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May 11 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Civil Court Appeal Case No. 2021-CP-08-00513

Appellate Case No. 2021-000768

Aracelis Santos, Appellant,

v.

Harris Investment Holdings, LLC, Respondent.

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

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondent Harris Investment Holdings, LLC respectfully requests that the following items be included in the Record on Appeal:

ORDERS

1. Order granting Respondent's application for ejectment in Magistrate Court Case Nos. 2016-CV-08-10605290 and 2017-CV-08-10600019 dated December 7, 2017
2. Order awarding Respondent its attorney's fees in Magistrate Court Case Nos. 2016-CV-08-10605290 and 2017-CV-08-10600019 dated February 9, 2018
3. Order setting the Appeal Bond as modified in Magistrate Court Case Nos. 2016-CV-08-10605290 and 2017-CV-08-10600019 dated May 17, 2018
4. Orders dismissing the second appeal in Circuit Court Case No. 2018-CP-08-01008 dated June 6, 2019
5. Order affirming the magistrate's orders in Circuit Court Case No. 2018-CP-08-00266 dated June 6, 2019

6. Form 4 Order granting Respondent's Motion to Dismiss in Circuit Court Case No. 2021-CP-08-00513 dated June 14, 2021
7. Order denying Appellant's Motion for Reconsideration in Circuit Court Case No. 2021-CP-08-00513 dated June 29, 2021

TRANSCRIPTS

8. Transcript of Hearing in Circuit Court Case No. 2021-CP-08-00513 dated June 3, 2021

PLEADINGS

9. Application for Ejectment in Magistrate Court Case No. 2016-CV-08-10605290 dated November 14, 2016
10. Appellant's Complaint in Circuit Court Case No. 2021-CP-08-00513 dated March 2, 2021

MOTIONS AND SUPPORTING MEMORANDA

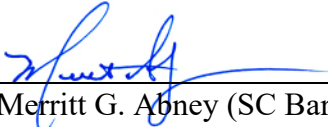
11. Respondent's Motion to Dismiss and all exhibits thereto in Circuit Court Case No. 2021-CP-08-00513 dated April 2, 2021
12. Respondent's Memorandum in Support of its Motion to Dismiss and all exhibits thereto in Circuit Court Case No. 2021-CP-08-00513 dated May 25, 2021
13. Appellant's Memorandum of Law in opposition to Respondent's Motion to Dismiss and all exhibits thereto in Circuit Court Case No. 2021-CP-08-00513 dated May 27, 2021
14. Appellant's Motion for Reconsideration and all exhibits thereto in Circuit Court Case No. 2021-CP-08-00513 dated June 15, 2021

OTHER MATERIALS OR DOCUMENTS

15. The lease agreement between Appellant and Respondent dated December 15, 2015
16. Letter from Merritt Abney providing notice directing Appellant to vacate dated October 16, 2018
17. Letter from Merritt Abney providing second notice directing Appellant to vacate dated February 26, 2019
18. Circuit Court Docket Sheet reflecting entry showing circuit court declined to sign Respondent's proposed order in Circuit Court Case No. 2021-CP-08-00513 dated July 6, 2021

The undersigned counsel hereby certifies, pursuant to Rule 209(c) of the South Carolina Appellate Court Rules that this Designation contains no matter that is irrelevant to the appeal.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
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Attorneys for Respondent, Harris Investment Holdings, LLC

Charleston, South Carolina
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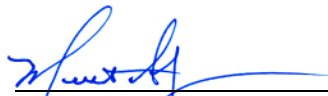
PROOF OF SERVICE

I hereby certify that I have served a copy of **Respondent’s Designation of Matter to Be Included in the Record on Appeal** on counsel for Appellant Aracelis Santos in this action by mailing a copy of the same by United States Mail, postage prepaid, and via electronic mail, to the following AIS information address(es):

Counsel Served:

Thomas R. Goldstein, Esq.
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Merritt G. Abney

May 11, 2022

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SC Court of Appeals

Via E-mail (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
PO Box 11629
Columbia, SC 29211

RE: Aracelis Santos v. Harris Investment Holdings, LLC, et al.
Appellate Case No. 2021-000768
Our File No.: 020766/01513

Dear Ms. Kitchings:

Please find enclosed for electronic filing in the above matter, the Respondent's Initial Brief, Designation of Matter to Be Included in the Record on Appeal and Proofs of Service. We ask that, at your convenience, you return a copy of the attached documents to us bearing the Court's file stamp.

By copy of this letter to all counsel, we are hereby serving them with a copy of each of the above documents.

Thank you for your assistance, and please do not hesitate to contact us should the Court require any additional information.

Very truly yours,



Merritt G. Abney

MGA:ls

Enclosures

cc: Thomas R. Goldstein, Esq.
Stafford J. McQuillin, III, Esq. (*all via E-mail and U.S. Mail*)