

**THE STATE OF SOUTH CAROLINA**  
In the Court of Appeals

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**APPEAL FROM Charleston COUNTY**  
Court of Common Pleas for the Ninth Circuit

The Honorable Bentley Price, Circuit Court Judge

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**Case No.: 2019-CP-10-00178**

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**RECEIVED**  
JUL 24 2019  
SC Court of Appeals

J. DANIEL MAHONEY..... Plaintiff / Respondent,

v.

THE MUHLER COMPANY, INC. and HENRY M. HAY, III.....  
Defendants/Appellants.

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

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Appellants assert the following documents should be included in the Record on

Appeal:

1. May 17, 2019 Order (2018-CP-05077)
2. June 5, 2019 Order (2018-CP-10-05077)
3. June 14, 2019 Order (2018-CP-10-05077)
4. June 24, 2019 Order (2019-CP-10-00178)
5. December 17, 2018 Motion to Compel (2018-CP-10-05077)
6. February 15, 2019 Motion to Compel (2019-CP-10-000178)
7. June 5, 2019 Objections to Plaintiff’s Proposed Order

8. June 5, 2019 Affidavit of Henry Hay
9. Article XIII to the Bylaws of The Muhler Company, Inc.

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

Respectfully Submitted by:

**ANDREW K. EPTING, JR., LLC**



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Andrew K. Epting, Jr.

Jaan G. Rannik

46A State Street, Charleston, SC 29401

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[ake@epting-law.com](mailto:ake@epting-law.com);

[jgr@epting-law.com](mailto:jgr@epting-law.com)

*ATTORNEYS FOR APPELLANTS*

Dated this 22<sup>nd</sup> day of July, 2019  
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA  
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J. DANIEL MAHONEY,..... Plaintiff / Respondent,

v.

THE MUHLER COMPANY, INC. and HENRY M. HAY, III,..... Defendants/Appellants.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal, Appellants' Initial Brief, Appellants' Designation of Matter to be Included in the Record on Appeal on opposing counsel by depositing a copy in the United States Mail, Postage prepaid, on July 22, 2019, addressed to Respondent's attorneys of record as follows:

Clay McCullough, Esq.  
359 King Street, # 200  
Charleston, SC 29401  
[clay@mklawsc.com](mailto:clay@mklawsc.com)

ANDREW K. EPTING, JR., LLC

By 

Angela Gross  
Legal Assistant to  
Andrew K. Epting, Jr.  
Jaan G. Rannik  
46A State Street, Charleston, SC 29401  
Phone: 843-377-1871; Fax: 843-377-1310

# ANDREW K. EPTING, JR., LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

July 22, 2019

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

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JUL 24 2019  
SC Court of Appeals

RE: *J. Daniel Mahoney v. The Muhler Company, Inc. and Henry M. Hay, III*  
Case No.: 2019-CP-10-00178

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the following:

1. Notice of Appeal;
2. Initial Brief of Appellants;
3. Designation of Matter to be Included in the Record on Appeal; and
4. Proof of Service;

I also enclose the \$250.00 filing fee. Transcripts were ordered on June 3rd, but have not yet been delivered.

Please file the originals and return the file-stamped copies to me in the self-addressed, stamped envelope provided.

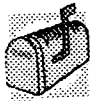
With kind regards,

ANDREW K. EPTING, JR., LLC

Angela Gross  
Legal Assistant to Jaan G. Rannik  
/agg

Enclosures – as stated

cc: Clay McCullough, Esquire (w/enc.)  
The Julie Armstrong (w/enc.)



ANGELA GROSS  
 46A STATE ST  
 CHARLESTON, SC 29401

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The Honorable Jenny Abbott Kitchings  
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 Columbia SC 29201-3769

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