/2014	Review competing Orders and Court memo	0.40	\$100.00
5/13/2014	Review Order signed by Judge Dukes; conference AKE	0.60	\$150.00
Total Fees			\$15,580.00

<u>Expenses</u>		<u>Charges</u>
<u>Start Date</u>	<u>Description</u>	
1/08/2013	#3366 Filing Fee - Summons and Complaint	\$150.00
11/26/2013	#3316 Filing Fee - Lis Pendens	\$10.00
12/20/2013	#3325 Tupper Ormsley & Deat - Reimbursement Filing Fee Lis Pendens	\$10.00
12/20/2013	#3327 Jaan Rannik - Research	\$610.00
2/07/2014	#3390 - Asset Protection & Investigation - Service of Process	\$235.00
3/11/2014	#3395 Clerk of Court - Filing Fee - Motion to Dismiss or In Alternative to Consolidate	\$25.00
4/11/2014	#3437 Clerk of Court - Motion for Continuance	\$25.00
Total Expenses		\$1,065.00
Total New Charges		\$16,625.00

Staff Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Andrew K Epting	19.90	\$450.00
Michelle Nicole Endemann	27.60	\$250.00

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Andrew K. Epting, Jr, LLC
 46A State Street
 Charleston, SC 29401

Kerr, James J.
 AMCS, Inc.
 PO Box 1302
 John's Island, SC 29467

Date: 6/04/2016

Regarding: 2008-001 Lady Beaufort
 Invoice No: 20081448

Services Rendered

Date	Description	Hours	Charges
6/27/2014	Telephone call to Bowen	0.30	\$135.00
12/22/2014	Travel to and appear at Deposition of Sample and conferences with Fender and Bowen	8.00	\$2,000.00
1/06/2015	Review discovery and draft Answers; review Email memos of Kerr regarding [REDACTED]; conference with AKE	1.70	\$425.00
3/02/2015	Review Consent Order to Refer as signed and memo from Judge regarding Reference Fee; memo to Judge	0.40	\$100.00
4/28/2015	Review letter from Bowen	0.20	\$50.00
5/12/2015	E-mail Correspondence with Bowen	0.30	\$75.00
5/28/2015	Prepare draft Responses to Discovery; review file for [REDACTED]	3.40	\$850.00
6/08/2015	[REDACTED] Emails E-mail Correspondence with client regarding [REDACTED]	0.20	\$50.00
6/09/2015	E-mail Correspondence with Bowen; conference with AGG Service of Discovery	0.40	\$100.00
6/15/2015	E-mail Correspondence with client regarding [REDACTED]	0.20	\$50.00
6/18/2015	E-mail Correspondence with client regarding [REDACTED]	0.20	\$50.00
6/26/2015	E-mail Correspondence with client forward to [REDACTED]	0.20	\$50.00
6/29/2015	E-mail Correspondence regarding [REDACTED]; conference with AKE	0.60	\$125.00
6/30/2015	E-mail Correspondence with Cindy regarding mediation	0.20	\$50.00
7/01/2015	Prepare Mediation Notebook, [REDACTED]	2.60	\$625.00
7/02/2015	Review Email of client regarding [REDACTED]	0.20	\$50.00
8/12/2015	Prepare Discovery to Fender and Hird	0.60	\$125.00
2/11/2016	Telephone call with Bowen regarding status of Discovery Requests	0.30	\$75.00
2/12/2016	Review Notices of Deposition of Plaintiffs	0.30	\$75.00
3/01/2016	Telephone call with Perry and Emails regarding Depositions and outstanding Discovery	0.60	\$150.00
3/03/2016	E-mail Correspondence with Bowen	0.30	\$75.00
3/03/2016	Conference with AGG regarding [REDACTED] and conference with AKE regarding [REDACTED]	0.40	\$100.00
3/10/2016	E-mail Correspondence with Trumps regarding [REDACTED]	0.20	\$50.00
3/11/2016	E-mail Correspondence with client	0.20	\$50.00
3/15/2016	E-mail Correspondence with Bowen	0.20	\$50.00
3/17/2016	E-mail Correspondence with Trumps regarding [REDACTED]	0.30	\$75.00
3/29/2016	E-mail Correspondence with Rogers	0.20	\$50.00
3/30/2016	Prepare Notices of Deposition of Hird Fender and Gilbert and prepare Subpoena for Gilbert's file	0.70	\$175.00

