

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM Horry COUNTY  
Court of Common Pleas

The Honorable Larry B. Hyman, Circuit Court Judge

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Case No. 2016-CP-26-1961  
Appellate Case No. 2018-000852

**RECEIVED**  
FEB 05 2019  
SC Court of Appeals

S. Scott Porter, Individually and as Co-Trustee of the Stanley  
S. Scott Porter Trust UA dated January 2, 1991, a member of  
Peaceful Lane MHP, LLC .....Respondent,

v.

Kenneth Hucks, Individually and as a member and formerly  
designated manager of Peaceful Lane MHP, LLC .....Appellant.

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

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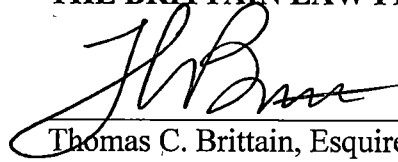
Respondent S. Scott Porter, Individually and as Co-Trustee of the Stanley S. Scott Porter Trust UA dated January 2, 1991, a member of Peaceful Lane MHP, LLC hereby designates the following to be included in the Record on Appeal:

1. Defendant's Motion for Summary Judgment dated October 24, 2016
2. Plaintiff's Memorandum in Opposition to Defendant's Motion for Summary Judgment dated February 17, 2017

3. Plaintiff's Supplemental Memorandum in Opposition to Defendant's Motion for Summary Judgment dated February 24, 2017.
4. Form 4 Order Denying Defendant's Motion for Summary Judgment dated February 27, 2017
5. Affidavit of Plaintiff Scott Porter dated February 16, 2017
6. Demand Promissory Note between Plaintiff and Defendant dated May 6, 2011
7. Pledge and Amendment Agreement between Plaintiff and Defendant dated May 6, 2011
8. Plaintiff's Trial Exhibits
9. Defendant's Trial Exhibits
10. Jury Instructions

Respectfully submitted,

**THE BRITAIN LAW FIRM, P.A.**



Thomas C. Brittain, Esquire  
Mary Madison Brittain Langway, Esquire  
4614 Oleander Drive  
Myrtle Beach, SC 29577  
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**ATTORNEYS FOR RESPONDENT**

February 4, 2019  
Myrtle Beach, South Carolina

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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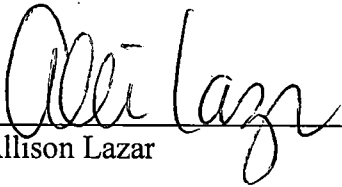
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PROOF OF SERVICE


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I, Allison Lazar, do hereby certify that I am an employee of THE BRITAIN LAW FIRM, P.A., attorneys for the Respondent in the above-entitled action, and that I have this 4<sup>th</sup> day of February 2019, caused to be served upon the following parties the **Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal** by depositing a copy of same in the United States Mail, with sufficient first class postage affixed thereto, addressed as follows:

Richard R. Gleissner  
Gleissner Law Firm, LLC  
1237 Gadsden Street, Suite 200A  
Columbia, SC 29201

  
Allison Lazar

**SWORN AND SUBSCRIBED** before me  
this 4<sup>th</sup> day of February, 2019.

  
NOTARY PUBLIC FOR SOUTH CAROLINA  
My Commission Expires: 5/2/20

THE BRITTAIN LAW FIRM, P.A.

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4614 OLEANDER DRIVE  
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THOMAS C. BRITTAIN  
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[www.brittainlawfirm.com](http://www.brittainlawfirm.com)

February 4, 2019

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

**RECEIVED**

FEB 05 2019

SC Court of Appeals

Re: S. Scott Porter v. Kenneth Hucks  
Appellate Case No. 2018-000852

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal together with the Proof of Service in the above-referenced matter.

Yours truly,

THE BRITTAIN LAW FIRM, P.A.



Thomas C. Brittain  
TCB/all

cc: Richard R. Gleissner, Esq.

press Package US Airbill

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Phone 843 449-8562

THE BRITTAIN LAW FIRM PA

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Second business morning. Saturday Delivery NOT available.

FedEx 2Day  
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SC Court of Appeals

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