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Mar 25 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen Mullen, Circuit Court Judge

Case No. 2019-CP-07-00117
Appellate Case No. 2021-000862

Zachary Z. Zoul and Zoul Hospitality, LLC d/b/a Hospitality Advisors Group,
Respondents,

v.

Lawrence Leary and Old Town Bluffton, LLC, Appellants.

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

Respondents acknowledge Appellants' Corrected Designation of Matter to be included in the Record on Appeal. The Respondents propose the following additions to be included in the Designation of Matter to be included in the Record on Appeal except to the extent it is duplicative to Appellants' Designation.

1. Respondents' Complaint.
2. Plaintiffs' Memorandum of Points and Authorities In Opposition to Defendants' Motion to Alter/Amend Judgment, Motion for a New Trial and Motion to reconsider.
3. Plaintiffs' Notice of Motion and Motion to Quash or Grant Plaintiffs a Protective Order From Defendants' Last Minute Deposition to be Used at Trial.
4. Order filed in Beaufort County Court of Common Pleas May 15, 2020, ruling on Respondents' and Appellants' Motions for Summary Judgment.
5. Plaintiffs' Notice of Motion and Motion for Summary Judgment (with exhibits).

6. Plaintiffs' Memorandum of Points and Authorities in Support of Motion for Summary Judgment (with any exhibits).
7. Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment.
8. Plaintiffs' Memorandum of Points and Authorities in Opposition to Defendants' Motion to Dismiss.
9. Plaintiffs' Trial Exhibits 1-24.
10. All of Appellants' Designations of Matter in the Record on Appeal (original or corrected).

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

JONES, SIMPSON & NEWTON, P.A.

By: /s/ F. Ward Borden
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Attorneys for the Respondents

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v.

Lawrence Leary and Old Town Bluffton, LLC, Appellants.

PROOF OF SERVICE

I, F. Ward Borden, on this 25th day of March, 2022, served the attached Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal via First Class Mail, to all counsel of record as follows: Gregory Michael Galvin, Esq., GALVIN LAW GROUP, LLC, P.O. Box 887, Bluffton, SC 29910.

JONES, SIMPSON & NEWTON, P.A.

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March 25, 2022

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THIS CORRESPONDENCE ORIGINATED AT THE BLUFFTON OFFICE

March 25, 2022

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SC Court of Appeals

Via E-Mail; (ctappfilings@sccourts.org)

Jenny Abbott Kitchings, Clerk
S.C. Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Zoul, et al. v. Leary, et al.; Appellate Case 2021-000862; Respondents' Initial Brief

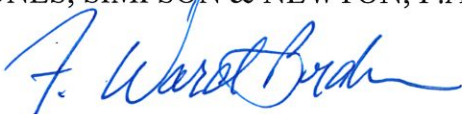
Dear Ms. Kitchings:

Please find enclosed the Initial Brief of Respondents, Designation of Matter to be Included in the Record on Appeal, and copy of Proof of Service, all in connection with the above-referenced case. By way of U.S. Mail under a copy of this transmittal, I am serving a copy of the referenced documents to Appellants' counsel, Gregory Michael Galvin, Esquire.

If there are problems, errors or shortcomings with our enclosures, please contact me. Thank you for your assistance.

Respectfully,

JONES, SIMPSON & NEWTON, P.A.



F. Ward Borden

Enclosures

cc: Gregory Michael Galvin, Esq. (w/encl.)