

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 16 2022

SC Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas  
Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2022-000131  
Case Nos. 2020-CP-21-1297/1296

Walter Parker .....Plaintiff/Appellant,

v.

Florence Carpet & Tile, Inc., John Curl, and Mike Barker .....Defendants/Respondents,

AND

Allison Parker .....Plaintiff/Appellant;

v.

Florence Carpet & Tile, Inc., John Curl, and Mike Barker .....Defendants/Respondents,

**PLAINTIFFS/APPELLANTS' DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Plaintiffs/Appellants propose to include the following in the Record on Appeal:

1. Complaint (Walter Parker) filed on May 19, 2020
2. Complaint (Allison Parker) filed on May 19, 2020
3. Answer (Walter Parker) filed on August 3, 2020
4. Answer (Allison Parker) filed on August 3, 2020
5. Defendant Barker's Motion for Summary Judgment with Memorandum and Affidavits (Walter Parker) filed on August 27, 2021.
6. Defendant Barker's Motion for Summary Judgment with Memorandum and Affidavits (Allison Parker) filed on August 27, 2021

7. Defendant Curl's Motion for Summary Judgment with Memorandum and Affidavits (Walter Parker) filed on August 27, 2021
8. Defendant Curl's Motion for Summary Judgment with Memorandum and Affidavits (Allison Parker) filed on August 27, 2021
9. Plaintiff Walter Parker's Response in Opposition to Motion for Summary Judgment with Exhibits, Deposition Transcript Excerpts, and Affidavits filed on November 1, 2021
10. Plaintiff Allison Parker's Response in Opposition to Motion for Summary Judgment with Exhibits, Deposition Transcript Excerpts, and Affidavits filed on November 1, 2021
11. Transcript of Record of November 3, 2021 Hearing
12. Order Granting Summary Judgment (Walter Parker) filed on December 2, 2021
13. Order Granting Summary Judgment (Allison Parker) filed on December 2, 2021
14. Plaintiff's Motion to Alter or Amend Judgment (Walter Parker) filed on December 9, 2021
15. Plaintiff's Motion to Alter or Amend Judgment (Allison Parker) filed on December 9, 2021
16. Order Denying Motion to Reconsider (Walter Parker) filed on January 28, 2022
17. Order Denying Motion to Reconsider (Allison Parker) filed on January 28, 2022

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

WILLCOX, BUYCK & WILLIAMS, P.A.

By: s/ J. Scott Kozacki  
J. Scott Kozacki  
SC Bar No. 64137  
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*Attorney for Appellants*

June 14, 2022  
Florence, South Carolina

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**PROOF OF SERVICE**

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I certify that I have filed the Plaintiff/Appellant's Designation of Matter to be Included in the Record on Appeal on the Respondents by depositing a copy of the Plaintiff/Appellant's Designation of Matter to be Included in the Record on Appeal in the United States Mail, postage prepaid, on the 14<sup>th</sup> day of June, 2022, addressed to their attorney of record, as follows:

Jeffrey L. Payne, Esq.  
Turner, Padget, Graham & Laney, PA  
1831 West Evans Street, Suite 400  
Florence, SC 29502  
*Attorney for Respondents*

WILLCOX, BUYCK & WILLIAMS, P.A.

By: s/ J. Scott Kozacki  
J. Scott Kozacki  
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*Attorney for Appellant*

June 14, 2022  
Florence, South Carolina

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June 14, 2022

Reply To: Florence

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**SC Court of Appeals**

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

Re: Walter Parker v. Florence Carpet & Tile, Inc., et al.; Case No: 2020CP2101297  
Allison Parker v. Florence Carpet & Tile, Inc., et al.; Case No: 2020CP2101296  
Appellate Case No: 2022-00131  
Our File No: 16453.17573

Dear Ms. Abbott Kitchings :

Enclosed for filing is an original and one copy of the Initial Brief of Appellant, Proof of Service, Designation of Matter To be Included in the Record on Appeal and Proof of Service in the above captioned case. Please time stamp the enclosed copies and return to us in the enclosed self-addressed stamped envelope provided for your convenience.

By copy of this letter, we are serving a copy of the above-stated pleadings on Jeffrey L. Payne, attorney for Respondent.

Should you have any questions or concerns, please contact me at (843) 664-3364.

With kindest regards,



Melisa Hargrove  
Paralegal to J. Scott Kozacki  
Email: [skozacki@willcoxlaw.com](mailto:skozacki@willcoxlaw.com)

JSK/mkh  
Enclosures  
CC: Jeffrey L. Payne, Esq.



16453, 17573

Willcox, Buyc &  
Williams, PA. Since 1895

Post Office Box 1909  
Florence, SC 29503

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JUN 10 2027

SC Court of Appeals

To:

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