

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Apr 27 2020**

**SC Court of Appeals**

APPEAL FROM BEAUFORT COUNTY  
Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2019-001676  
Trial Court Case No. 2018-CP-07-1559

Charles E. Houston, Jr. ....Appellant,

v.

Dean B. Bell, individually;  
Law Offices of Dean B. Bell, LLC; and  
B. Hammel Properties, LLC ..... Respondents.

**RESPONDENT B. HAMMEL PROPERTIES, LLC'S DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD ON APPEAL**

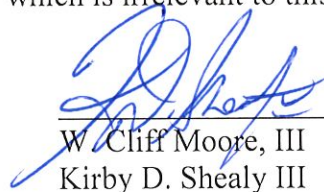
Respondent, B. Hammel Properties, LLC, proposes the following be included in the Record on Appeal:

1. Order of Reference filed September 4, 2012 in Partition Action with Action Cover Sheet, Motion and Order Information Form and Coversheet and Shirley Ellis cover letter;
2. Final Order in Partition Action filed July 19, 2013;
3. Order Denying Motion to Reconsider in Partition Action filed September 11, 2013;
4. Order in Appellate Case No. 2013-002166, February 20, 2014;
5. Remittitur, Appellate Case Number 2013-002166, March 10, 2014;
6. Satisfaction of Judgment in Partition Action filed July 22, 2015;
7. Order Granting B. Hammel Properties, LLC Summary Judgment filed September 4, 2019;
8. Order Granting Dean B. Bell, individually, and Law Offices of Dean B. Bell, LLC Summary Judgment filed September 4, 2019;
9. Order of Supreme Court in this appeal entered October 24, 2019;
10. Complaint in Partition Action filed on December 7, 2011;
11. Answer of Appellant in Partition Action filed February 14, 2012;
12. Motion for Reference in Partition Action filed June 4, 2012;
13. Motion for Summary Judgment in Partition Action filed June 4, 2012;
14. Certificate of Mailing of Motion for Summary Judgment and Motion for Reference in Partition Action, June 4, 2012;
15. Summons and First Amended Complaint in Partition Action, with Action Cover Sheet

- filed October 4, 2012;
16. Answer to First Amended Complaint in Partition Action filed November 20, 2012;
  17. Notice of Motion and Motion for Reconsideration in Partition Action filed July 30, 2013;
  18. Notice of Appeal, Appellate Case Number 2013-002166, September 27, 2013;
  19. Complaint filed July 13, 2018, with Exhibit 1;
  20. Affidavit of Bell in Support of Motion to Strike Affidavit of Default dated October 24, 2018, with exhibits;
  21. Hammel Memorandum in Support of Summary Judgment filed June 4, 2019, and only Exhibit 6 to Memorandum;
  22. Appellant's Affidavit in Opposition to Motion for Summary Judgment dated June 6, 2019 and filed June 10, 2019;
  23. Appellant's October 2, 2019 Letter filing the Notice of Appeal;
  24. Letter from Clerk of Court to Appellant dated October 8, 2019;
  25. Brief on Venue to Supreme Court in this appeal filed October 18, 2019, without exhibits;
  26. Brief on Venue to Supreme Court in this appeal filed October 22, 2019, without exhibits;
  27. Deposition of Charles E. Houston, December 12, 2018; pages 24 through 51;
  28. Transcript of Hearing, June 10, 2019;
  29. Partition Deed to B. Hammel Properties, LLC recorded July 7, 2015 in Book 3412 at Page 462; and
  30. Deed from B. Hammel Properties, LLC to DMS Funding I, LLC, LLC recorded May 31, 2018 in Book 3672 at Page 263.

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

April 27, 2020.



W. Cliff Moore, III  
Kirby D. Shealy III  
Adams and Reese LLP  
Post Office Box 2285  
Columbia, S.C. 29202  
P: 803-254-4190

and  
Thomas C. Taylor  
Law Offices of Thomas C. Taylor, LLC  
PO Box 5550  
Hilton Head Island, SC 29938  
P: 843-785-5050

Attorneys for Respondent,  
B. Hammel Properties, LLC,

THE STATE OF SOUTH CAROLINA  
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Appellate Case No. 2019-001676  
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Charles E. Houston, Jr. ....Appellant,

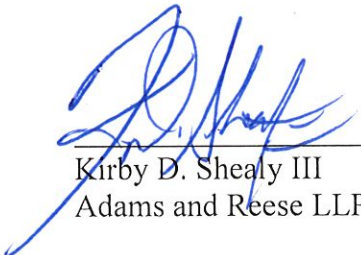
v.

Dean B. Bell, individually;  
Law Offices of Dean B. Bell, LLC; and  
B. Hammel Properties, LLC, ..... Respondents.

**PROOF OF SERVICE**

I certify that I have caused to have served the foregoing Initial Brief of Respondent B. Hammel Properties, LLC and Respondent’s Designation of Matter to be Included in the Record on Appeal on the Appellant, Charles E. Houston, Jr., by having a copy deposited in the United States Mail, postage prepaid, on April 27, 2020 addressed to Mr. Charles E. Houston, Jr., 100 Shady Brooke Walk, Fayetteville, Georgia 30214.

I further certify that I have caused to have served the foregoing Initial Brief of Respondent B. Hammel Properties, LLC and Respondent’s Designation of Matter to be Included in the Record on Appeal on the Respondent Dean B. Bell, individually and the Law Offices of Dean B. Bell, LLC by having a copy deposited in the United States Mail, postage prepaid, on April 27, 2020, addressed to Dean B. Bell, 6120 College Street, Ste. D121, Beaumont, Texas 77707.

  
\_\_\_\_\_  
Kirby D. Shealy III  
Adams and Reese LLP



April 27, 2020

Via OneDrive

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals

RE: *Charles E. Houston, Jr. v. Dean B. Bell, et al.*  
Appellate Case No. 2019-001676  
A&R File No. 050168-000411

Dear Ms. Kitchings:

I am hereby filing the Respondent B. Hammel Properties, LLC's Initial Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service in the referenced case. I would appreciate acknowledgement of the filing via email.

Thank you for your assistance with this matter.

Sincerely,

Kirby D. Shealy III

KDSIII/jas

Enclosure(s)

cc: *via U.S. Mail and E-Mail w/encl.*  
Mr. Charles E. Houston, Jr.  
Dean B. Bell, Esq.

cc: *via E-Mail w/encl.*  
Thomas C. Taylor, Esq.

Attorneys at Law

Alabama

Florida

Georgia

Louisiana

Mississippi

South Carolina

Tennessee

Texas

Washington, DC

Kirby D. Shealy III

Direct: 803.212.4966

E-Fax: 803.343.1258

[kirby.shealy@arlaw.com](mailto:kirby.shealy@arlaw.com)