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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea Gist Benjamin, Circuit Court Judge

Appellate Case No. 2021-000641

Stonington Community Association, Inc.Respondent,

V.

Carl D. Taylor, Jonathan Stevens, Veronica Stevens, Lena M. Bretous, Vickie M. Wise, Gerald Maynard, Lisa Maynard, Reginald Dalton, Donna Dalton, Thomas Lafayette Brown a/k/a Thomas L. Brown, Sharline Brown, Derrick L. Taylor, Gaye S. Taylor, Syrecea Parker, Carolyn L. Austin, Richea G. House, Sr., Gayle D. House, Larkin Hancock, Jr., Katrina Hancock, Jeffery M. Farmer, Kelly S. Farmer, Anthony T. Reddish, Diann Reddish, Joel H. Daley, Syreta L. Daley, Judy Dove, Henry Faison, Dorothy Brisbon, George L. Lawrence, Annette M. Lawrence, Devinci L. Fulton, and John A Francis, Defendants,

of whom Carl D. Taylor, Lena M. Bretous, Vickie M. Wise, Gerald Maynard, Lisa Maynard, Derrick L. Taylor, Gaye S. Taylor, Syrecea Parker, Richea G. House, Sr., Gayle D. House, Devinci L. Fulton, and John A. Francis are theAppellants.

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

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

1. 12/18/18: Lis Pendens
2. 12/17/18: Summons
3. 12/17/18: Complaint
 - a) Exhibit A – Property Description

- b) Exhibit B – Amended Declaration
- 4. 1/16/19: Answer and Counterclaim of Certain Defendants
- 5. 7/22/20: Plaintiff's Motion for Summary Judgment on Defendants' Counterclaim for Abuse of Process
- 6. 8/27/20: Plaintiff's Notice of Motion for Partial Summary Judgment
- 7. 10/19/20: Plaintiff's Memorandum in Support of its Motion for Partial Summary Judgment
 - a) Exhibit A – Boundary Plat
 - b) Exhibit B – Richland Planning Commission Letter
 - c) Exhibit C- Stonington Descriptive Statement
 - d) Exhibit D – Sketch Plan
 - e) Exhibit E – Stonington Phase I Plat
 - f) Exhibit F – Original Stonington Declaration
 - g) Exhibit G – Stonington Phase II Plats
 - h) Exhibit H – Overall Site Plan
 - i) Exhibit G – Amended Stonington Declaration
 - j) Exhibit I – 2005 Stonington Development, LLC Letter to Stonington Residents
 - k) Exhibit J – Affidavit of David Hilburn (and exhibits thereto)
 - l) Exhibit L – Stonington photos
 - m) Exhibit M – 2015 Lawsuit Documents
- 8. 10/20/20: Plaintiff's Memorandum in Support of its Motion for Summary Judgment Against Counterclaim of Defendants
- 9. 12/31/2020 Plaintiff's Memorandum in Support of its Motion for Summary Judgment Against Counterclaim of Defendants
- 10. 1/4/21: (Defendants') Memorandum in Opposition to Plaintiff's Motion for Summary Judgment
 - a) Exhibit A – 2009 Lawsuit Documents
 - b) Exhibit B – Original Stonington Declaration
 - c) Exhibit C – Amended Stonington Declaration
 - d) Exhibit D – Foreclosure Deed
 - e) Exhibit E – Supplemental Declaration adding Lot 32
 - f) Exhibit F – 2017 Stonington Letter to Residents
 - g) Exhibit G – D. Ryan McCabe, Jr., Esq. Opinion Letter
 - h) Exhibit H – Conditional Consent for Lot 2 to be Bound by Declaration
- 11. 1/8/21: FORM 4 Order
- 12. 1/13/21 (Plaintiff's) Supplemental Memorandum in Support of Plaintiff's Motion for Partial Summary Judgment
- 13. 3/15/21 Plaintiff's Second Supplemental Memorandum in Support of Plaintiff's Motion for Partial Summary Judgment
 - a) Exhibit A – Affidavit of Stephen Lipscomb
- 14. 3/31/21: (Defendants') Supplemental Memorandum in Opposition to Plaintiff's Motion for Summary Judgment
- 15. 4/1/21: Order Granting Plaintiff's Motion Partial Summary Judgment
- 16. 4/12/21: (Defendants') Notice of Motion and Motion Pursuant to Rule 59(e), SCRPC, to Alter or Amend
- 17. 5/6/21: (Plaintiff's) Memorandum in Opposition to Defendants' Motion to Alter or Amend

18. 5/10/21: (Defendants') Reply Memorandum in Support of Defendants' Motion Pursuant to Rule 59(e), SCRPC To Alter or Amend the Judgment
19. 5/28/21: Amended Order Granting Plaintiff's Motion for Partial Summary Judgment and Motion for Summary Judgment as to Defendants' Counterclaim
20. 6/15/21: (Defendants') Notice of Appeal of 5/28/21 Amended Order

All of the listed documents to be included in the Record on Appeal shall include any and all exhibits attached to said document and filed with the trial court. I certify that this Designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

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February 4, 2022
Columbia, South Carolina