

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace G. Knie, Circuit Court Judge

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Appellant Case No. 2019-002122  
Lower Court Case No. 2016-CP-42-0727

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**RECEIVED**

**Aug 21 2020**

**SC Court of Appeals**

William A. Morgan, Respondent,

v.

Sterling Estates Homeowner's Association, Inc. and Paul Thomas Garner, Defendants,

Of Which Paul Thomas Garner.....Appellant.

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**DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

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Respondent proposes the following to be included in the Record on Appeal:

1. Respondent's Complaint filed February 17, 2016;
2. Transcript of Proceedings October 1, 2018;
3. Order of October 2, 2018;
4. Respondent's Motion to Enforce Settlement filed November 20, 2018;
5. Respondent's Brief in Support of Motion to Enforce Settlement, including Exhibits A-P, filed August 15, 2019;
6. Order of September 6, 2019;
7. Appellant's Motion to Reconsider filed September 15, 2019;
8. Respondent's Memorandum in Opposition to Appellant's Motion to Reconsider filed October 31, 2019; and
9. Order of November 26, 2019.

*s/ Jason M. Imhoff*

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Jason M. Imhoff

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*Attorney for Respondent*

August 21, 2020

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**PROOF OF SERVICE**

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I certify that I have served the Initial Brief of Respondent William A. Morgan and Respondent's Designation of Matter to be included on the Record on Appeal on Appellant Paul T. Garner and the Sterling Estate's Homeowner's Association, Inc. by electronic mail, on August 21, 2020, addressed to Appellant's attorneys of record, M. Kyle Thompson and Allison M. Mabbs, 325 Rocky Slope Road, Suite 201, Greenville, South Carolina, 29607, [mkthompson@wjlaw.net](mailto:mkthompson@wjlaw.net) and the Sterling Estate's Homeowner's Association, Inc.'s attorney of record, Damon C. Wlodarczyk, Riley Pope & Laney, LLC, P.O. Box 11412, Columbia, SC 29211, [damonw@rlfirm.com](mailto:damonw@rlfirm.com).

*s/ Jason M. Imhoff*

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August 21, 2020

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SC Court of Appeals

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August 21, 2020

**Via Electronic Mail** - [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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

**Re: *William A. Morgan v. Paul T. Garner, et al.***  
**Appellate Case No. 2019-002122**

Dear Honorable Kitchings:

Attached please find the following for filing:

1. Initial Brief of Respondent; and
2. Respondent's Designation of Matter to be included in the Record on Appeal.

Also attached is a Proof of Service upon opposing counsel.

With kindest regards, I remain

Very truly yours,

THE WARD LAW FIRM, PA

*Jason M. Imhoff*

Jason M. Imhoff  
*Attorney for Respondent*

JMI/sss

Attachments: Initial Brief if Respondent  
Respondent's Designation of Matter

cc(via email)(w/attach): M. Kyle Thompson, Esquire - [mkthompson@wjlw.net](mailto:mkthompson@wjlw.net)  
Damon C. Wlodarczyk, Esquire - [damonw@rplfirm.com](mailto:damonw@rplfirm.com)