

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS

RECEIVED

MAY 08 2019

The Honorable Dale E. Van Slambrook, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2018-001993

Ronald E. Price and Diana R. B. Price Respondents

v.

Belinda Fox and Gerry Fox. Appellants

**SUPPLEMENTAL DESIGNATION OF MATTER ON APPEAL
TO BE INCLUDED IN RECORD**

Petitioners propose the following to be included in the Record on Appeal:

1. Order After Trial on the Merits, 04-CP-08-1855, June 29, 2018
2. Order Denying Foxes Motions For JNOV, New Trial and To Alter Or Amend The Final Order After Trial On The Merits, 04-CP-08-1855, October 9, 2018
3. Amended Order Denying Summary Judgment for Gerry Fox, 2004-CP-08-1855, October 23, 2017

4. Order Denying Defendant Gerry Fox's Motion to Reconsider, 2004-CP-08-1855, November 28, 2017
5. Transcript of Record, September 24, 2018
6. Transcript of Trial Proceedings, May 3-4, 2018 and all Exhibits
7. Complaint, 2007-CP-08-458, February 22, 2007
8. Motion to Amend Complaint, 2004-CP-08-1855, November 30, 2005
9. Consent Order, 2004-CP-08-1855, February 7, 2006
10. Summons and Complaint, 2004-CP-08-1150, August 23, 2004
11. Amended Summons and Amended Complaint, 2004-CP-08-1150, October 20, 2005
12. Second Amended and Supplemental Complaint, 2004-CP-08-1855, September 30, 2015
13. Order Granting Plaintiff's Motion to Amend and File Supplemental Complaint, 2004-CP-08-1855, September 8, 2015
14. Motion to Dismiss and Summary Judgment, 2004-CP-08-1855, January 25, 2016
15. Order for Partial Summary Judgment as to Defendants Troy and Sarah Winn, 2004-CP-08-1855, May 6, 2016
16. Motion for Summary Judgment, 2004-CP-08-1855, May 9, 2017
17. Stipulation of Dismissal, 2007-CP-08-00458, September 9, 2015
18. Motions For JNOV, New Trial and To Alter Or Amend The Final Order After Trial On The Merits, 2004-CP-08-1855, July 19, 2018
19. Motion for Respondents to Elect their Remedy, 2004-CP-08-1855, September 27, 2018

20. Plaintiffs' Election of Remedy, 2004-CP-08-1855, February 15, 2019

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

May 6, 2019



Paul B. Ferrara, III
S.C. Bar No. 70511
2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511
Attorney for Petitioners-Appellants

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS

Dale Van Slambrook, Circuit Court Judge

CASE NO. 2004-CP-08-1855
APPELLATE CASE NO. 2018-001993

RECEIVED
MAY 08 2019
SC Court of Appeals

Ronald E. Price and Diana R.B. Price,

Respondents,

v.

Belinda Fox and Gerry Fox,

Petitioners.

PROOF OF SERVICE

I, the undersigned counsel, hereby certify that I have served the Reply Brief of Petitioner and Supplemental Designation of Matter on Appeal by depositing a copy of the same in the United States Mail, postage prepaid, on May 6, 2019, addressed to, James Derrick Jackson, Esquire, and Tobias G. Ward, Jr. P.A., P.O. Box 50124 Columbia, SC 29250.

Respectfully submitted this 6th day of May 2019.



Paul B. Ferrara, III
SC Bar No. 70511
2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511 / (843) 569-5411 fax
paul@ferraralawfirm.net
Attorney for Appellants

Ferrara Law Firm, PLLC

2300 Otranto Road
North Charleston, SC 29406
(843) 569-5511 / Fax (843) 569-5411

RECEIVED

MAY 08 2019

SC Court of Appeals

Paul B. Ferrara, III*
Janel K. Ferrara*
Alex S. Fadoul

*(also Admitted in N.C.)

May 6, 2019

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

Re: Ronald E. Price and Diana R.B. Price vs. Belinda Fox and Gerry Fox
Common Pleas Case No.: 2018-001993
Our File No.: 15-614

Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of Reply of Petitioners and Supplemental Designation of Matter. Also enclosed is a proof of service regarding the same.

Please file the originals and return a clocked copy to our office in the self-addressed, stamped envelope which is enclosed.

Sincerely,

FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III

Enclosures

cc: J. Derrick Jackson
Tobias G. Ward, Jr. PA
Post Office Box 50124
Columbia, SC 29250
Attorney for Respondents

1

US POSTAGE & FEES PAID
10 OZ FIRST-CLASS MAIL FLATS RATE

062S0011607226
FROM 29406

RETAIL



stamps
endicia
05/06/2019

USPS FIRST CLASS MAIL®

Paul B. Ferrara, III
Ferrara Law Firm, PLLC
2300 Otranto Road
North Charleston SC 29406

B012

SHIP TO: The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia SC 29211-1629



RECEIVED

MAY 08 2019

SC Court of Appeals