

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable L. Casey Manning
Trial Court Case No. 2016-CP-40-04718

Appellate Case No. 2018-001845

RECEIVED

APR 26 2019

SC Court of Appeals

WFG National Title Insurance Company,

Respondent,

v.

DataQuick Lending Solutions, Inc. and DataQuick Lending Solutions, LLC,

Appellants.

**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL
AND OBJECTION TO APPELLANT'S DESIGNATION OF MATTER**

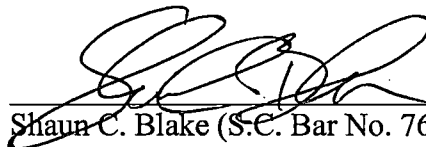
WFG hereby objects to the inclusion of item 22 designated by the Appellants, as it is prohibited by Rule 210(c), SCACR ("The Record shall not, however, include matter which was not presented to the lower court or tribunal."). WFG National Title Insurance Company ("WFG") designates the following to be included in the Record on Appeal:

1. Filed copy of the Summons and Complaint in 2016-CP-40-04718, together with filed Civil Action Coversheet and Exhibit A.
2. Filed copy of the Affidavit of Service for DataQuick Lending Solutions, LLC dated August 10, 2016 and filed September 12, 2016.
3. Filed copy of the Affidavit of Service for DataQuick Lending Solutions, Inc. dated August 11, 2016 and filed August 19, 2016.
4. Proposed Order of Entry of Default, together with Order Coversheet dated October 6, 2016 and Certificate of Service dated October 10, 2016.
5. Filed Affidavit of Default signed by Drew Walker, together with Certificate of Service dated October 10, 2016.
6. Filed Order of Entry of Default, together with Form 4, motion coversheet, and Certificate of Service

7. Filed Notice of Motion and Motion for Default Judgment with Attorney's Fees, together with Exhibit, Motion Coversheet, Proposed Order, Proposed Form 4, and Certificate of Service
8. Filed Affidavit as to Attorney's Fees by Drew Walker dated September 15, 2017
9. Filed Affidavit of Amount Due signed by Jeffrey Dondanville on August 30, 2017
10. Filed Order granting Motion for Default Judgment, together with Filed Form 4
11. Filed Certificate of Service together with Letter to Hon. Jeanette W. McBride dated September 27, 2017.
12. Filed Motion for New Trial, to Alter or Amend Judgment, and for Relief from Judgment, together with coversheet and Exhibit A, the Affidavit of Michael LaGatta
13. Letter to Casey Manning from William M. Wilson dated October 16, 2017
14. Filed Memorandum in support of Defendants' Motion for New Trial, to Alter or Amend Judgment, and for Relief from Judgment
15. Filed Affidavit of Adam Fliss dated July 16, 2018
16. Filed Memorandum in Opposition to Defendants' Motion for New Trial, to Alter or Amend Judgment, and for Relief from Judgment
17. Filed Affidavit as to Attorneys Fees of Drew Walker dated August 21, 2018
18. Transcript of hearing on Motion for New Trial, to Alter or Amend Judgment, and for Relief from Judgment
19. Email from Drew Walker to Judge Manning dated August 31, 2018 together with attached proposed order
20. Email from William M. Wilson, III to Judge Manning dated August 31, 2018 together with two (2) attached proposed orders
21. Filed Order Denying Motion for New Trial, to Alter or Amend Judgment, and for Relief from Judgment
22. Copy of the Notice of Appeal filed with Richland County

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

Respectfully submitted,



Shaun C. Blake (S.C. Bar No. 76349)
Drew B. Walker (S.C. Bar No. 78271)
ROGERS LEWIS JACKSON MANN & QUINN, LLC
PO Box 11803
Columbia, SC 29211
P: 803-256-1268
F: 803-252-3653
sblake@rogerslewis.com
dwalker@rogerslewis.com

ATTORNEYS FOR RESPONDENT
WFG NATIONAL TITLE INSURANCE COMPANY

April 26, 2019

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PROOF OF SERVICE

The undersigned certifies that the foregoing **INITIAL BRIEF OF RESPONDENT** and the **RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served together upon all counsel of record for the Appellants by causing a copy of the same to be deposited in the United States First Class mail, postage prepaid, addressed as follows:

William M. Wilson, III
Wyche, P.A.
Post Office Box 728
Greenville, SC 29062-0728


Shaun C. Blake (S.C. Bar No. 76349)

April 26, 2019

ROGERS LEWIS

ATTORNEYS AT LAW

Pamela Baker - Paralegal
pbaker@rogerslewis.com

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SC Court of Appeals

Via Hand Delivery

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

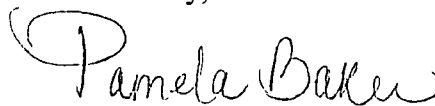
RE: *WFG National Title Insurance Company v. DataQuick Lending Solutions et al.*
Appellate Case No. 2018-001845

Dear Ms. Kitchings:

Enclosed please find an original and one copy of Initial Brief of Respondent, Designation of Matter and Certificate of Service for same. Please file the original and return one clocked copy back to our office via the courier.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,



Pamela Baker
Paralegal for Drew Walker

Enclosures

cc: William M. Wilson, III
PO Box 728
Greenville, SC 29602