3/31/2016	E-mail Correspondence with Trumps	0.20	\$50.00
3/31/2016	Review memo from Judge's Clerk and respond	0.30	\$75.00
3/31/2016	E-mail Correspondence with Rogers regarding [REDACTED]	0.40	\$100.00
3/31/2016	E-mail Correspondence with Bowen	0.30	\$75.00
4/04/2016	E-mail Correspondence with Trumps	0.20	\$50.00
4/04/2016	E-mail Correspondence with Rogers	0.20	\$50.00
4/04/2016	Telephone call with Gilbert regarding Attorney to respond to Subpoena	0.30	\$75.00
4/06/2016	E-mail Correspondence with Bowen	0.60	\$150.00
4/06/2016	E-mail with Perry and update Judge Dukes; Appear at meeting with Trumps and review file; Conference with AGC regarding [REDACTED]; Email with Rogers regarding [REDACTED]; E-mail with Gilbert and call to Gilbert and Wood; Call with Client	2.00	\$500.00
4/13/2016	E-mail Correspondence with Gilbert's Attorney; call to Bowen regarding file and claim of privilege	0.50	\$125.00
4/20/2016	E-mail Correspondence with Rogers	0.20	\$50.00
4/26/2016	E-mail Correspondence with Judge's Clerk	0.20	\$50.00
5/10/2016	E-mail Correspondence with Bowen	0.30	\$75.00
5/11/2016	E-mail Correspondence with Rogers	0.20	\$50.00
5/11/2016	E-mail Correspondence with Wood regarding Gilbert file production status	0.20	\$50.00
5/25/2016	E-mail Correspondence regarding [REDACTED]	0.50	\$125.00
6/02/2016	E-mail Correspondence with Rogers regarding [REDACTED]	0.20	\$50.00
6/03/2016	Telephone call with Wood and Emails regarding Gilbert	0.30	\$75.00
6/03/2016	E-mail Correspondence with Bowen	0.20	\$50.00
Total Fees			\$7,660.00

Expenses

<u>Start Date</u>	<u>Description</u>	<u>Charges</u>
9/30/2014	#3554 Clerk of Court Filing Fee - Motion to Amend	\$25.00
11/11/2014	#3585 Clerk of Court Filing Fee - Consent Order to Amend and Refer	\$25.00
11/12/2014	#3642 A. William Roberts - Deposition R. Sample (#213215)	\$79.47
2/23/2016	#3662 Beaufort County Master in Equity - Reference Fee	\$50.00
3/31/2016	#3982 Beaufort County Clerk of Court - Filing Fee Cancellation of Lis Pendens	\$1.00
4/20/2016	Federal Express to Beaufort Clerk of Court	\$23.14
Total Expenses		\$203.61

Total New Charges

\$7,863.61

Previous Balance

\$16,625.00

6/08/2014 Payment 1531
Payment from Kerr

Lady Beaufort, LLC,

\$-10,000.00

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8/01/2014	Write Off per AKE	Lady Beaufort, LLC	\$-6,625.00
Total Payments and Credits			<u>\$-16,625.00</u>
Balance Due			<u><u>\$7,863.61</u></u>

Staff Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Andrew K Epling	0.30	\$450.00
Michelle Nicole Endemarr	30.10	\$250.00

8

Andrew K Epling Jr LLC

46A State Street
 Charleston, SC 29401-
 Tel: 843-377-1871 Fax: 843-377-1310
 ake@epling-law.com

Invoice Submitted To:

James J Kerr
 AMGS, Inc.
 Post Office Box 1302
 John's Island, SC 29457

Invoice

Invoice Date: Feb 27, 2017
 Invoice Num: 1087
 Billing Through: Feb 27, 2017

In Reference To: Lady Beaufort (2086-001) - Managed by (AKE)

