

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge, Second Judicial Circuit

Case No. 2018-CP-02-00675

**RECEIVED**  
JUN 26 2019  
SC Court of Appeals

Ex parte: Daniel Geitner, .....Appellant,

In re: Kelly Sims, .....Respondent,

v.

Sharon Enteen Prusso a/k/a Sharon Enteen  
and Falcon Ridge, Inc., ..... Defendants.

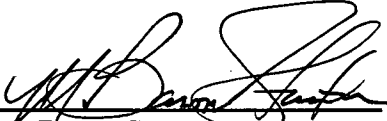
**RESPONDENT’S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD  
ON APPEAL**

1. (If not already intended) Exhibit to Subpoena for Out of State Deposition, which includes Exhibit 1 and Subexhibit a.
2. Plaintiff’s Motion to Compel Non-party Daniel Geitner to Comply with Subpoena for Deposition and Supporting Brief, with Exhibits 1-5 (“Motion to Compel”).
3. Order Granting Plaintiff’s Motion to Compel Nonparty Daniel Geitner to Comply with Subpoena and South Carolina Rules for Deposition (“12/5/18 Order”).
4. (If not already intended) Attachment to Affidavit of M. Baron Stanton Re Own Fees and Lead Counsel’s Fees, and the Combined Total, filed December 14, 2018.


5. Plaintiff's Reply to Non-Party Daniel Geitner's Memorandum in Opposition to Award of Attorneys' Fees ("Reply Brief").

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

Dated: June 25, 2019.

  
M. Baron Stanton  
S.C. Bar No. 7970

**STANTON LAW OFFICES, P.A.**  
1728 Main Street  
P.O. Box 245  
Columbia, S.C. 29202  
803.929.1484  
[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)

  
Cary Ichter  
Ga. Bar No. 382515  
Pro Hac Vice  
**ICHTER DAVIS LLC**  
3340 Peachtree Road NE  
Suite 1530  
Atlanta, Georgia 30326  
404.869.7600  
[cichter@ichterdavis.com](mailto:cichter@ichterdavis.com)

*Attorneys for Respondent Kelly Sims*

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JUN 26 2019  
SC Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge, Second Judicial Circuit

Case No. 2018-CP-02-00675

Ex parte: Daniel Geitner, .....Appellant,

In re: Kelly Sims, .....Respondent,

v.

Sharon Enteen Prusso a/k/a Sharon Enteen  
and Falcon Ridge, Inc., ..... Defendants.

**PROOF OF SERVICE**

I hereby certify that, on this date, I served Appellant's counsel with copies of Respondent's Brief and Respondent's Designation of Matter to be Included in the Record on Appeal by depositing same in the U.S. Mail with sufficient postage attached to ensure delivery as follows:

Karl S. Bowers, Jr.  
Bowers Law Office, LLC  
P.O. Box 50549  
Columbia, South Carolina 29250

Dated: June 25, 2019.

  
M. Baron Stanton

STANTON LAW OFFICES, P.A.

POST OFFICE BOX 245  
COLUMBIA, SOUTH CAROLINA 29202

1728 MAIN STREET  
COLUMBIA, SOUTH CAROLINA 29201

July 25, 2019

TELEPHONE 803-929-1484  
TELECOPIER/FAX 803-929-0534

M. BARON STANTON  
ATTORNEY AT LAW

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

Re: Ex parte: Daniel Geitner, in re: **Kelly Sims** v. Sharon Enteen-Prusso, et al.,  
Appeal from Aiken County Court of Common Pleas, Case No. 2018-CP-02-  
00675  
Appellate Case No. 2019-000288

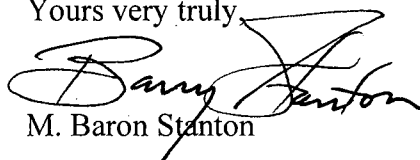
Dear Ms. Kitchings:

We enclose the following:

1. Initial Respondent's Brief;
2. Respondent's Designation of Matter to Be Included in the Record; and
3. Proof of Service of (1) and (2) above,

With kind regards,

Yours very truly,

  
M. Baron Stanton

MBS:dmy  
Enclosure  
cc w/encl.: Karl S. Bowers, Jr., Esquire

cc w/encl. (e-mail prototype only): Cary Ichter, Esquire  
and W. Daniel Davis, Esquire

**RECEIVED**  
JUN 26 2019  
SC Court of Appeals

STANTON LAW OFFICES, P.A.

POST OFFICE BOX 245  
COLUMBIA, SOUTH CAROLINA 29202

**RECEIVED**

**JUN 26 2019**

**SC Court of Appeals**

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

