

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY COURT OF COMMON PLEAS

Benjamin H. Culbertson, Circuit Court Judge

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Appellate Case No. 2019-000413

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JUL 22 2019

SC Court of Appeals

Karl & Terri Hager, Robert Singleton & Teresa Singleton,  
Jay & Susan Welborn, Erik Arnold, and Bowers Caravelle  
LLC, derivatively and on behalf of Caravelle Resort  
Association, Inc. and on behalf of themselves and those  
similarly situated,..... Appellants,

v.

McCabe, Trotter & Beverly, PC and Gold Crown  
Management Company, Inc.,

Of Which McCabe, Trotter & Beverly, PC is the..... Respondent.

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

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The Respondent identifies the following items to be included in the Record on Appeal pursuant to Rule 209, SCACR:

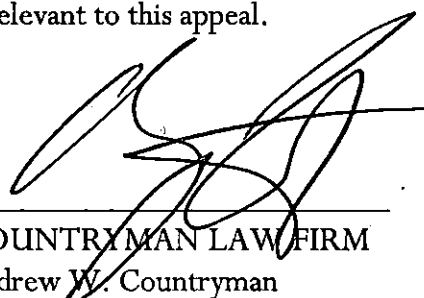
1. Summons and Complaint; with exhibits (filed May 14, 2018);
2. Motion to Dismiss of McCabe, Trotter & Beverly, P.C. ("MTB") (filed Jun. 6, 2018);
3. Answer of MTB (filed Jun. 6, 2018);
4. Supplement to Motion to Dismiss of MTB (filed Jun. 11, 2018);
5. Amended Summons and Complaint; with exhibits (filed Jun. 18, 2018);
6. Form Order on Motion to Dismiss (filed Jun. 19, 2018);

7. Motion to Dismiss Amended Complaint of MTB (filed Jun. 20, 2018);
8. Answer to Amended Complaint (filed Jun. 20, 2018);
9. Plaintiffs' Memo in Opposition to MTB's Motion to Dismiss (filed Jul. 28, 2018);
10. Transcript of July 31, 2018, hearing;
11. Form Order granting MTB's Motion to Dismiss (filed Aug. 1, 2018);
12. Plaintiffs' Motion to Reconsider (filed Aug. 9, 2018);
13. Transcript of January 22, 2019, hearing;
14. Form Order on January 22, 2019, motions;
15. January 28, 2019, email from Andrew Countryman to Judge Culbertson;
16. February 22, 2019, letter from Andrew Countryman to Judge Culbertson;
17. Formal Order granting MTB's Motion to Dismiss (filed Mar. 6, 2019).

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

July 18, 2019.

ROGERS, TOWNSEND & THOMAS, P.C.  
Robert P. Wood  
1221 Main St., 14<sup>th</sup> Floor  
P.O. Box 100200  
Columbia, SC 29202-3200  
803-771-7900  
**Attorney for Respondent**



COUNTRYMAN LAW FIRM  
Andrew W. Countryman  
State Bar No.: 72700  
321 Wingo Way, Ste. 102  
Mt. Pleasant, SC 29464  
843-253-4477  
**Attorney for Respondent**

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Management

Of Which McCabe, Trotter & Beverly, PC is  
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**PROOF OF SERVICE**


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I certify that I have served Respondent's Designation of Matter to be Included in the Record on Appeal and Initial Brief on counsel for all parties in this case by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Brian C. Gambrell  
810 Dutch Square Blvd., Ste. 112  
Columbia, SC 29210  
**Counsel for Appellants**

Dominic A. Starr  
McAngus Goudelock & Courie, LLC  
P.O. Box 1349  
Myrtle Beach, SC 29578  
**Counsel for Gold Crown Management  
Company, Inc.**

This 16<sup>th</sup> day of July, 2019



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COUNTRYMAN LAW FIRM  
Andrew W. Countryman  
321 Wingo Way, Ste. 102  
Mt. Pleasant, SC 29464  
**Attorney for Respondent**

# COUNTRYMAN LAW FIRM

Andrew W. Countryman  
321 Wingo Way, Suite 102  
Mount Pleasant, South Carolina 29464  
\*Certified S.C. Circuit Court Mediator

Litigation ♦ Mediation

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843-253-4477 office  
844-644-3165 fax

July 18, 2019

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

RECEIVED  
JUL 22 2019  
SC Court of Appeals

Re: *Hager v. McCabe, Trotter & Beverly, P.C.*  
Appellate Case No. 2019-000413  
CLF File: 000006 – 000051

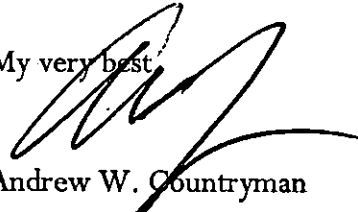
Dear Jenny:

I represent the Respondent, McCabe, Trotter & Beverly, P.C. ("MTB"), in this case. I enclose the following:

1. Respondent's Initial Brief;
2. Respondent's Designation of Matter; and
3. Proof of Service.

Please file the enclosures. By copy of this letter, I serve the lawyers for the other parties to this case with them. Thanks for your assistance, and don't hesitate to let me know if you have questions or need to discuss.

My very best,

  
Andrew W. Countryman

AWC/sgc  
Enclosures  
Cc: Brian Gambrell, Dominic Starr

