

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

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@belserpa.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

(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

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@belserpa.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@belserpa.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
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

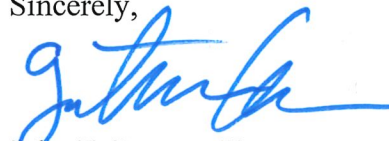
Dear Ms. Allen:

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