

**RECEIVED**

**May 04 2022**

**SC Court of Appeals**

**FORM 14  
DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

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

\_\_\_\_\_  
**APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas**  
The Honorable Donald B. Hocker, Circuit Court Judge

\_\_\_\_\_  
**Case No.: 2021-CP-40-00206  
Appellate Case No.: 2022-000030**

Rumsey Construction & Renovation, LLC dba Rumsey Construction  
& Restoration, .....*Appellant,*

v.

Thomas and Stacy Lanham, .....*Respondents.*

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

Appellant proposes that the following be included in the Record on Appeal:

1. Order of Dec. 9, 2021;
2. Complaint;
3. Motion to Compel;
4. Exhibit A to Motion to Compel – Services Contract;
5. Affidavit of Stacy Lanham;
6. Transcript of Proceedings, dated Oct. 27, 2021;

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

Respectfully submitted,



---

**THE WARD LAW FIRM, P.A.**

John E. Rogers, II, (SC Bar #72779)

T. Jonathan Clark (SC Bar #102672)

P.O. Box 5663

Spartanburg, SC 29304

(864) 591-2366

(864) 585-3090 (fax)

Email: [jrogers@wardfirm.com](mailto:jrogers@wardfirm.com)

[jclark@wardfirm.com](mailto:jclark@wardfirm.com)

AND

*s/ H. Freeman Belser, with permission*

---

**BELSER & BELSER, P.A.**

H. Freeman Belser, Esquire

Post Office Box 96

Columbia, South Carolina 29202

(803) 929-0096

Email: [freeman@belsarpa.com](mailto:freeman@belsarpa.com)

*Attorneys for Appellant Rumsey*

*Construction & Restoration, LLC dba*

*Rumsey Construction & Restoration*

May 4, 2022

**RECEIVED**

**May 04 2022**

**SC Court of Appeals**

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

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

---

Case No.: 2021-CP-40-00206

---

Rumsey Construction & Renovation, LLC dba Rumsey Construction  
& Restoration, .....Appellant,

v.

Thomas and Stacy Lanham, .....Respondents,

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies that on April 22, 2022, it served the foregoing Initial Brief of Appellant Rumsey Construction & Renovation, LLC dba Rumsey Construction & Restoration and Designation of Matter to be Included in the Record on Appeal via email (attached hereto as Exhibit A) and via the US Postal Service, containing the above-referenced document to all counsel of record's individual AIS email addresses pursuant to the SC Supreme Court COVID Order 2020-05-29-02. A list of counsel served is as follows:

Joshua P. Cantwell, Esquire  
Cantwell Law Firm, LLC  
PO Box 600  
Charleston, SC 29402  
843-801-4104  
[josh@cantwelllawfirm.org](mailto:josh@cantwelllawfirm.org)

(SIGNATURE PAGE TO FOLLOW)

By:

**THE WARD LAW FIRM, P.A.**

*s/T. Jonathan Clark*

John E. Rogers, II, (SC Bar No.: 72779)

T. Jonathan Clark (SC Bar No.: 102672)

P.O. Box 5663

Spartanburg, SC 29304

(864) 591-2366

(864) 585-3090 (fax)

Email: [jrogers@wardfirm.com](mailto:jrogers@wardfirm.com)

[jclark@wardfirm.com](mailto:jclark@wardfirm.com)

AND

**BELSER & BELSER, P.A.**

H. Freeman Belser, Esquire

1325 Park St, Ste 300 (29201)

Post Office Box 96

Columbia, South Carolina 29202

(803) 929-0096

[freeman@belsarpa.com](mailto:freeman@belsarpa.com)

*Attorneys for Appellant Rumsey  
Construction & Restoration, LLC dba  
Rumsey Construction & Restoration*

May 4, 2022

## Sherry Santana

---

**From:** Sherry Santana  
**Sent:** Wednesday, May 4, 2022 4:01 PM  
**To:** 'josh@cantwelllawfirm.org'  
**Cc:** John Rogers; Jonathan Clark; 'freeman@belsarpa.com'; Kirby Parham; Angela Highhouse  
**Subject:** Rumsey Construction v. Thomas and Stacy Lanham - Appeal - Initial Brief  
**Attachments:** Certificate of Counsel - Initial Brief.pdf; Appellant Rumsey's Initial Brief.pdf; Proof of Service of Rumsey's Initial Brief & Design of Matter.pdf; Ct App Clerk - Deficiency Resolution letter.pdf; Designation of Matter to be Included in Record.pdf

