

RECEIVED

MAR 30 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907  
Appellate Case No. 2019-001599

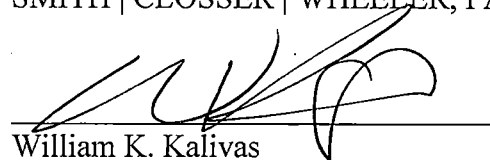
Karyn Cavanaugh ..... Appellant

v.

New Age Contractors, LLP ..... Respondent

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

SMITH | CLOSSER | WHEELER, PA



William K. Kalivas  
SC Bar No. 80201, wkalivas@scnlaw.com  
7455 Cross County Road, Ste 1 (29418)  
P.O. Box 40578, Charleston, SC 29423  
843-760-0220; 843-552-2678 (fax)  
Attorneys for New Age Contractors, LLP

March 27, 2020

18-163

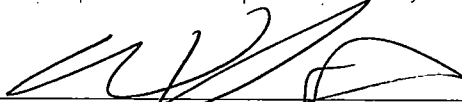
The undersigned attorney for Respondent hereby designates the following matter to be included in the Record on Appeal:

1. Notice of Appeal;
2. Transcript of September 10, 2018 hearing before the Honorable Henry W. Guerard;
3. Magistrate's Court Return with Exhibits filed March 4, 2019;
4. Transcript of July 31, 2019 hearing before the Honorable Deadra L. Jefferson; and
5. Order of the Honorable Deadra L. Jefferson dated August 13, 2019.

I certify that this Designation of Matters contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

SMITH | CLOSSER | WHEELER, P.A.



---

Steven L. Smith – [ssmith@scnlaw.com](mailto:ssmith@scnlaw.com)  
(SC Bar No.: 05173)

William K. Kalivas – [wkalivas@scnlaw.com](mailto:wkalivas@scnlaw.com)  
(SC Bar No.: 80201)

7455 Cross County Road, Suite 1

P.O. Box 40578

Charleston, SC 29423-0578

843-760-0220

*Attorneys for Respondent New Age Contractors, LLP*

March 27, 2020

Charleston, South Carolina

18-163

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED  
MAR 30 2020  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907  
Appellate Case No. 2019-001599

Karyn Cavanaugh ..... Appellant

v.


New Age Contractors, LLP ..... Respondent

**PROOF OF SERVICE**

I certify that I have served a copy of Respondent's Designation of Matters To Be Included in the Record on Appeal by depositing a copy of it in the United States Mail, post prepaid, on March 27, 2020 addressed to all attorneys of record, listed on the attached.

Respectfully Submitted,

SMITH | CLOSSER | WHEELER, PA

  
\_\_\_\_\_  
William K. Kalivas

SC Bar No. 80201, wkalivas@scnlaw.com  
7455 Cross County Road, Ste 1 (29418)  
P.O. Box 40578, Charleston, SC 29423  
843-760-0220; 843-552-2678 (fax)  
Attorneys for New Age Contractors, LLP

March 27, 2020

18-163

Ransome H. Helmly, Esquire  
SC Bar No.: 78081  
Law Office of Ransome H. Helmly, LLC  
409 Coleman Blvd., Ste. 200  
Mt. Pleasant, SC 29464  
843-884-0184  
[rh@helmlylaw.com](mailto:rh@helmlylaw.com)  
Attorney for Appellant

# Smith | Closser | Wheeler, P.A.

Attorneys at Law  
7455 Cross County Road, Suite One  
Post Office Box 40578  
Charleston, South Carolina 29423-0578

William K. Kalivas  
wkalivas@scnlaw.com

Office – 843-760-0220  
Fax – 843-552-2678

RECEIVED  
www.smithclosser.com

March 27, 2020

MAR 30 2020  
SC Court of Appeals

**VIA FIRST CLASS MAIL**

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

RE: Karyn Kavanaugh, Appellant v. New Age Contractors, LLP, Respondent  
Appellate Case No. 2019-001599  
SCW File No. 18-163

Dear Ms. Kitchings:

Enclosed for filing in connection with the above referenced case, please find the original and one copy of Respondent's Designation of Matters To Be Included in the Record on Appeal, as well as the Proof of Service. Please return one clocked copy in the self-addressed stamped envelope provided.

If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,



William K. Kalivas

cc: Ransome H. Helmly, Esq.

# Smith | Closser | Wheeler, P.A.

Attorneys at Law

7455 Cross County Road, Suite One

Post Office Box 40578

Charleston, South Carolina 29423-0578

FIRST-CLASS



US POSTAGE

\$ 000.65<sup>0</sup>

02 1P

0001173148

MAR 27 2020

MAILED FROM ZIP CODE 29418

**RECEIVED**

MAR 30 2020

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211