

RECEIVED

Jan 04 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2021-000851

ARO-D Enterprises, LLC Respondent,

v.

Tiger Enterprises & Trading, Inc., Bonnie Walker and
Dwight Walker Appellants,

Tiger Enterprises & Trading, Inc., Third-Party Plaintiff / Appellant,

v.

Rudy A. Dixon, Frank T. Gangi, and
T3 Aviation, LLC Third-Party Defendants / Respondents.

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

J.J. Andrighetti (S.C. Bar No. 0072741)
Culbertson Andrighetti, LLC
10 Williams Street
Greenville, South Carolina 29601
(o) 864.370.8222
(e) jj@palmettolawfirm.com

*Attorney for Respondent ARO-D Enterprises, LLC and
Respondent Rudy A. Dixon*

Steven Edward Buckingham (S.C. Bar No. 0075089)
The Law Office of Steven Edward Buckingham
16 Wellington Avenue
Greenville, South Carolina 29609
(o) 864.735.0832
(e) seb@buckingham.legal

*Attorney for Respondent T3 Aviation, Inc. and
Respondent Frank T. Gangi*

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

I. ORDERS / JUDGMENTS / DECISIONS

- A. Order Dated Apr. 16, 2021, by which the Trial Court Granted the Motion for Partial Summary Judgment of Respondent ARO-D Enterprises, LLC
- B. Order Dated Apr. 16, 2021, by which the Trial Court Granted the Motion for Partial Summary Judgment of Respondents T3 Aviation, Inc. and Frank T. Gangi
- C. Form 4 Order Dated July 6, 2021, by which the Trial Court Denied Appellant's Motion to Alter or Amend the Orders of Apr. 16, 2021

II. PLEADINGS

- A. Complaint of Respondent ARO-D Enterprises, LLC filed on Mar. 27, 2020
- B. Answer of Appellants to the Complaint, including the assertion of a Counterclaim against Respondent ARO-D Enterprises, LLC, as well as a Third-Party Complaint filed by Appellant Tiger Enterprises & Trading, Inc. against Respondents Rudy A. Dixon, Frank T. Gangi, and T3 Aviation, Inc. (which has been misidentified as T3 Aviation, LLC), filed on Apr. 27, 2020
- C. Reply of Respondent ARO-D Enterprises, LLC to Appellants' Counterclaim, and Answer of Respondent Rudy A. Dixon to the Third-Party Complaint, filed on May 28, 2020
- D. Answer of Respondent T3 Aviation, Inc. to the Third-Party Complaint, as well as a Counterclaim against Appellant Tiger Enterprises & Trading, Inc., filed on Sept. 2, 2020
- E. Answer of Respondent Frank T. Gangi to the Third-Party Complaint, as well as a Counterclaim against Appellant Tiger Enterprises & Trading, Inc., filed on Sept. 2, 2020
- F. Reply of Appellant Tiger Enterprises & Trading, Inc. to the Counterclaim of T3 Aviation, Inc., filed on Oct. 7, 2020
- G. Reply of Appellant Tiger Enterprises & Trading, Inc. to the Counterclaim of Frank T. Gangi, filed on Oct. 7, 2020

III. TRANSCRIPTS

- A. Transcript of Hearing Held on Mar. 9, 2021

IV. OTHER MATERIALS OR DOCUMENTS

- A. Affidavit of Dwight Walker, filed without attachments on June 10, 2020
- B. Motion for Partial Summary Judgment of Respondent ARO-D Enterprises, LLC filed on Dec. 30, 2020 with the following attachments:
 - i. Affidavit of Respondent Rudy A. Dixon Dated Mar. 5, 2020
 - ii. Excerpts of the Deposition Testimony of Dan Hansen, Taken on Aug. 14, 2020
- C. Motion for Partial Summary Judgment of Respondents T3 Aviation, Inc. and Frank T. Gangi, filed on Feb. 12, 2021
- D. Motion to Alter or Amend the Orders of Apr. 16, 2021 Granting Partial Summary Judgment to Respondents, filed on Apr. 26, 2021 with the following attachments:
 - i. Proposed Letter Agreement of July 24, 2019
 - ii. Email from Respondent Rudy A. Dixon of July 31, 2019
 - iii. Email from Respondent Rudy A. Dixon to Respondent Frank T. Gangi of Aug. 5, 2019
- E. Memorandum of Respondent ARO-D Enterprises, LLC to Appellants' Motion to Alter or Amend, filed on June 1, 2021, with the following attachments:
 - i. Email from Appellant Bonnie Walker to Respondent Rudy A. Dixon of Sept. 18, 2019
 - ii. Email from Michele Dickstein to Appellants and Their Legal Counsel of Mar. 13, 2020
 - iii. Proposed Consignment Agreement of June 25, 2019
- F. Memorandum of Appellants in Support of the Motion to Alter or Amend, filed on June 25, 2021, with the following attachments:
 - i. Request for Admission Propounded by Appellants to Respondent ARO-D Enterprises, LLC on Mar. 25, 2021
 - ii. Response to Request for Admission of Respondent ARO-D Enterprises, LLC on Apr. 26, 2021
 - iii. Requests for Admission Propounded by Appellants to Respondent Rudy A. Dixon on June 2, 2021
 - iv. Email from Appellants to Respondent Frank T. Gangi of July 30, 2019
 - v. Copy of an Opinion in PPUC Pa. PUC v. Gangi, No. 16-1048 (1st Cir. Oct. 17, 2017)

G. Appellants' Notice of Appeal, filed on Aug. 3, 2021

V. CERTIFICATION

Consistent with Rule 209, SCACR, the undersigned counsel for Respondents hereby certify that the foregoing designation contains no matter which is irrelevant to the appeal.

Respectfully,

s/ J.J. Andrighetti

J.J. Andrighetti (S.C. Bar No. 0072741)
Culbertson Andrighetti, LLC
10 Williams Street
Greenville, South Carolina 29601
(o) 864.370.8222
(e) jj@palmettolawfirm.com

*Attorney for Respondent ARO-D Enterprises, LLC and
Respondent Rudy A. Dixon*

s/ Steven Edward Buckingham

Steven Edward Buckingham (S.C. Bar No. 0075089)
The Law Office of Steven Edward Buckingham
16 Wellington Avenue
Greenville, South Carolina 29609
(o) 864.735.0832
(e) seb@buckingham.legal

*Attorney for Respondent T3 Aviation, Inc. and
Respondent Frank T. Gangi*

Greenville, South Carolina
January 4, 2022