

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Mark J. Hayes, II, Circuit Court Judge

Circuit Court Case No. 2015-CP-07-02047

Appellate Case No. 2019-000200

RECEIVED
OCT 18 2019
SC Court of Appeals

James R. Brady,

Respondent,

v.

Hilton Head Homes at Allenwood, LLC;
Village Square Development Company, LLC;
Lancaster Redevelopment Corp.; and Gary L.
Grossman,

Appellants.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal:

1. Order Granting Summary Judgment, March 1, 2019;
2. Motion for Summary Judgment as to Counterclaims, January 8, 2019;
3. Memo in Support of Motion for Summary Judgment, including Exhibits, February 4, 2019;
4. Affidavit of James Rod Brady, including Exhibits, February 4, 2019;
5. Summons and Complaint, June 5, 2009;
6. Summons and Complaint, August 15, 2015;
7. Answer and Counterclaim, September 14, 2015;
8. Reply to Counterclaim, July 27, 2015;
9. Transcript of Ginger Griffith, December 19, 2018;

10. Transcript of Ginger Griffith, December 20, 2018;
11. Letter from Gary Grossman to Rod Brady, February 4, 2004; and
12. Letter from Ginger Griffith to Rod Brady, September 13, 2007.

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

CAPELL THOMSON, LLC



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**Attorneys for Respondent James
R. Brady**

October 17, 2019
Charleston, South Carolina

Charles W. Thomson | Charleston
CThomson@CapellThomson.com

October 17, 2019

Via FedEx Overnight

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

Re: **Brady v. Hilton Head Homes at Allenwood, LLC, et al.**
Appellate Case No. 2019-000200

Dear Ms. Kitchings:

Enclosed for filing in the above case are as follows:

- 1) Original and one copy of Initial Brief of Respondent;
- 2) Original and one copy of Respondent's Designation of Matter to be Included in the Record on Appeal; and
- 3) Original and one copy of Proof of Service of the above.

Please file all three originals and return clocked copies of each to me in the self-addressed, stamped return envelope also enclosed. Thank you for your attention to this matter.

Sincerely yours,

Capell Thomson, LLC



Charles W. Thomson

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Enclosures
CWT/cgb
cc: G. Hamlin O'Kelley, Counsel for Appellants

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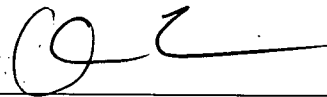
Hilton Head Homes at Allenwood, LLC; Village
Square Development Company, LLC; Lancaster
Redevelopment Corp.; and Gary L. Grossman,

Appellants.

PROOF OF SERVICE

I certify that I have served the **Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal** on the above-named Appellants by depositing a copy of it in the United States Mail, postage prepaid, on August 27, 2019, addressed to their attorney of record, G. Hamlin O'Kelley, III, 652 Coleman Blvd., Suite 200, Mt. Pleasant, SC 29464.

October 17, 2019



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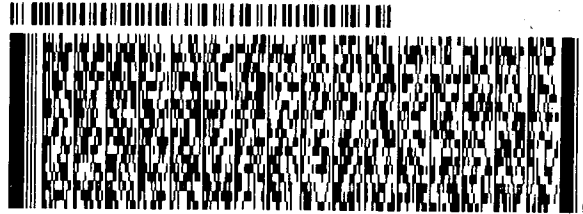
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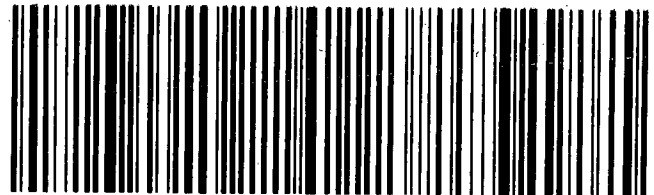
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