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**Nov 29 2021**

**SC Court of Appeals**

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

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Joseph M. Strickland, Master-in-Equity

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Appellate Case No.: 2017-001795  
Civil Action No.: 2014-CP-40-01805

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Country Properties, LLC,.....Respondent,

v.

Nancy Dunn Martin,.....Appellant.

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

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Joey R. Floyd  
Wesley D. Peel  
Chelsea J. Clark  
Bruner, Powell, Wall & Mullins, LLC  
P.O. Box 61110  
Columbia, SC 29260  
(803) 252-7693  
*Attorneys for Appellant*

## **DESIGNATION OF MATTER**

Pursuant to Rule 209, SCACR, Appellant designates the following materials to be included in the Record on Appeal.

### **Orders and Judgments**

1. Consent Order of Reference, filed July 28, 2014 (J. Manning)
2. Order Denying Motion for Summary Judgment, filed November 10, 2015 (J. Strickland)
3. Final Order and Form 4, filed September 27, 2016 (J. Strickland)
4. Form 4 order denying motion to alter or amend, filed July 21, 2017 (J. Strickland)
5. Order granting new trial, filed January 28, 2019 (J. Strickland)

### **Pleadings**

6. Complaint, filed March 18, 2014
7. Answer & Counterclaim, filed May 22, 2014

### **Transcripts and Exhibits**

8. Transcript for hearing on motion for summary judgment, October 27, 2015
9. Transcript for full trial, March 21–24, 2016
  - a. Plaintiff's Exhibit 1
  - b. Plaintiff's Exhibit 2
  - c. Plaintiff's Exhibit 3
  - d. Plaintiff's Exhibit 4
  - e. Plaintiff's Exhibit 5
  - f. Plaintiff's Exhibit 6
  - g. Plaintiff's Exhibit 7
  - h. Plaintiff's Exhibit 8
  - i. Plaintiff's Exhibit 9
  - j. Plaintiff's Exhibit 10
  - k. Plaintiff's Exhibit 11
  - l. Plaintiff's Exhibit 12
  - m. Plaintiff's Exhibit 13
  - n. Plaintiff's Exhibit 14
  - o. Plaintiff's Exhibit 15
  - p. Plaintiff's Exhibit 16
  - q. Plaintiff's Exhibit 17
    - i. Blowup of legal description

- r. Plaintiff's Exhibit 18
- s. Plaintiff's Exhibit 19
- t. Plaintiff's Exhibit 20
- u. Plaintiff's Exhibit 21
- v. Plaintiff's Exhibit 22
- w. Plaintiff's Exhibit 23
- x. Plaintiff's Exhibit 24
- y. Plaintiff's Exhibit 25
- z. Plaintiff's Exhibit 26
- aa. Plaintiff's Exhibit 27
- bb. Plaintiff's Exhibit 28
- cc. Plaintiff's Exhibit 29
- dd. Plaintiff's Exhibit 30
- ee. Plaintiff's Exhibit 31
- ff. Plaintiff's Exhibit 32
- gg. Plaintiff's Exhibit 33
- hh. Plaintiff's Exhibit 34
- ii. Plaintiff's Exhibit 35
- jj. Plaintiff's Exhibit 36
- kk. Plaintiff's Exhibit 37
- ll. Plaintiff's Exhibit 38
- mm. Plaintiff's Exhibit 39
- nn. Plaintiff's Exhibit 40
- oo. Plaintiff's Exhibit 41
- pp. Plaintiff's Exhibit 42
- qq. Plaintiff's Exhibit 43
- rr. Plaintiff's Exhibit 44
- ss. Plaintiff's Exhibit 45
- tt. Plaintiff's Exhibit 46
- uu. Plaintiff's Exhibit 47
- vv. Plaintiff's Exhibit 48
- ww. Plaintiff's Exhibit 49
- xx. Plaintiff's Exhibit 50
- yy. Plaintiff's Exhibit 51
- zz. Plaintiff's Exhibit 52
- aaa. Plaintiff's Exhibit 53
- bbb. Plaintiff's Exhibit 54
- ccc. Plaintiff's Exhibit 55
- ddd. Defendant's Exhibit 1
- eee. Defendant's Exhibit 2
- fff. Defendant's Exhibit 3
- ggg. Defendant's Exhibit 4
- hhh. Defendant's Exhibit 5
- iii. Defendant's Exhibit 6
- jjj. Defendant's Exhibit 7
- kkk. Defendant's Exhibit 8
- lll. Defendant's Exhibit 9

- mmm. Defendant's Exhibit 10
- nnn. Defendant's Exhibit 11
- ooo. Defendant's Exhibit 12
- ppp. Court's Exhibit 1 (excluding exhibits to deposition transcript)

10. Transcript for motion to alter or amend, January 26, 2017

**Other Materials or Documents**

11. Defendant's Notice of Motion and Motion for Summary Judgment, filed September 14, 2015

- a. Defendant's Memorandum in Support of Motion for Summary Judgment, filed September 14, 2015

12. Plaintiff's proposed order denying motion for summary judgment, cover letter dated November 5, 2015

13. Defendant's Pre-Trial Brief, filed March 18, 2016

14. Plaintiff's four proposed final orders, cover letter dated May 11, 2016

15. Defendant's Notice of Motion and Motion to Alter or Amend pursuant to Rules 59(e) and 52(b), SCRCF, filed November 9, 2016

- a. Defendant's Memorandum in Support of Defendant's Motion to Alter or Amend, filed January 29, 2017

16. Defendant's Notice of Motion and Motion for Relief from Judgment, filed October 24, 2017

17. Plaintiff's Motion to Alter or Amend Order Granting Defendant's Rule 60(b) Motion, filed February 6, 2019

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**CERTIFICATION OF COUNSEL**

In accordance with Rule 209(c), SCACR, the undersigned counsel certifies that this Designation of Matter contains no matter which is irrelevant to the appeal.

Respectfully submitted,

**BRUNER, POWELL, WALL & MULLINS, LLC**

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*s/ Chelsea J. Clark*  
Joey R. Floyd, Bar No. 68491  
Wesley D. Peel, Bar No. 9283  
Chelsea J. Clark, Bar No. 102211  
Post Office Box 61110 (29260)  
1735 St. Julian Place, Suite 200 (29204)  
Columbia, South Carolina  
(803) 252-7693  
[jfloyd@brunerpowell.com](mailto:jfloyd@brunerpowell.com)  
[wpeel@brunerpowell.com](mailto:wpeel@brunerpowell.com)  
[cclark@brunerpowell.com](mailto:cclark@brunerpowell.com)  
*Attorneys for Appellant Nancy Martin*

Columbia, South Carolina  
November 29, 2021