

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

The Honorable Deadra L. Jefferson, Circuit Court Judge

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Civil Action No.: 2018-CP-08-00817  
Appellate Case No.: 2019-001140

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Ronald L. Jones and Gayle Langley Jones, Thomas Huguenin Gaillard, as Trustee of The Thomas Huguenin Gaillard Revocable Trust, Dated April 3, 2007, and Thomas W. Cone, Jr., as Trustee of The Thomas W. Cone, Jr. Revocable Trust, Dated April 3, 2007, Respondents,

v.

Rogers Townsend & Thomas, P.C.; Lisa Hostetler; Alexander C. Peabody; and Peabody & Associates, Inc., Defendants,

Of Which Rogers Townsend & Thomas, P.C. and Lisa Hostetler are Appellants.

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DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL BY  
RESPONDENTS THOMAS HUGUENIN GAILLARD, AS TRUSTEE OF THE  
THOMAS HUGUENIN GAILLARD REVOCABLE TRUST, DATED APRIL 3,  
2007, AND THOMAS W. CONE, JR., AS TRUSTEE OF THE THOMAS W.  
CONE, JR. REVOCABLE TRUST, DATED APRIL 3, 2007

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J. Jay Hulst  
S.C. Bar No. 71667  
P.O. Box 1288  
Moncks Corner, SC 29461  
(843) 761-8232  
jjh@williamsandhulst.com

Attorneys for Respondents  
Thomas Huguenin Gaillard and  
Thomas W. Cone, as Trustees above

**RECEIVED**  
MAY 07 2020  
SC Court of Appeals

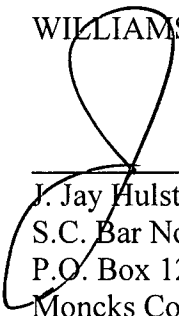
The Respondents, Thomas Huguenin Gaillard, as Trustee of The Thomas Huguenin Gaillard Revocable Trust, Dated April 3, 2007, and Thomas W. Cone, Jr., as Trustee of The Thomas W. Cone, Jr. Revocable Trust, Dated April 3, 2007, designate and propose the following additional materials to be included in the Record on Appeal, pursuant to Rule 209 SCACR:

1. Respondents refer to and incorporate by reference into this designation all materials identified in Appellants' Designation of Matter to be Included in the Record on Appeal dated February 11, 2020; and
2. Opposition of Trustee Plaintiffs Thomas Huguenin Gaillard and Thomas W. Cone, Jr. to Motion for Reconsideration and to Alter or Amend Filed May 29, 2019.
  - i. Exhibit A: April 4, 2006 Deed from Monaghan to Daniel.
  - ii. Exhibit B: Complaint.
  - iii. Exhibit C: Hostetler and Rogers Townsend & Thomas, P.C.'s Answer.
  - iv. Exhibit D: Defendant's Motion to Add a Party (Rule 19(a)) and Memorandum in Support of Motion to Add a Party (SCRCP 19(a)).
  - v. Exhibit E: Order dated August 6, 2018 and filed on August 13, 2018.
  - vi. Exhibit F: Access, Maintenance and Joint Dock Use Agreement.
  - vii. Exhibit G: Plaintiffs Thomas Huguenin Galliard and Thomas W. Cone, Jr's Motion for Nonjoinder Pursuant to Rule 21 SCRCP.
  - viii. Exhibit H: Defendants' Motion to Amend the Answer.
  - ix. Exhibit I: Form 4 Order executed and filed on May 9, 2019.
  - x. Exhibit J: Emails between counsel dated March 29, 2019; and
3. Exhibit A to Appellants' Return to Respondent's Motion to Dismiss (Deed from Coastal Plains Development Co., Inc., to James Monaghan dated April 8, 2005.)

**CERTIFICATION OF COUNSEL**

The undersigned counsel hereby certifies that this designation of matter contains no matter which is irrelevant to this appeal pursuant to Rule 209(c) SCACR.

WILLIAMS & HULST, LLC



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Attorneys for Respondents Thomas  
Huguenin Gaillard, as Trustee of The  
Thomas Huguenin Gaillard Revocable  
Trust Dated April 3, 2007, and Thomas  
W. Cone, Jr., as Trustee of The Thomas  
W. Cone, Jr. Revocable Trust Dated  
April 3, 2007

Moncks Corner, South Carolina  
May 1, 2020

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In the Court of Appeals

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SC Court of Appeals

Ronald L. Jones and Gayle Langley Jones, Thomas Huguenin Gaillard, as Trustee of The Thomas Huguenin Gaillard Revocable Trust, Dated April 3, 2007, and Thomas W. Cone, Jr., as Trustee of The Thomas W. Cone, Jr. Revocable Trust, Dated April 3, 2007, Respondents,

v.

Rogers Townsend & Thomas, P.C.; Lisa Hostetler; Alexander C. Peabody; and Peabody & Associates, Inc., Defendants,

Of Which Rogers Townsend & Thomas, P.C. and Lisa Hostetler are Appellants.

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PROOF OF SERVICE

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I certify that I have served a copy of Respondents' Thomas Huguenin Gaillard, as Trustee of The Thomas Huguenin Gaillard Revocable Trust, Dated April 3, 2007, and Thomas W. Cone, Jr., as Trustee of The Thomas W. Cone, Jr. Revocable Trust, Dated April 3, 2007, Initial Brief and Designation of Matter to be Included in the Record on Appeal, with regard to the above cited matter on all parties by depositing a copy of said Initial Brief, in the United States mail, postage prepaid on May 1, 2020, addressed to counsel for Appellant, Warren C. Powell, Jr., Bruner Powell Wall & Mullins, LLC, Post Office Box 61110, Columbia, South Carolina 29260-1110, and addressed to counsel for Respondents Ronald L. Jones and Gayle Langley Jones, Robert W. Maring, Maring & Moyer, LLC, Post Office Box 478, Georgetown, SC 29442, and on Defendants Alexander C. Peabody and Peabody & Associates, Inc., .

*Katherine S. Brenza*

Katherine S. Brenza, Paralegal

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# WILLIAMS AND HULST, LLC.

ATTORNEYS AT LAW



May 1, 2020

Appellate work  
Aviation law  
Business formation  
Commercial disputes  
Condemnation  
Construction law  
Contracts  
Insurance coverage  
Municipal law  
Personal injury  
Probate and estate matters  
Real estate  
Utility industry related matters  
Wills  
Wrongful death

The Honorable Jenny Abbott Kitchings  
Clerk of Court SC Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: Ronald L. Jones v. Rogers Townsend & Thomas, P.C.  
Appellate Case No.: 2019-001140

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MAY 07 2020

**SC Court of Appeals**

Dear Ms. Kitchings:

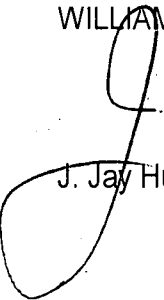
Enclosed for filing is an original of Respondents' Thomas Huguenin Gaillard and Thomas W. Cone, Jr.'s, Initial Brief, Designation of Matter and Proof of Service, in the above cited action.

Thank you for your assistance.

With kindest regards, I remain

Sincerely,

WILLIAMS AND HULST, LLC



J. Jay Hulst


JJH/ksb


Enclosures as stated

cc: Warren C. Powell, Esq.  
Robert W. Maring, Esq.  
Ryan A. Earhart, Esq.  
(Via U.S. mail w/enclosures)

# WILLIAMS AND HULST, LLC.

ATTORNEYS AT LAW

  
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Moncks Corner, SC 29461

  
MAY 07 2020  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court SC Court of Appeals  
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