Professional Services

Date	Description	Employee	Hours	Amount
6/6/2016	Email with Perry re: Fender deposition	MNE	0.30	\$75.00
6/9/2016	Emails with Gilbert and Bowen	MNE	0.40	\$100.00
6/13/2016	Email with Bowen	MNE	0.20	\$50.00
6/14/2016	Email and call with Wood re: Gilbert's file and depo	MNE	0.40	\$100.00
6/20/2016	Call with client	MNE	0.20	\$50.00
6/22/2016	Email with client	MNE	0.20	\$50.00
6/27/2016	Review [REDACTED]	MNE	2.40	\$600.00
6/27/2016	Emails re: depo of Gilbert	MNE	0.50	\$125.00
6/28/2016	Review [REDACTED] and email with Rogers	MNE	2.00	\$500.00
6/28/2016	Email re Gilbert depo	MNE	0.20	\$50.00
6/28/2016	Review [REDACTED]	MNE	1.00	\$250.00
6/29/2016	Travel to and appear at depositions of Trumps and Rogers; conferences with client, witnesses, Bowen	MNE	6.50	\$1,625.00
6/30/2016	Review [REDACTED]	MNE	0.30	\$75.00
7/1/2016	Email re: location of depositions	MNE	0.30	\$75.00
7/1/2016	Email to Judge's clerk with update	MNE	0.30	\$75.00
7/5/2016	Email re: [REDACTED]	MNE	0.20	\$50.00
7/6/2016	Email with Wood re: [REDACTED] and set call	MNE	0.60	\$150.00
7/7/2016	Call with Wood and conf AKE	MNE	0.60	\$150.00
7/8/2016	Conference with AKE re: [REDACTED]	MNE	0.40	\$100.00
7/18/2016	Email with client and conference with AGG re: [REDACTED]	MNE	0.80	\$200.00
7/26/2016	Email with Bowen re: supplemental production	MNE	0.30	\$75.00
10/3/2016	Email with Judge's clerk re: dispositive motions/trial date	MNE	0.20	\$50.00
11/4/2016	Email correspondence with client [REDACTED]	MNE	0.30	\$75.00
11/16/2016	Email memo to AGG re: [REDACTED]	MNE	0.20	\$50.00
11/17/2016	Email re: [REDACTED]	MNE	0.20	\$50.00
11/18/2016	Email with Bowen	MNE	0.20	\$50.00
11/21/2016	Email with Bowen	MNE	0.20	\$50.00
12/6/2016	Email re: [REDACTED] research file; call with AGG and memo regarding [REDACTED]	MNE	1.00	\$250.00
12/14/2016	Prepare outline for deposition of Fender; call with Bowen	MNE	2.60	\$650.00
12/15/2016	Prepare exhibits for use in depo of Fender; conf AGG	MNE	1.80	\$450.00
12/16/2016	Travel to and appear at deposition of Fender; conf AKE	MNE	6.20	\$1,550.00
1/4/2017	Email with Judge's clerk re: trial date	MNE	0.30	\$75.00
1/5/2017	Email with Judge's clerk re: trial date	MNE	0.20	\$50.00

9

LAW OFFICES

MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*

1501 North Street P.O. Drawer 507~Beaufort, South Carolina 29901-0507
TELEPHONE 843-524-3373
FAX 843-524-1302

*ALSO MEMBER OF GA BAR

January 2, 2019

RECEIVED
JAN 04 2019
SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Lady Beaufort, LLC & Tideland Realty, Inc. v. Hird Island Investments, et al.
Case No.: 2014-CP-07-0052
Appellate Case No.: 2018-001969

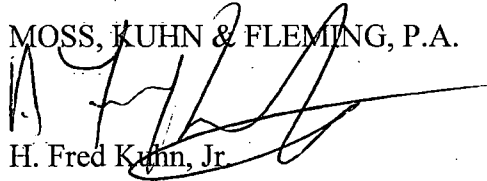
Dear Mrs. Kitchings:

Enclosed please find the original and one (1) copy of the Initial Brief of Appellants/Respondents Replying to Initial Brief of Respondents/Appellants and Designation of Matter to be Included in Record on Appeal together with a Certificate of Service. Please file the originals and return stamped copies to me in the enclosed self-addressed stamped envelope.

With kindest regards, I am

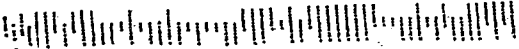
Very truly yours,

MOSS, KUHN & FLEMING, P.A.


H. Fred Kuhn, Jr.

HFKjr:sr
Enclosures

cc: Andrew K. Epting, Jr., Esquire (w/enclosure)
Jaan G. Rannik, Esquire (w/enclosures)



MOSS, KUHN & FLEMING
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HFK

Fender

To:

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JAN 04 2019

SC Court of Appeals

Honorable Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 Post Office Box 11629
 Columbia, South Carolina 29211

