

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Honorable Brian M. Gibbons, Circuit Judge

RECEIVED

MAY 06 2019

SC Court of Appeals

Case No: 2017-CP-29-01248
Appellate Case No.: 2018-002272

Desa Ballard, as successor trustee of the Trust of Chris Combis Appellant,

v.

Diane Combis, Chris A. Combis, Redding Jones PLLC,
Simon John O'Brien, and Kent D. Jones Defendants.

Of whom Redding Jones PLLC, Simon John O'Brien,
and Kent D. Jones are..... Respondents.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondents Redding Jones PLLC, Simon John O'Brien, and Kent D. Jones propose the following be included in the Record on Appeal:

1. Complaint
2. Motion to Dismiss on behalf of Defendants Redding Jones PLLC, Simon John O'Brien, and Kent D. Jones
3. Brief in Support of Motion to Dismiss by Defendants Redding Jones PLLC, Simon John O'Brien, and Kent D. Jones
4. Jones Affidavit
5. O'Brien Affidavit
6. Memorandum in Opposition to Motion to Dismiss
7. Transcript of October 29, 2018, hearing before the Honorable Brian M. Gibbons

8. Order Granting Motion to Dismiss of the Honorable Brian M. Gibbons dated November 6, 2018
9. Order Denying Motion to Reconsider of the Honorable Brian M. Gibbons dated December 3, 2018

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

May 3, 2019.



Edward B. Davis (S.C. State Bar No. 16713)
Attorney for Respondents

OF COUNSEL:
BELL, DAVIS & PITT, P.A.
227 West Trade Street, Suite 1800
Charlotte, NC 28202
Telephone: 704/227-0400
Facsimile: 704/227-0178

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA
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Desa Ballard, as successor
Trustee of the Trust of
Chris Combis,

Appellant,

v.

Diane Combis, Chris A. Combis,
Redding Jones PLLC, Simon John O'Brien,
And Kent D. Jones,

Defendants.

Of whom

Redding Jones PLLC, Simon John O'Brien,
And Kent D. Jones are

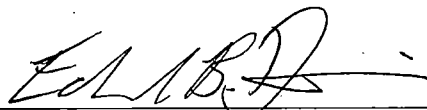
Respondents.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal on Appellant Desa Ballard, as successor trustee of the Trust of Chris Combis, by depositing a copy of the same in the United States Mail, postage prepaid on May 3, 2019, addressed to her attorney of record, Douglas N. Truslow, Esquire, at P.O. Box 1465, Columbia, South Carolina 29202, on Defendant Diane Combis at 8707 Lake Challis Lane,

Charlotte, North Carolina 28226, and on Defendant Chris A. Combis at 2310 North Brevard Street,
Charlotte, North Carolina 28206.

This the 3rd day of May 2019.



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28202-1697

May 3, 2019

Via FedEx

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

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SC Court of Appeals

Re: *Desa Ballard v. Diane Combis, et al.*
Appellate Case Number: 2018-002272

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the *Initial Brief of Respondents*, the *Designation of Matter to be Included in the Record on Appeal*, and the *Proof of Service* for filing in the above referenced case. Please return file-stamped copies to me in the self-addressed, stamped envelope included herein.

By copy of this letter, I am serving the same on opposing counsel, as well as Diane Combis and Chris A. Combis as they are appearing pro se.

Sincerely,

BELL, DAVIS & PITT, P.A.

Edward B. Davis

EBD/src
Enclosure(s)

Cc: Douglas N. Truslow, Esq.
Diane Combis
Chris A. Combis

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SUSANNAH COOK

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CHARLOTTE, NC 28202
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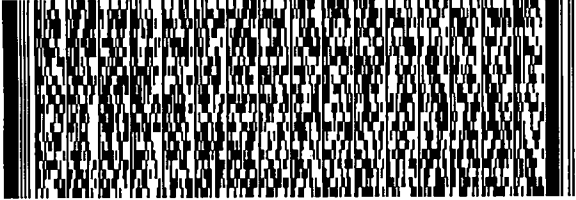
BILL SENDER

TO **HONORABLE JENNY ABBOTT KITCHINGS**
CLERK OF SC COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

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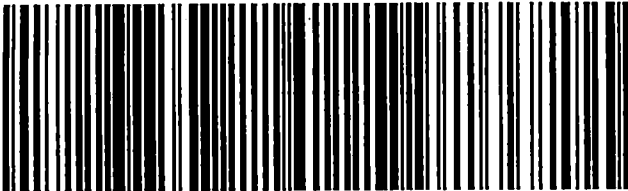
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SC Court of Appeals