

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Charles B. Simmons, Master in Equity

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Civil Action No. 2018-CP-39-00585  
Appellate Case No. 2020-000396

**RECEIVED**  
**Dec 01 2020**  
**SC Court of Appeals**

Terence "Terry" Carroll.....Appellant,

v.

Debra Mowery, TD Realty, Upstate RE Group, Hawk Shadow Business Services, LLC, and Debra Mowery, Realtor.....Respondents.

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

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Attorneys for the Respondents

December 1, 2020

## INDEX

1. Summons and Notice of Complaint filed May 16, 2018
2. Lis Pendens Notice of Pendency of Action filed May 16, 2018
3. Summons and Notice Amended Complaint filed June 18, 2018
4. Amended Lis Pendens filed June 18, 2018
5. Answer to Amended Complaint and Counterclaims of Defendants filed June 26, 2018
6. Reply to Answer and Counterclaim filed July 11, 2018
7. Motion for Partial Summary Judgment and Supporting Memorandum of Law with Exhibits filed September 20, 2019
8. Order of Continuance and Order of Reference to Special Referee filed October 16, 2019
9. Order filed January 6, 2020
10. Order (Plaintiff's Motion for Reconsideration Alteration and or Amendment) filed February 18, 2020
11. Transcript, pages 1 – 232
12. Defendant's Exhibit 1: 109 Linda Lane Deeds (Corrective Deed & Warranty Deed)
13. Defendant's Exhibit 2: 204 S. 9<sup>th</sup> Street Deed
14. Defendant's Exhibit 3: 539 Pope Field Deed
15. Defendant's Exhibit 4: 4548 Church St. Deed
16. Defendant's Exhibit 5: 2016 Closing Disclosure (4548 Church)
17. Defendant's Exhibit 6: 2018 539 Pope Field Closing Documents
18. Defendant's Exhibit 7: Mechanic's Lien Filed by Plaintiff
19. Defendant's Exhibit 8: Articles of Organization – Hawk Shadow Business Services
20. Defendant's Exhibit 9: Articles of Organization – TD Realty, LLC
21. Defendant's Exhibit 10: Lease Agreement – Upstate RE Group, Inc.
22. Defendant's Exhibit 11: Jaguar Title
23. Defendant's Exhibit 16: Inspection Report – 109 Linda Lane
24. Defendant's Exhibit 17: Inspection Report – 204 S. 9<sup>th</sup> Street
25. Defendant's Exhibit 18: Tax Returns 2011 – 2017
26. Defendant's Exhibit 19: Edward Jones Retirement Distribution
27. Defendant's Exhibit 20: Articles of Organization – Upstate RE Group, Inc.

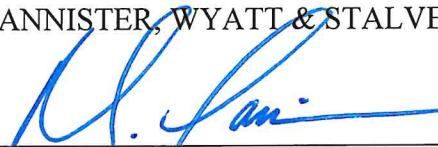
28. Defendant's Exhibit 21: Summary of Computations

**Certificate of Counsel**

The undersigned certifies that this Designation of Matter to be Included in the Record on Appeal complies with Rule 209(b), SCACR.

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BANNISTER, WYATT & STALVEY, LLC



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Dated: December 1, 2020

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**PROOF OF SERVICE**

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The undersigned certifies that a true copy of the foregoing:

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

**INITIAL BRIEF OF RESPONDENT**

was this 1<sup>ST</sup> day of December, e-mailed to counsel of records via the AIS e-mail on file:

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