

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable Deadra L. Jefferson, Circuit Court Judge

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

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MAY 15 2020

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, 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.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL BY
RESPONDENTS RONALD L. JONES AND GAYLE LANGLEY JONES

Robert W. Maring
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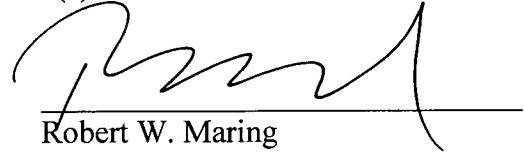
Attorney for Respondents Ronald L.
Jones and Gayle Langley Jones

The Respondents, Ronald L. Jones and Gayle Langley Jones, 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. Respondents refer to and incorporate by reference into this designation all materials identified in Trustee Respondents Designation of Matter to be Included in the Record on Appeal dated May 1, 2020; and
3. Exhibit A Expert Affidavit of Charles O. Nation attached as Exhibit A to the Complaint.

CERTIFICATE 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.



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Attorney for Respondents Ronald L.
Jones and Gayle Langley Jones

Georgetown, SC
May 13, 2020

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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.

PROOF OF SERVICE

I certify that I have served a copy of Respondents' Ronald L. Jones and Gayle Langley Jones, Initial Brief and Designation of Matter to be Included in the Record on Appeal, with regards to the above cited matter on all parties by depositing a copy of said Initial Brief, in the U.S. Mail, postage prepaid May 13, 2020, addressed to counsel for Appellant, Warren C. Powell, Jr., Bruner Powell Wall & Mullins, LLC, Post Office Box 61110, Columbia, SC 29260-1110, and addressed to counsel 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, J. Jay Hulst, Post Office Box 1288, Moncks Corner, SC 29461, and on Defendants Alexander C. Peabody and Peabody & Associates, Inc., Post Office Box 22528, Charleston, SC 29413.



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Jones and Gayle Langley Jones



**MARING &
MOYER, LLC**
ATTORNEYS AT LAW

Robert W. Maring **

Laura M. Moyer *

** Certified Circuit Court Mediator

* Certified Family Court Mediator

May 13, 2020

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

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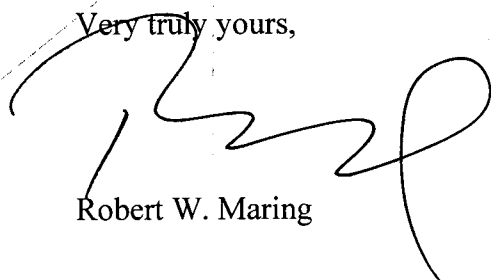
Re: Ronald L. Jones v. Rogers Townsend & Thomas, P.C.
Appellate Case No. 2019-00140

Dear Mr. Kitchings:

Please find enclosed herewith the Original and (1) Copy of the Initial Brief Of Respondents, Ronald L. Jones And Gayle Langley Jones, Designation Of Matter To Be Included In The Record On Appeal By Respondents Ronald L. Jones And Gayle Langley Jones, Proof of Service and Certificate of Counsel for the above referenced matter. Please return a clocked copy to this office in the self addressed prepaid envelope provided.

With kindest regards, I am

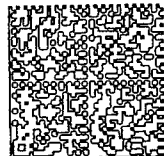
Very truly yours,


Robert W. Maring

cc: Warren C. Powell, Esquire
Jary J. Hulst, Esquire
Ryan A. Earhart, Esquire



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Georgetown, SC 29442-0478

TO: The Hon. Jenny A. Kitchings
SC Court of Appeals
PO Box 11629
Columbia, SC 29211

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