

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Larry B. Hyman, Judge

---

Case No: 2009-CP-26-12046

---

First American Title Insurance Company, Respondent

v.

Michele Paddy Refosco, Attorney at Law, Defendant

and

v.

Michele Paddy Refosco, Attorney at Law, Respondent

v.

AmeriSearches, LLC and Wade Schaffner, Appellants,

Appellate Case No: 2012-213001.

---

**APPELLANTS' DESIGNATION OF MATTER  
IN REPLY TO RESPONDENT REFOSCO**

---

Appellants designate for inclusion in the Record on Appeal the following material:

**RECEIVED**

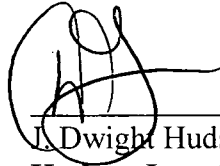
APR 16 2013

**SC Court of Appeals**

- I. All matter designated by Appellants previously
- II. All matter designated by Respondent Refosco

**CERTIFICATE**

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



\_\_\_\_\_  
J. Dwight Hudson, Esquire

**Hudson Law Offices**

1203 48th Avenue North

Suite 111

Myrtle Beach, SC 29577

(843) 692-9889

T: (843) 692-9889

F: (843) 692-9190

E: [Hudsonlaw@hudsonlawoffice.com](mailto:Hudsonlaw@hudsonlawoffice.com)

*Attorney For Appellants*

Dated: April 15, 2013

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Larry B. Hyman, Judge

---

Case No: 2009-CP-26-12046

---

First American Title Insurance Company, Respondent

v.

Michele Paddy Refosco, Attorney at Law, Defendant

and

v.

Michele Paddy Refosco, Attorney at Law, Respondent

v.

AmeriSearches, LLC and Wade Schaffner, Appellants,

Appellate Case No: 2012-213001.

---

**PROOF OF SERVICE**

---

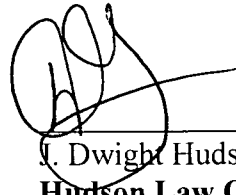
**RECEIVED**  
APR 16 2013  
SC Court of Appeals

I certify that I have served the **Appellants' Initial Brief In Reply To Respondent Refosco and Designation of Matter In Reply To Respondent Refosco** on the Respondents by depositing a copy of the same in the United States Mail, postage prepaid, on April 15, 2013, addressed and directed to Respondents via their counsel, the attorneys for respondents at the addresses noted below:

ATTORNEYS FOR RESPONDENTS:

Daniel J. MacDonald Esq.  
Rice, MacDonald, Winters & Breeden  
950 48th Ave. N, Ste., 200  
Myrtle Beach, SC 29577  
*Attorney for Michele Paddy Refosco*

W. Cliff Moore, III Esq.  
Shaun C. Blake, Esq.  
ELLIS LAWHORNE & SIMS PA  
1330 Lady St, 4th Floor  
PO Box 2285  
Columbia, SC 29202  
*Attorneys for First American Title Insurance Co.*



J. Dwight Hudson, Esquire  
**Hudson Law Offices**  
1203 48th Avenue North  
Suite 111  
Myrtle Beach, SC 29577  
(843) 692-9889  
T: (843) 692-9889  
F: (843) 692-9190  
E: [Hudsonlaw@hudsonlawoffice.com](mailto:Hudsonlaw@hudsonlawoffice.com)

Dated:  
April 15, 2013

*Attorney For Appellants*

**HUDSON LAW OFFICES**

1203 48<sup>th</sup> AVENUE NORTH  
SUITE 111

MYRTLE BEACH, SOUTH CAROLINA 29577  
TELEPHONE (843) 692-9889  
TOLL FREE: 1-877- 874-5256  
FAX (843) 692-9190  
www.hudsonlawoffice.com

SHALLOTTE OFFICE:  
5285 MAIN STREET, SUITE 21  
SHALLOTTE, NORTH CAROLINA 28459  
TELEPHONE: (910) 755-6543  
FAX (843) 692-9190  
TOLL FREE: 1-877- 874-5256

CONWAY OFFICE:  
211 LAUREL STREET, PO BOX 7  
CONWAY, SOUTH CAROLINA 29528  
TELEPHONE: (843) 248-3620  
FAX (843) 692-9190  
TOLL FREE: 1-877- 874-5256

J. DWIGHT HUDSON\*  
MARY ANNE GRAHAM  
LUCIA B. BACOT\*

EMAIL: hudsonlaw@hudsonlawoffice.com  
OR: hudsonlaw@sc.rr.com

\*ADMITTED IN S.C. AND N.C.

REPLY TO: MYRTLE BEACH OFFICE

April 15, 2013

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: First American Title v. Michele Refosco  
(Appellate Case No: 2012-213001)

Dear Ms. Kitchings:

Enclosed are the following:

- An original and a copy of Appellants Initial Brief In Reply To Respondent Refosco
- An original and a copy of Appellants Initial Designation of Matter In Reply To Respondent Refosco, including certification
- An original and a copy of a Proof of Service of the same

I ask that you please return a clocked copy of each of these documents in the Envelope enclosed for that purpose.

By copy of this letter, and by the enclosed Proof of Service, I hereby serve the same upon Respondents' counsel.

With best regards, I remain

*J. Dwight Hudson, Esq.*

J. Dwight Hudson, Esq.

JDH: mag

Enclosure(s): as stated

cc: Daniel J. MacDonald, Esq.  
W. Cliff Moore, III, Esq.  
Shaun C. Blake, Esq.

RECEIVED

APR 16 2013

SC Court of Appeals