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**Oct 15 2020**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
In the Court of Appeals

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**APPEAL FROM CHARLESTON COUNTY CIRCUIT COURT**  
Bentley D. Price, Circuit Court Judge

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Appellate Case No.: 2020-000932

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Miguel Oyuela-Martinez,..... Appellant,

v.

Kuhn & Kuhn, LLC,.....Respondent.

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

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Pursuant to Rule 209, SCACR, Appellants designate the following items for inclusion in the Record on Appeal:

Orders:

1. Order Judge Culbertson Charleston County dated July 29, 2019;
2. Order Judge Price Charleston County dated May 28, 2020;

Pleadings:

1. Plaintiff's Complaint dated January 22, 2019;
2. Answer of Kuhn and Kuhn, LLC dated February 19, 2019;
3. Answer of John Robert Kuhn dated February 28, 2019;
4. Defendants' Motion to Dismiss dated February 19, 2019;
5. Defendant Kuhn & Kuhn, LLC's Motion for Summary Judgment dated June 7, 2019;

Transcripts:

6. Transcript of Hearing with Judge Culbertson dated June 18, 2019;

7. Transcript of Hearing with Judge Price dated May 5, 2020;
8. Transcript of Hearing with Judge Price dated May 14, 2020;

Correspondence:

9. Email correspondence dated May 26, 2020 (Judge Price responded to a question regarding language in the proposed order);

Exhibits:

10. Bar Complaint dated February 26, 2019;
11. Affidavit of John Kuhn dated June 7, 2019;
12. Affidavit of Angelique White dated November 27, 2018;

/s/ Kevin B. Smith  
Kevin B. Smith  
SC Bar No: 70587  
Amanda R. Itterly  
SC Bar No.: 103028  
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Attorneys for Appellants

North Charleston, SC

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**CERTIFICATION OF COUNSEL**

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Counsel hereby certifies that the Appellant's Initial Brief complies with the requirements of Rule 211 of the South Carolina Appellate Court Rules, and that the Designation of Matter to be Included in the Record on Appeal contains no material which is irrelevant to the appeal.

/s/ Kevin B. Smith  
Kevin B. Smith  
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**PROOF OF SERVICE**

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I certify that I have served the Appellants' Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Certificate of Counsel addressed to the attorneys of record as follows: John R. Kuhn, Esq., Kuhn & Kuhn, LLC, 473 Savannah Hwy., Charleston, SC 29407 and Jeffrey M. Crudup, Esq., Clarkson, Walsh & Coulter, P.A., 497 St. Andrews Boulevard, Charleston, SC 29407.

/s/ Kevin B. Smith

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

RE: Miguel Oyuela-Martinez v. Kuhn and Kuhn, LLC  
Appellate Case No.: 2020-000932

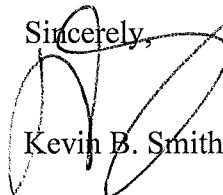
Dear Ms. Kitchings:

Please find for filing Appellant's Initial Brief, Designation of Matter to be Included in the Record on Appeal, Proof of Service, and Certificate of Counsel in the above-referenced matter.

By copy hereof to John Robert Kuhn, Esquire and Jeffrey M. Crudup, Esquire, Attorneys for the Respondent, I am serving upon the Respondents a copy of the Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Certificate of Counsel.

Thank you very much for your assistance in this matter. With kind regards, I am

Sincerely,



Kevin B. Smith

KBS/ai

cc: John Robert Kuhn, Esq.  
Jeffrey M. Crudup, Esq.