

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY

Deadra Jefferson, Circuit Court Judge  
Maite Murphy, Circuit Court Judge

Appellate Case No. 2019-001951

Alan G. Nix.....Appellant

v.

Churchill Park, Churchill Park HOA, Churchill Park Homeowners' Association, Inc., Churchill at Park West Association, Inc., Churchill Property Owners Association, Churchill Park Property Owners Association, Churchill Park at Parkwest, Inc., Churchill Park at Park West Association, Inc., Churchill Park @ Park West Association, Inc., Southern Community Services, LLC, Park West Development Corp., LPPM, Inc., McCabe, Trotter & Beverly, PC, Dobson Builders, Stephanie Trotter, Ryan McCabe, Jaime McSweeney, Larry Riddlehoover, 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., DR Horton, Inc., Brian Gardner, Venture Management of South Carolina, Inc., Dodds & Hennessey, LLP, Kim Atkeson, Jennifer Williamson, Jessica Turner, Kevin Steelman, Landtech Development, LLC, Landtech Incorporated of South Carolina, Land Tech Charleston, LLC, Rogers, Townsend & Thomas, PC, Henry Munn, Charleston County (Christine Smith), Judge Mikell Scarborough, Sandlapper Reporting, LLC, William H. Sloan, Sloan Law Firm, Individual Agents, Assigns, Attorneys, Accountants, Employees, Officers, Directors, Independent Contractors, Investors, Successors, Predecessors, Insurers, Representatives, Parents, Sister and Affiliated Entities, Partners, Members of all Persons Who Might be Liable.....Respondents.


**RESPONDENTS DAVID BROWN AND CATHERINE BROWN'S  
DESIGNATION OF MATTER FOR THE RECORD ON APPEAL**

Respondents David Brown and Catherine Brown propose to designate the following as part of the Record on Appeal:

1. Summons and Complaint, January 4, 2019;
2. Defendants David and Catherine Brown's Notice of Motion and Motion to Dismiss, May 24, 2019;
3. Memorandum in Support of Defendant David Brown and Defendant Catherine Brown's Motion to Dismiss, September 26, 2019;
4. Transcript of Record - Hearing before The Honorable Deadra L. Jefferson, September 26, 2019;
5. Order Granting Defendant David Brown and Defendant Catherine Brown's Motion to Dismiss, October 17, 2019;
6. Order Granting Motion to Dismiss of Defendants McCabe, Trotter & Beverly, PC, Stephanie Trotter, Ryan McCabe and Jamie McSweeney, October 17, 2019.

I hereby certify that this designation contains no matters irrelevant to this appeal.

WILLSON JONES CARTER & BAXLEY, P.A.



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Mt. Pleasant, South Carolina  
December 8, 2020

**ATTORNEY FOR RESPONDENTS  
DAVID BROWN AND CATHERINE BROWN**

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APPEAL FROM CHARLESTON COUNTY

Deadra L. Jefferson and Maite Murphy, Circuit Court Judges

Appellate Case No. 2019-001951

Alan G. Nix.....Appellants,

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.

PROOF OF SERVICE


The undersigned certifies that a copy of *Respondents David Brown and Catherine Brown's Designation of Matter for the Record on Appeal* has been served upon the following counsel of record by mailing a copy of the same by United States Mail, addressed as shown below this 8<sup>th</sup> day of December, 2020.

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Churchill Park Homeowners Association, Inc.*

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Countryman Law Firm  
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***Attorney for Respondents McCabe, Trotter  
& Beverly, P.C., Stephanie Trotter, Ryan  
McCabe and Jamie McSweeney***

December 8, 2020



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# WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

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December 8, 2020

**VIA US MAIL & E-MAIL**

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

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Re: Alan Nix vs. Catherine Brown & David Brown et al.  
Appellate Case No.: 2019-001951  
WJC&B File No.: 0375.00218

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Respondents David Brown and Catherine Brown'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 if you have any questions or need any additional information.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

  
G. Troy Thames

GTT/slb  
Enclosures

cc: Mr. Alan G. Nix  
Kevin W. Mims, Esquire  
Andrew W. Countryman, Esquire

slb

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THE HONORABLE JENNY ABBOTT KITCHINGS  
SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE STREET  
COLUMBIA, SC 29201