

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
MAY 27 2022
SC Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

The Honorable Robert E. Hood., Circuit Court Judge
Case No. 2018-CP-26-06033

Appellate Case No. 2022-000031

Royal Garden Resort Regime Homeowners Association, Inc.. Respondent

vs.

Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson;
and Phoenix of the Strand, Inc..... Appellants

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

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

1. Order Granting Plaintiff’s Motion to Allow Entry September 15, 2021
2. Form 4 Order Denying Defendants’ Motion to Reconsider December 30, 2021
3. Order of the Circuit Court December 21, 2018
4. Transcript of Hearing August 4, 2021 (on Plaintiff’s Motion to Allow Entry)
5. Plaintiff’s Motion to Allow Entry April 28, 2021
6. Royal Garden Resort Master Deed
7. Affidavit of Stephen Hunt, Sr. August 2, 2021
8. Affidavit of Stephen Hunt, Sr. September 28, 2021

9. Affidavit of Daniel W. Stacy, Jr. August 9, 2019
10. Supplemental Affidavit of Daniel W. Stacy, Jr. April 21, 2019
11. Supplemental Affidavit of Daniel W. Stacy, Jr. July 30, 2021
12. Affidavit of Harold Outz August 2, 2021
13. Defendants' Motion to Reconsider September 21, 2021
14. Plaintiff's Response in Opposition to Defendant's Motion to Reconsider October 13, 2021
15. Time Warner Cable Communications Easement filed February 7, 2006
16. Third Amended Complaint July 28, 2020

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

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
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Attorney for Respondents

May 25, 2022
Surfside Beach, South Carolina

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Royal Garden Resort Regime Homeowners Association, Inc.. Respondent

vs.

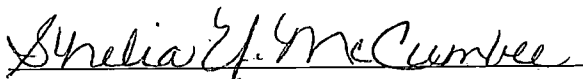
Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson;
and Phoenix of the Strand, Inc..... Appellants

PROOF OF SERVICE


PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Respondents' Designation of Matter** on the 25th day of May, 2022 by depositing a copy of same in the United States Mail, postage prepaid, to:

Douglas M. Zayicek, Esquire
Holly M. Lusk, Esquire
Bellamy, Rutenberg, Copeland, Epps,
Gravely & Bowers, P.A.
P.O. Box 357
Myrtle Beach, SC 29578

Kirby D. Shealy III, Esquire
Luke M. Allen, Esquire
Adams and Reese LLP
PO Box 2285
Columbia, SC 29202


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 25th day of May, 2022.


Notary Public for South Carolina
My Commission Expires: 1.22.29

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

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SC Court of Appeals

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

May 25, 2022

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appellate Case No. 2022-000031
Royal Garden Resort Regime Homeowners Association, Inc. v. Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson; and Phoenix of the Strand, Inc.
C/A No. 2018-CP-26-06033
Our File No. 2018-0334C

Dear Ms. Kitchings:

Enclosed please find the following for filing in the above-captioned matter: (1) Initial Brief of Respondent, with Proof of Service; and (2) Respondent's Designation of Matter to be Included in Record on Appeal, with Proof of Service.

Please be so kind as to return a filed copy of the Proof of Service of each document in the self-addressed, stamped envelope provided for your convenience.

By copy of this letter, we hereby serve the above-stated documents on Appellants through counsel of record

Should you have any question or need anything further at this time, please do not hesitate to contact me.

Sincerely yours,



Gene M. Connell, Jr.

GMCJr:sm
Enclosures
cc w/enc:

Douglas M. Zayicek, Esquire
Holly M. Lusk, Esquire
Kirby D. Shealy III, Esquire
Luke M. Allen, Esquire

KELAHER, CONNELL & CONNOR, PC
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