Mr. Cantwell,

Attached please find a copy of the correspondence to the Chief Deputy Clerk, a copy of the Initial Brief of Appellant Rumsey Construction & Renovation, LLC dba Rumsey Construction & Restoration, a copy of the Designation of Matter to be Included in the Record, a copy of the Proof of Service and a copy of the Certificate of Counsel, pertaining to the above-referenced Appeal. A hard copy of the attached has also been placed in the out-going mail. The attached is being filed today with the Court of Appeals.

Best regards,

Sherry

Sherry Santana  
Paralegal to John E. Rogers, II  
The Ward Law Firm  
PO Box 5663  
Spartanburg, SC 29304  
864-327-3050  
864-591-2366 (Rogers)  
864-585-3090 - Facsimile  
ssantana@wardfirm.com

*In light of the April 3, 2020 Order of the South Carolina Supreme Court (Order 2020-04-03-01), we will be serving discovery and motions via email only. If you would like a hard copy, please let us know.*

This e-mail and the information transmitted contains PRIVILEGED and CONFIDENTIAL information and is the property of the sender. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this information, or the taking of any action in reliance on the content of this information, is strictly prohibited. If you have received this

e-mail in error, please immediately contact The Ward Law Firm, PA at (864) 573-8500 and please delete the original transmittal of this information.

THE WARD LAW FIRM, P.A.

ATTORNEYS AT LAW  
POST OFFICE BOX 5663  
SPARTANBURG, SOUTH CAROLINA 29304

RECEIVED

May 04 2022

SC Court of Appeals

K. LINDSAY TERRELL♦♦  
ROBERT E. DAVIS\*  
JOHN E. ROGERS, II\*  
C. REED TEAGUE  
CHAD M. GRAHAM  
T. JONATHAN CLARK\*  
J. CHRISTIAN GREENE\*

♦ CERTIFIED MEDIATOR  
\* ALSO MEMBER NORTH CAROLINA BAR  
• ALSO MEMBER GEORGIA BAR

RUFUS M. WARD (1908-1988)  
L. PAUL BARNES (1931-1986)  
JAMES W. HUDGENS (1940-2017)

233 SOUTH PINE STREET  
SPARTANBURG, S.C. 29302  
FAX. No. (864) 585-3090  
OFFICE No. (864) 573-8500

E-mail: [jrogers@wardfirm.com](mailto:jrogers@wardfirm.com)  
Direct No. 864-591-2366

May 4, 2022

Ms. V. Claire Allen, Chief Deputy Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

**Re: *Thomas and Stacy Lanham vs. Rumsey Construction & Renovation, LLC dba Rumsey Construction & Restoration***  
**Appellate Case No. 2022-000030**

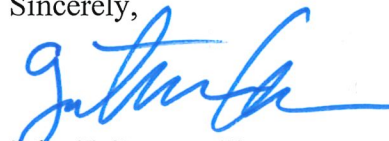
Dear Ms. Allen:

We are in receipt of the two deficiency letters dated April 25, 2022. With this letter, please allow us to address the deficiencies listed, in efforts to resolve those matters. The deficiencies can be addressed and resolved as follows, to wit:

- (1) As it pertains to the Motion for Extension of Time, Appellant has submitted its Initial Brief to the Court, and no settlement negotiations are ongoing at this time. As such, please consider the Motion to be **withdrawn**.
- (2) As it pertains to the designation of matter to be included in the record on appeal as required by Rule 209, SCACR, please see attached for same, along with an attached copy of all designated documents.

We trust this addresses the listed deficiencies. Please advise if you have any additional questions or concerns.

Sincerely,



John E. Rogers, II  
T. Jonathan Clark

cc: Mr. Joshua P. Cantwell, Esquire  
Mr. H. Freeman Belser, Esquire