

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2020-000021

RECEIVED

Dec 01 2020

SC Court of Appeals

In the Matter of the Estate of Chris Combis,

Desa Ballard, as Personal Representative of the Estate of Chris Combis,
Respondent

v.

George Combis, Diane Combis, and Chris Combis,
Defendants,

Of Whom, George Combis and Chris Combis are the
Appellants,

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

Pursuant to Rule 209, SCACR, Respondent proposes the following be included in the Record on Appeal. Unless otherwise stated, all items designated include exhibits and exclude proof of service, cover sheets, motion forms, and notices. Appellants' designations include multiple irrelevant documents, and also violate Rule 209(c)¹, SCACR, in that they are not organized as required, nor do they reference what was, and was not, before the trial court by

¹ "Matter contained in the Record on Appeal shall be arranged in the following order: the title page, index, orders, judgments, decrees, decisions, . . ."

exhibit number. By way of example only, orders appear throughout the designations, rather than being grouped at the beginning. *See* footnote 1. The caption is also wrong.

Respondent Ballard reserves the right to amend her designations in the event Appellants correct their designations to be in compliance with the SCACR.

ORDERS

Order for Removal to the Court of Common Pleas Filed March, 14, 2014

Findings of Fact and Conclusions of Law and Order Filed September 1, 2016

Order Granting Motion to Compel Filed August 8, 2017

Order for Judgment Filed August 25, 2017

Order and Rule to Show Cause to George Combis, Diane Combis and Chris A. Combis Filed September 5, 2017

Order Denying Motion for Protective Order (Email dated September 11, 2017)

Order of the US 4th Circuit Court of Appeals Filed January 8, 2019

Order for Civil Contempt Filed October 21, 2019

Order Granting Motion to Reconsider in part Filed December 31, 2019

Findings of Fact and Conclusions of Law and Order dated January 3, 2020

Order Staying Case Filed January 03, 2020

PLEADINGS

Subpoena for Gun and Rolex Watch issued to George and Chris A. Combis respectively on March 16, 2017

Verified Petition and Request for Rule to Show Cause dated August 24, 2017

Response to Respondents' Motion to Reconsider filed November 13, 2019

TRANSCRIPTS

Transcript of Record (Day 1) of Hearing on November 14, 2017

Transcript of Record (Day 2) of Hearing on November 17, 2017

Transcript of Record of Hearing on August 05, 2019

Transcript of Record of Hearing on December 18, 2019

EXHIBITS

Pellington letter enclosing photos and list of items with pictures dated August 14, 2017

Respondents Exhibits 1- 6 from hearing held on November 14, 2017

Respondents Exhibits 7 from hearing held on November 17, 2017

Plaintiff's Exhibits P1, P3 and P4 from hearing held on August 5, 2019

Courts Exhibit 1 from hearing held on August 5, 2019

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

s/Douglas N. Truslow

Douglas N. Truslow

Neal D. Truslow

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December 1, 2020

Attorney for Respondent

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PROOF OF SERVICE

I, Douglas Truslow, Esquire, attorney for Respondent, certify that a true and correct copy of the forgoing document(s) was served upon all parties of record listed below by placing a copy in the United States Mail to the following address(es):

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DOCUMENT(S): 1. **RESPONDENT'S DESIGNATION OF MATTER**

s/Douglas N. Truslow

Douglas N. Truslow
Neal D. Truslow
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December 1, 2020

Attorney for Respondent