

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JUN 24 2021

Appeal from Beaufort County
Court of Common Pleas
Carmen T. Mullen, Circuit Court Judge

SC Court of Appeals

Case No. 2019-CP-07-00223
Appellate Case No. 2020-001659

Tracey Lee Lunenburg,

Respondent,

v.

Vincent J. Aiello, Jr.,
Atlantic Heritage Builders, Inc.,
Yuko Construction, Inc., d/b/a Advanced Roofing, Inc.,
Bismark Lara, Premium Stucco, and
Shaw Manufacturing's Wrought Iron Works, Inc.,

Defendants.

Vincent J. Aiello, Jr., and
Atlantic Heritage Builders, Inc.,

Third-Party Plaintiffs,

Palatial Homes, Inc., Palatial Homes, LLC,
Palatial Homes Design, LLC, and
Palatial Building Group, LLC,

Third-Party Defendants,

Of whom Vincent J. Aiello, Jr., and
Atlantic Heritage Builders, Inc., are the

Appellants.

RESPONDENT'S DESIGNATION OF MATTER

FINN LAW FIRM. P.C.
Thomas J. Finn
P.O. Box 6003
Hilton Head Island, S.C. 29938
(843)682-3555
Thomas@finnlawfirmpc.com
Attorney for Respondent

Respondent proposes the following matter for inclusion in the Record on Appeal, but avoiding any duplication of material¹:

Orders

1. Order Granting Appellants' Motion to Stay;
2. Order Lifting Stay;

Pleadings

3. Summons and Complaint;
4. Appellants' Answers;

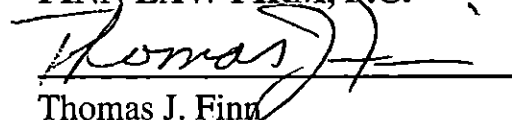
Other Material

5. Appellants' Motion to Stay;
6. Appellants' Memo in Support of Motion to Stay *with* Exhibits;
7. Plaintiff's Memo in Opposition to Appellants' Motion to Stay;
8. Affidavit of Tracey Lee Lunenburg;
9. Plaintiff's Motion to Lift Stay;
10. Appellants' Memo in Opposition to Plaintiff's Motion to Lift Stay *with* Exhibits;
11. Plaintiff's Memo in Support of Motion to Lift Stay (as to/regarding Appellants /Stay Granted on Appellants' Motion) *with* Exhibits; and
12. Notice of Appeal *with* Proof of Service.
13. Appellants Counsel's letter dated July 14, 2020.
14. Respondent's Counsel's letter dated September 15, 2020

I certify that this Designation of Matter contains no matter irrelevant to this Appeal.

Respectfully Submitted:

FINN LAW FIRM, P.C.

A handwritten signature in black ink, appearing to read "Thomas J. Finn", is written over a horizontal line.

Thomas J. Finn

P.O. Box 6003

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29938

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S.C. Bar No.: 66534

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This 22nd Day of June, 2021
Hilton Head island, South Carolina

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Tracey Lee Lunenberg,

Respondent,

v.

Vincent J. Aiello, Jr., Atlantic Heritage Builders, Inc.,
Yuko Construction, Inc., d/b/a Advanced Roofing, Inc.,
Bismark Lara, Premium Stucco, and Shaw
Manufacturing's Wrought Iron Works, Inc.,

Defendants,

Vincent J. Aiello, Jr. and Atlantic Heritage Builders, Inc.,

Third-Party
Plaintiffs,

Palatial Homes, Inc., Palatial Homes Design, LLC,
and Palatial Building Group, LLC,

Third-Party Plaintiffs,

Of Whom Vincent J. Aiello, Jr. and Atlantic Heritage
Builders, Inc. are,

Appellants.

PROOF OF SERVICE

I, Thomas J. Finn, of Finn Law Firm P.C., attorney for Respondent, hereby certify that the Respondent's Initial Brief has been served on all other parties to this appeal on June 22, 2021, via email (see attached) to their following counsel of record.

Jason Daigle, Esquire
Russell G. Hines, Esquire
Clement Rivers, LLP
PO Box 993
Charleston, SC 29402
jdaigle@ycrlaw.com
Counsel for Vincent Aiello Jr. &
Atlantic Heritage Builders, Inc.

Respectfully submitted,

FINN LAW FIRM, PC

By:



Thomas J. Finn
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South Carolina
29928
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Attorney for Respondent

This 22nd day of June, 2021
Tracey Lee Lunenberg

June 22, 2021

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

**RE: Tracey Lee Lunenberg, Respondent, v. Vincent J. Aiello, Jr. et al
Appellate Case No.: 2020-001659**

Dear Ms. Kitchings:

Enclosed for filing, please find the original and one (1) copy of the following:

- (1) Initial Brief of Respondent
- (2) Respondent's Designation of Matters to be Included in the Record on Appeal.
- (3) Proof of Service of the above documents on Appellant.

Please file the originals and return a clocked in copy to me in the enclosed self-addressed, stamped envelope. Thank You.

Very Truly Yours,



Thomas J. Finn

Enclosures

cc: Jason Daigle
Clement River, L.L.P.
25 Calhoun Street, Ste 400
Charleston, S.C. 29401
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