

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Larry B. Hyman, Circuit Court Judge

---

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

**RECEIVED**  
FEB 19 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.

---

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

---

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

Pursuant to Rule 209(c), SCACR, the undersigned counsel for the Respondent hereby certifies this Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,

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



---

Thomas C. Brittain, Esquire  
Mary Madison Brittain Langway, Esquire  
4614 Oleander Drive  
Myrtle Beach, SC 29577  
843-449-8562 Telephone  
843-497-6124 Facsimile  
**ATTORNEYS FOR RESPONDENT**

February 15, 2019  
Myrtle Beach, South Carolina

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Larry B. Hyman, Circuit Court Judge

---

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

**RECEIVED**  
FEB 19 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.

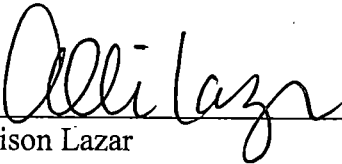
---

PROOF OF SERVICE

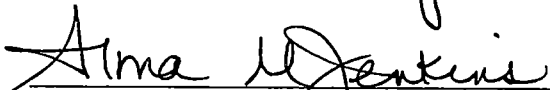
---

I, Allison Lazar, do hereby certify that I am an employee of THE BRITTAIN LAW FIRM, P.A., attorneys for the Respondent in the above-entitled action, and that I have this 15<sup>th</sup> day of February 2019, caused to be served upon the following parties the **Respondent's revised 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 15<sup>th</sup> day of February, 2019.

  
**NOTARY PUBLIC FOR SOUTH CAROLINA**  
My Commission Expires: 5/2/2021

THE BRITTAIN LAW FIRM, P.A.

ATTORNEYS AT LAW  
4614 OLEANDER DRIVE  
MYRTLE BEACH, SOUTH CAROLINA 29577

THOMAS C. BRITTAIN  
MARY MADISON BRITTAIN LANGWAY  
A. PRESTON BRITTAIN  
T. CASE BRITTAIN, JR.

843-449-8562  
FAX 843-497-6124  
[www.brittainlawfirm.com](http://www.brittainlawfirm.com)

February 15, 2019

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

**RECEIVED**  
FEB 19 2019  
SC Court of Appeals

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

Dear Ms. Kitchings:

Pursuant to your letter dated February 13, 2019 in the above-referenced matter, enclosed please find the original and one (1) copy of Respondent's Designation of Matter to be Included in the Record on Appeal, with the necessary correction, together with the Proof of Service.

Yours truly,

THE BRITTAIN LAW FIRM, P.A.



Thomas C. Brittain  
TCB/all

cc: Richard R. Gleissner, Esq.



THE BRITAIN LAW FIRM, P.A.  
ATTORNEYS AT LAW  
4614 OLEANDER DRIVE  
MYRTLE BEACH, SOUTH CAROLINA 29577

---

TO:

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

**RECEIVED**  
FEB 19 2019  
SC Court of Appeals