

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Dec 09 2020

APPEAL FROM CHARLESTON COUNTY

SC Court of Appeals

Deadra L. Jefferson and Maite Murphy, Circuit Court Judges

Appellate Case No. 2019-001951
Common Pleas Case No. 2019-CP-10-0067

Alan G. Nix, Norma J. Nix, and the Estate of Norma J. NixAppellants,

v.

Churchill Park, Churchill Park Homeowner's Association, Inc., Churchill Park at Parkwest, Inc., Churchill Park at Park West Association, Inc., Southern Community Services, LLC, Park West Master Association, Inc., LPPM, Inc., McCabe, Trotter & Beverly, PC, Larry Ridlehover, Stephanie Trotter, Ryan McCabe, Jamie McSweeney, Mike Hurd, Sheri Cothran, David Brown, Catherine Brown, Stephen Sumner, Richard Riccoboni, Rick Cumberland, Park West Master Association, Inc., Park West Amenity Association, Inc., C. Richard Dobson Builders, Inc., D.R. Horton, Inc., Brian Gardner, Dodds & Hennessey LLP, Kim Atkeson, Jennifer Williamson, Jessica Turner, Kevin Steelman, Landtech Development, LLC, Landtech Incorporated of South Carolina, Land Tech Charleston, LLC, Park West Development, Inc., Rogers, Townsend Thomas, PC, Henry Munn, Individually Directors, Officers, Agents, Attorneys, Accountants, Independent Contractors, Investors, Successors, Predecessors, Parents, Subsidiaries, Sister and Affiliated entities, Partners, and Members of all named Entities . . .
.....Respondents.

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

Respondents propose the following be included in the Record on Appeal:

1. Plaintiffs' Summons and Complaint filed January 4, 2019
2. Respondents Churchill Park, improperly named as Churchill Park at Park west, Inc. and improperly named as Churchill park at Park West Association, Inc., and Stephen Sumner motion to dismiss filed May 24, 2019
3. Respondents David and Catherine Brown's motion to dismiss filed May 24, 2019
4. Order granting motion to dismiss of defendants McCabe Trotter & Beverly, PC, Stephanie Trotter, Ryan McCabe, and Jamie McSweeney filed October 17, 2019

5. Order granting defendant David Brown and Catherine Brown's motion to dismiss filed October 17, 2019
6. Order denying motion to Set Aside and Clarify filed October 17, 2019
7. Deficiency letter to Appellant from the court of appeals dated December 11, 2019
8. Transcript of record-hearing before Judge Jefferson dated September 26, 2019

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

Date: 12/9/20



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***ATTORNEY FOR RESPONDENTS
CHURCHILL PARK, IMPROPERLY NAMED
AS CHURCHILL PARK AT PARK WEST, INC.
AND IMPROPERLY NAMED AS CHURCHILL
PARK AT PARK WEST ASSOCIATION, INC.,
AND STEPHEN SUMNER***

December 9, 2020



VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: Alan Nix v. Churchill Park HOA, et al.
Case Number: 2019-CP-10-0067
Claim Number: 072-0000125-2017
LM File Number: 114-20177015

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Respondents Churchill Park and Stephen Sumner's Initial Brief and Designation of Matter in connection with the above-referenced matter. Please return a filed copy to me in the enclosed stamped envelope. Please let me know should you have any questions or need additional information.

With kindest regards, I am

Sincerely,

LUZURIAGA MIMS, LLP

A handwritten signature in blue ink, appearing to read 'Kevin W. Mims', written over the printed name.

Kevin W. Mims

KWM/mlw
Enclosures

Cc: Alan G. Nix (Via U.S. Mail only)
Andrew W. Countryman, Esquire (Via U.S. Mail only)
G. Troy Thames, Esquire (Via U.S. Mail only)