

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Circuit Case No. 2016-CP-10-4211

Appellate Case No. 2020-000278

RECEIVED

Apr 20 2020

SC Court of Appeals

William E. Danielson, Plaintiff

v.

Tyler Beauregard, Caroline Beauregard, and Born Capital, LLC, Defendants

Of which Born Capital, LLC is theAppellant

and

Of whom Caroline Beauregard is theRespondent

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following¹ be included in the Record on Appeal:

1. Plaintiff William E. Danielson’s Summons and Complaint, filed August 15, 2016;
2. Answer and Counterclaims of Defendants Tyler Beauregard and Caroline Beauregard, filed November 7, 2016;
3. Defendant Born Capital, LLC’s Answer to Plaintiff’s Complaint, filed November 8, 2016;
4. Plaintiff William E. Danielson’s Reply to Counterclaims of Defendants Tyler and Caroline Beauregard, filed November 18, 2016

¹ All exhibits and attachments referenced in the materials listed are to be considered incorporated herewith

5. Order of Reference, filed January 31, 2018
6. Scheduling Order, filed April 17, 2018
7. Defendant Born Capital's Amended Answer to Plaintiff's Complain and Crossclaims against Defendants Tyler Beauregard and Caroline Beauregard, filed May 3, 2018
8. Answer of Defendant Caroline Beauregard to Crossclaims of Born Capital, filed June 1, 2018
9. Amended Answer and Counterclaims of Defendant Caroline Beauregard to Crossclaims of Born Capital, filed August 6, 2018
10. Defendant Caroline Beauregard's Motion to Dismiss, filed August 10, 2018
11. Defendant Born Capital's Motion to Dismiss, filed August 13, 2018
12. Defendant Born Capital's Motion for Default Judgment against Defendant Tyler Beauregard, filed August 13, 2018.
13. Defendant Born Capital's Memo in Support of Motion to dismiss Defendant Caroline Beauregard's Cross Claims & Opposition to dismiss Defendant Born Capital's Cross Claims, submitted to the Court August 27, 2018
14. Master's Order denying Defendant Born Capital's Motion to Dismiss, filed August 30, 2018.
15. Defendant Born Capital's Answer to Defendant Caroline Beauregard's Counter Claims, filed September 7, 2018.
16. Master's Order – Order of Default Judgment against Defendant Tyler Beauregard, filed September 21, 2018.
17. Plaintiff's Motion for Summary Judgment, filed April 26, 2019.
18. Plaintiff's Motion to be Relieved as Counsel, filed April 26, 2019.
19. Defendant Caroline Beauregard's Motion for Summary Judgment against Defendant Born Capital's Cross Claims, filed May 6, 2019.
20. Plaintiff's Notice of Hearing, filed May 6, 2019.
21. Plaintiffs & Defendant Caroline Beauregard's Consent Order of Dismissal, filed May 6, 2019.
22. Plaintiffs & Defendant Born Capital's Stipulation of Dismissal with Prejudice of Claims between Plaintiff and Defendant Born Capital, filed May 9, 2019 .
23. Defendant Born Capital's Motion for Summary Judgment, filed May 29, 2019.
24. Affidavit of Tyler Beauregard, dated June 13, 2019.

25. Defendant Caroline Beauregard's Brief in Support of Judgment against Defendant Born Capital (Opposing Born Capital's Motion for Summary Judgment), filed June 17, 2019.
26. Defendant Born Capital's Memo in Opposition to Caroline Beauregard's Motion for Summary Judgment Against Born Capital's Cross Claims and in Support of Born Capital's Motion for Summary Judgment Against Carolina Beauregard's Counterclaim, dated and submitted to the Court June 19, 2019 and clocked on July 10, 2019.
27. Defendant Caroline Beauregard's (Supplemental) Brief in Support of Judgment against Defendant Born Capital, filed June 21, 2019.
28. Master's Order denying Motions for Summary Judgment, filed June 21, 2019.
29. Motion to Lift Default re: Defendant Tyler Beauregard, filed July 5, 2019.
30. Defendant Carolina Beauregard's Renewed Motion for Summary Judgment Against the Cross Claims of Born Capital, LLC, filed September 17, 2019.
31. Defendant Caroline Beauregard's Notice and Motion for Continuance, filed October 16, 2019.
32. Affidavit of Julia P. Copeland (Attorney for Defendant Caroline Beauregard), filed October 16, 2019.
33. Defendant Born Capital's Trial Brief (and brief opposing Defendant Caroline Beauregard's Motion for Summary Judgment Against Born Capital's Cross-Claims), submitted to court October 17, 2019.
34. Trial Transcript regarding the October 17, 2019 hearings and trial.
35. Trial Exhibits Marked Defense Exhibits 1 through 24.
36. Order and Judgment for Plaintiff William E. Danielson Against Tyler Beauregard, filed November 27, 2019.
37. Order and Judgment regarding Defendant Born Capital's Cross-Claims against Defendants Tyler Beauregard and Caroline Beauregard and Defendant Caroline Beauregard's Cross Claim against Born Capital, filed January 21, 2020.
38. Notice of Appeal, filed February 18, 2020

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

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April 17, 2020



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Fax Cover Sheet

To: South Carolina Court of Appeals
Tel. No.
Fax No. 803-734-1839
Re: Appellate Case No. 2020-000278
1) Initial Brief of Appellant
2) Designation of Matter

From: Patrick Flynn
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Date: April 17, 2020
Pages: 25 (including coversheet)

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