

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Mar 16 2021

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
JENNIFER B. MCCOY, CIRCUIT COURT JUDGE

Appellate Case No.
2020-001335

GENEVIEVE STRATOS, RESPONDENT,

v.

**CHARLESTON COUNTY SHERIFF'S OFFICE AND
KARMATIC, LLC, DEFENDANTS.**

OF WHICH

KARMATIC, LLC, IS THE APPELLANT.

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

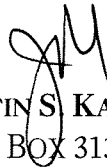
Respondent proposes the following to be included in the Record on Appeal:

1. Order of S.C. Supreme Court - January 15, 2010 re: 7.25% interest.
2. Order and Judgment August 13, 2010, filed August 16, 2010 Tideland Bank v. Southrail Enterprises, LLC, et al 2010-CP-10-139.
3. Order of Reference May 7, 2010.

4. Order December 8, 2010 Tideland Bank v. Southrail Enterprises, LLC, et al 2010-CP-10-139.
5. Order Hon. Jennifer McCoy March 9, 2020 vacating supplemental proceedings Tideland Bank v. Southrail Enterprises, LLC, et al 2010-CP-10-139.
6. Order Hon. Jennifer McCoy - September 4, 2020
7. Order and Judgment of Hon. Jennifer McCoy - September 15, 2020
8. Complaint filed January 8, 2010 by Tideland Bank 2010-CP-10-139.
9. Verified Complaint Stratos v. Charleston County Sheriff and Karmatic of August 28, 2020 and exhibits thereto.
10. Answer of Defendant Karmatic, LLC of October 26, 2020.
11. Notice and Motion for Preliminary Restraining Order and Injunction – August 31, 2020.
12. Defendant Karmatic, LLC’s Memorandum of Law in Opposition to Motion for Preliminary Restraining Order and Injunction –September 4, 2020.
13. Plaintiff Genevieve Stratos Memorandum in Support of Injunction in Form of Proposed Order – September 11, 2020.
14. Affidavit of Hon. Julie J. Armstrong – September 11, 2020.
15. Defendant Karmatic, LLC’s Supplemental Memorandum of Law in Opposition to Plaintiff’s Motion for Preliminary Restraining Order and Injunction – September 15, 2020.
16. Transcript of Hearing – September 4, 2020.
17. Transcript of Hearing – September 15, 2020.

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

KAHN LAW FIRM, LLP



JUSTIN S. KAHN

P.O. BOX 31397

CHARLESTON, SC 29417-1397

P 843.577.2128 | F 843.577.3538

JSKAHN@KAHNLAWFIRM.COM

ATTORNEYS FOR RESPONDENT STRATOS

MARCH 16, 2021

RECEIVED

Mar 16 2021

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**APPEAL FROM CHARLESTON COUNTY
JENNIFER B. MCCOY, CIRCUIT COURT JUDGE**

Appellate Case No.
2020-001335

GENEVIEVE STRATOS, RESPONDENT,

v.

**CHARLESTON COUNTY SHERIFF'S OFFICE AND
KARMATIC, LLC, DEFENDANTS.**

OF WHICH

KARMATIC, LLC, IS THE APPELLANT.

PROOF OF SERVICE

JUSTIN S. KAHN
KAHN LAW FIRM, LLP
PO BOX 31397
CHARLESTON, SC 29417-1397
P 843.577.2128 | F 843.577.3538
JSKAHN@KAHNLAWFIRM.COM
COUNSEL FOR RESPONDENT

I, Justin S. Kahn, do hereby affirm that on March 16, 2021, I served one copy of Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal on the following named individuals by email:

Elizabeth J. Palmer, Esq.
Rosen Hagood LLC
151 Meeting St., Ste. 400
Charleston, SC 29401
epalmer@rosenhagood.com
843.577.6726
Attorney for Appellant Karmatic, LLC

Edward L. Knisley, Jr., Esq.
Charleston County Attorney's Office
Lonnie Hamilton, III Public Services Building
4045 Bridge View Drive
N. Charleston, SC 29405
eknisley@charlestoncounty.org
843.958.4010
Attorneys for Charleston County Sheriff's Office

KAHN LAW FIRM, LLP



JUSTIN S. KAHN
P.O. BOX 31397
CHARLESTON, SC 29417-1397
P 843.577.2128 | F 843.577.3538
JSKAHN@KAHNLAWFIRM.COM
ATTORNEYS FOR RESPONDENT STRATOS

CHARLESTON, SC
MARCH 16, 2021

KAHN LAW FIRM, LLP

562 SAVANNAH HIGHWAY
CHARLESTON, SC 29407
WWW.KAHLAWFIRM.COM

ELLIS I. KAHN*^
JUSTIN S. KAHN*^+
WES B. ALLISON +

MAILING
P.O. Box 31397
CHARLESTON, SC 29417-1397
PHONE 843.577.2128
E-MAIL JSKAHN@KAHLAWFIRM.COM

March 16, 2021

VIA EMAIL and US MAIL

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED

Mar 16 2021

SC Court of Appeals

**Re: Genevieve Stratos v. Charleston County Sheriff's Office and Karmatic, LLC
Appellate Case No.: 2020-001335**

Dear Ms. Kitchings:

Attached for filing is Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal, along with Proof of Service. By copy of this letter I am serving these documents on all counsel in this matter.

With best regards, I am

Yours respectfully,



Justin S. Kahn

JSK/pm

Attachments

cc: Elizabeth J. Palmer, Esq. (via email only)
Edward L. Knisley, Jr., Esq. (via email only)

* SOUTH CAROLINA AND DISTRICT OF COLUMBIA

^ BOARD CERTIFIED BY THE NATIONAL BOARD OF TRIAL ADVOCACY (CIVIL PRACTICE AND CIVIL TRIAL ADVOCACY) AND
THE AMERICAN BOARD OF PROFESSIONAL LIABILITY ATTORNEYS (MEDICAL MALPRACTICE)

+ UNITED STATES COURT OF FEDERAL CLAIMS