

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

May 13 2020

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Gordon G. Cooper, Master-in-Equity

Case No. 2019-CP-42-01210

Ct. App. No. 2019-002071

Joe Hand Promotions, Inc., ..... Appellant,

v.

Christopher Michael Ruegsegger a/k/a Chris Ruegsegger,  
Founders Federal Credit Union and Springleaf Financial  
Services..... Defendants

Of which Founders Federal Credit Union is the ..... Respondent.

**RESPONDENT'S DESIGNATION OF MATTER  
TO THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Respondent hereby designates the following materials to the Record on Appeal in this matter:

1. Order and Judgment of Foreclosure and Sale (filed July 24, 2019)
2. Order Granting Motion to Reconsider, Alter or Amend (filed September 24, 2019)
3. Order Granting in Part and Denying in Part Plaintiff's Motion to Reconsider, Alter or Amend (filed November 22, 2019)
4. Respondent's Motion to Reconsider (filed August 2, 2019)
5. Appellant's Motion to Reconsider (filed October 3, 2019)
6. Complaint (including all exhibits) (filed March 29, 2019)
7. Respondent's Answer (filed May 9, 2019)

8. Transcript of foreclosure trial, July 17, 2019
9. Transcript of Respondent's Motion to Reconsider, August 27, 2019
10. Transcript of Appellant's Motion to Reconsider, November 12, 2019
11. Appellant's Petition for Supplementary Proceedings (filed March 27, 2018)
12. Rule to Show Cause (filed April 6, 2018)
13. Mr. Ruegsegger's Chapter 7 Voluntary Bankruptcy Petition (filed March 30, 2018)
14. Quit Claim Deed to Christopher Ruegsegger (recorded June 8, 2012)

The undersigned hereby certifies that this Designation contains no matter that is irrelevant to this appeal.

s/ Suzanne Taylor Graham Grigg

---

Suzanne Taylor Graham Grigg  
Nexsen Pruet, LLC  
Post Office Drawer 2426  
Columbia, SC 29202  
Phone: (803) 540-2026  
Fax: (803) 727-1440  
Email: sgrigg@nexsenpruet.com  
*Attorneys for Respondent  
Founders Federal Credit Union*

May 13, 2020  
Columbia, South Carolina

May 13, 2020

**VIA FACSIMILE (803) 734-1839**

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

**RECEIVED**

**May 13 2020**

**SC Court of Appeals**

Re: Joe Hand Promotions, Inc. (Appellant) v. Founders Federal Credit  
Union (Respondent), et al.  
Appellate Case No. 2019-002071

Dear Ms. Kitchings:

Regarding the above-referenced case, pursuant to Supreme Court Order 2020-03-20-1, I am transmitting to you for filing via facsimile the Initial Brief of Respondent, as well as Respondent's Designation of Matter to the Record on Appeal.

I am also serving counsel for Appellant, Leonard R. Jordan, Esq., via his AIS email address.

Very truly yours,

s/Suzanne Taylor Graham Grigg

cc: Leonard R. Jordan, Esq. (via e-mail)

Charleston  
Charlotte

**Columbia**  
Greensboro

Greenville  
Hilton Head

Myrtle Beach

Raleigh

# NEXSEN | PRUET

## FAX TRANSMISSION

**RECEIVED**

**May 13 2020**

**SC Court of Appeals**

**To:**

CTAPPEALS

**FAX No.:**

8037341839

**FROM:** Kyle

**PHONE:**

**FAX:** 8037271447

**DATE:** 5/13/2020

**RE:**

Case No. 2019-002071 - Respondent's Initial Brief and DOM [IWOV-NPCOL1.FID1513653]

**NUMBER OF PAGES WITH COVER PAGE:** 2

**Message:**

Dear Ms. Kitchings:

Pursuant to Supreme Court Order 2020-03-20-1, please find attached for filing and for service on Appellant's counsel via AIS email address the following:

- (1) Cover letter from Suzanne Grigg, counsel for Respondent Founders Federal Credit Union;
- (2) Initial Brief of Respondent; and
- (3) Respondent's Designation of Matter to the Record on Appeal.

Please send us a file-stamped copy of these documents when convenient for you, and please let us know if the Court would like us to take any additional action related to this filing at this time. Thank you for your help, and I appreciate Shelly's time on the phone yesterday afternoon.

**Kyle A. Brannon**

Member

Nexsen Pruet, LLC

1230 Main Street, Suite 700

Columbia, SC 29201

Post Office Box 2426 (29202)

T: 803.540.2168, F: 803.727.1447

[KBrannon@nexsenpruet.com](mailto:KBrannon@nexsenpruet.com)

[www.nexsenpruet.com](http://www.nexsenpruet.com)

CHARLESTON, SC 29402	843.577.9440	GREENVILLE, SC 29601	864.370.2211
CHARLOTTE, NC 28202	704.339.0304	HILTON HEAD, SC 29926	843.689.6277
COLUMBIA, SC 29201	803.771.8900	MYRTLE BEACH, SC 29575	843.213.5400
GREENSBORO, NC 27408	336.373.1600	RALEIGH, NC 27511	919.755.1800

### CONFIDENTIALITY NOTE

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR DUPLICATION OF THIS TELECOPY IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TELECOPY IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS ABOVE VIA THE UNITED STATES POSTAL SERVICE. THANK YOU.

**IF YOU DO NOT RECEIVE ALL OF THE PAGES,  
PLEASE CALL THE APPROPRIATE OFFICE (ABOVE) AS SOON AS POSSIBLE.**

