

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM AIKEN COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE DOYET A. EARLY, III  
CIRCUIT COURT JUDGE

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APPELLATE CASE NO. 2019-000120  
CIVIL ACTION NO. 2018-CP-02-020606

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RECEIVED  
APR 19 2019  
SC Court of Appeals

Gary Griffin and Rachel Griffin.,

APPELLANTS,

versus

Shannon Rollings, d/b/a  
Shannon Rollings Real Estate, LLC,

RESPONDENT.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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Shannon Rollings, d/b/a Shannon Rollings Real Estate, LLC, Respondent in the above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed August 30, 2018;
2. Answer, filed September 11, 2018;
3. Defendant's Notice of Motion and Motion for Summary Judgment, filed November 5, 2018;
4. Defendant's Memorandum in Support of Motion for Summary Judgment with attached exhibits, filed December 3, 2018;
  - A: Real Estate Purchase Agreement;
  - B: Affidavit of Shannon Rollings;
  - C: Complaint in *Griffin v. Fidelity Bank et al.*, 2017-CP-02-01437;
  - D: Warranty Deed;

- E: Deed of Easement;
- F: Disclosure Statement;
- G: Order in *Griffin v. Turner*, 2016-RCCV-141 (Georgia); and
- H: Deposition Excerpts of Richard W. Taylor

5. Supplemental Affidavit of Shannon Rollings with attached exhibits, filed December 6, 2018:

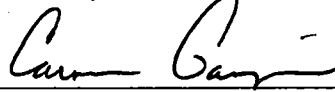
- A: Updated Disclosure Statement;
- B: Initial Disclosure Statement;
- C: Jan. 15, 2015 e-mail from Witmer to Taylor;
- D: Jan. 15, 2015 e-mail from Sutton to Taylor and Griffin; and
- E: Jan. 14, 2015 e-mail from Sutton to Taylor and Griffin

6. Entire Transcript of Summary Judgment Hearing before The Honorable Doyet A. Early, III heard on December 11, 2018; and

7. Order Granting Summary Judgment, filed January 10, 2019.

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

Respectfully submitted,



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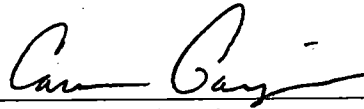
David A. Anderson  
Carmen V. Ganjehsani  
RICHARDSON, PLOWDEN & ROBINSON, PA  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENT  
SHANNON ROLLINGS, D/B/A  
SHANNON ROLLINGS REAL ESTATE, LLC**

April 17, 2019.

**CERTIFICATE OF SERVICE**

I, the undersigned, attorney for Respondent, Shannon Rollings, d/b/a Shannon Rollings Real Estate, LLC, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated April 17, 2019, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Calvin A. Rouse  
P.O. Box 3945  
Augusta, GA 30914-3945  
**Attorney for Appellant**



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Carmen V. Ganjehsani  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENT  
SHANNON ROLLINGS, D/B/A  
SHANNON ROLLINGS REAL ESTATE, LLC**

Dated: April 17, 2019.

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Reply to: **Carmen V. Ganjehsani**  
Direct Dial: 803-253-8692  
cganjehsani@richardsonplowden.com

April 17, 2019

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

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**APR 19 2019**

**SC Court of Appeals**

**Re: Gary Griffin v. Shannon Rollings**  
**Appellate Case No.: 2019-000120**  
**RPR File No.: 101-2833**

Dear Ms. Kitchings:

Enclosed for filing are the original Initial Respondent's Brief of Shannon Rollings d/b/a Shannon Rollings Real Estate, LLC and the Respondent's Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service.

By copy of this letter, we are this day serving a copy of our Initial Brief and Designations on opposing counsel.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,



Carmen V. Ganjehsani

CVG  
Encs.

cc: Calvin A. Rouse, Esq.  
David A. Anderson, Esq. (FYI)

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RICHARDSON  
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ATTORNEYS AT LAW

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