

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS
THE HONORABLE ROBIN B. STILWELL
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2019-001375
CIVIL ACTION NO. 2018-CP-23-3382

RECEIVED
FEB 04 2020
SC Court of Appeals

John H. Hine and Maria W. Hine,

APPELLANTS,

versus

Timothy M. McCrory, individually and as agent,
Michael P. McCrory, Seabrook L. Marchant, and
The Marchant Company,

RESPONDENTS.

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

The Respondents in the above referenced matter propose the following be included in the Record on Appeal:

1. Complaint, filed June 18, 2018;
2. Answer of Timothy M. McCrory as agent, Seabrook L. Marchant, and The Marchant Company, filed July 16, 2018;
3. Answer of Timothy M. McCrory, individually, filed July 16, 2018;
4. *Pro Se* Answer of Michael P. McCrory, filed July 18, 2018;

5. Amended Answer of Timothy M. McCrory, individually, filed July 23, 2018;
6. First Amended Complaint, filed August 15, 2018;
7. Answer of Timothy M. McCrory as agent, Seabrook L. Marchant, and The Marchant Company to the Amended Complaint, filed August 20, 2018;
8. Answer of Timothy M. McCrory, individually, filed August 20, 2018;
9. Motion for Summary Judgment of Timothy M. McCrory, Seabrook Marchant, and The Marchant Company, filed April 17, 2019 with attached exhibits:
 - A: May 14, 2012 Letter from Hine to Marchant with attached proposals from Galt Innovations and the Disclosure Statement;
 - B: July 9, 2012 Letter from Hine to Marchant;
 - C: Excerpts from Deposition of John M. Hine;
 - D: CL-100 Wood Infestation Report;
 - E: Pillar to Post Inspection Report;
 - F: Sargent Pest Solutions Residential Treatment Contract; and
 - G: Excerpts from Deposition of Maria Hine.
10. Michael P. McCrory's Motion to Join in the Motion for Summary Judgment, filed May 16, 2019;
11. Memorandum in Opposition to Motion for Summary Judgment, filed June 13, 2019, with attached exhibits, including deposition excerpts of Michael P. McCrory, Timothy McCrory, and Seabrook L. Marchant;
12. Entire transcript of hearing held before The Honorable Robin B. Stilwell, Jr. on June 18, 2019;
13. Order Granting Summary Judgment, filed July 23, 2018;
14. Motion to Alter or Amend, filed August 2, 2019; and
15. Order Denying Motion to Alter or Amend, filed August 8, 2019.

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

[signature on following page]

Respectfully submitted,



David A. Anderson
Carmen V. Ganjehsani
James B. Robey, III
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR RESPONDENTS
TIMOTHY M. McCRORY, individually
and as agent, SEABROOK L.
MARCHANT, and THE MARCHANT
COMPANY**

H. Chase Harbin
LAW OFFICE OF H. CHASE HARBIN, P.A.
419 Vardy Street
Greenville, SC 29601
(864) 288-6763
**ATTORNEYS FOR RESPONDENT
MICHAEL P. McCRORY**

February 3, 2020.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondents, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated February 3, 2020, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

M. Todd Carroll
Bryant S. Caldwell
WOMBLE BOND DICKINSON (US) LLP
1221 Main Street
Suite 1600
Columbia, SC 29201

John M. Hine
THE HINE LAW FIRM
PO Box 17095
Greenville, SC 29606
Attorneys for Appellants

RECEIVED
FEB 04 2020
SC Court of Appeals



Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
ATTORNEYS FOR RESPONDENTS

Dated: February 3, 2020.

Reply to: Carmen V. Ganjehsani
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

February 3, 2020

RECEIVED

FEB 04 2020

SC Court of Appeals

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

Re: *John Hine v. Timothy McCrory et al.*
Appellate Case No.: 2019-001375
RPR File No.: 101-2875

Dear Ms. Kitchings:

Enclosed for filing are the original Initial Respondents' Brief of Timothy M. McCrory, as agent and individually, Seabrook L. Marchant, The Marchant Company, and Michael P. McCrory and the Respondents' Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service.

By copy of this letter, we are this day serving a copy of our Initial Brief and Designations on opposing counsel.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,



Carmen V. Ganjehsani

Encs.

cc: M. Todd Carroll
John M. Hine
H. Chase Harbin
David A. Anderson, Esq. (FYI)
James B. Robey, III (FYI)

Hasler FIRST CLASS MAIL

02/03/2020
US POSTAGE \$002.20⁰⁰

ZIP 29201
011E11684119

101-2875

**RICHARDSON
PLOWDEN**
REGISTERED PROFESSIONAL CORPORATION, P.A.
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

RECEIVED

FEB 04 2020

SC Court of Appeals

RECEIVED

FEB 04 2020

SC Court of Appeals

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

