

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Aug 22 2022**

**SC Court of Appeals**

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas

Jeffrey M. Tzerman, Master-In-Equity

Appellate Case No.: 2022-001041

Elizabeth A. Farmer.....Respondent,

v.

James Timothy Short.....Appellant.

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

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

1. Plaintiff's Complaint filed July 17, 2020.
2. Defendant's Answer and Counterclaim filed August 14, 2020.
3. Plaintiff's Reply to Defendant's Answer and Counterclaim filed September 2, 2020.
4. Plaintiff's Motion for Writ of Partition filed December 4, 2020.
5. Plaintiff's Motion for Order of Reference filed December 4, 2020.
6. Defendant's Memorandum in Opposition to Motion for a Writ of Partition and Appointment of Commissioners filed March 22, 2021.
7. Judge Lee Form-4 Order dated March 29, 2021.

8. Order of The Honorable Jeffrey M. Tzerman dated January 26, 2022.
9. Defendant's Motion to Alter or Amend and for Reconsideration filed February 4, 2022.
10. Order of The Honorable Jeffrey M. Tzerman denying Defendant's Motion to Alter or Amend and for Reconsideration dated June 23, 2022.
11. Defendant's Notice of Appeal dated July 22, 2022.
12. Transcript of Record dated August 25, 2021.

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

Respectfully submitted,

s/Michael D. Wright

Michael D. Wright  
SAVAGE, ROYALL & SHEHEEN, L.L.P.  
P.O. Drawer 10  
Camden, South Carolina 29021  
803-432-4391  
[mwright@thesavagefirm.com](mailto:mwright@thesavagefirm.com)

**Other Counsel of Record:**

John W. Wells, Esquire  
Baxley, Pratt & Wells, P.A.  
Post Office Box 10  
Lugoff, SC 29078  
803-438-4200  
jwells@baxleywells.com

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Aug 22 2022**

**SC Court of Appeals**

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas

Jeffrey M. Tzerman, Master-In-Equity

Appellate Case No.: 2022-001041

Elizabeth A. Farmer.....Respondent,

v.

James Timothy Short.....Appellant.

**PROOF OF SERVICE**

The undersigned certifies that, on August 22, 2022, a copy of the Initial Brief of Appellant and Appellant's Designation of Matter to be included in the Record on Appeal have been served upon counsel of record for the Respondent via electronic mail using the email addresses listed in the Attorney Information System as set forth below:

John W. Wells, Esquire  
Baxley, Pratt & Wells, P.A.  
Post Office Box 10  
Lugoff, SC 29078  
803-438-4200  
jwells@baxleywells.com

[Signature Page to Follow.]

Respectfully submitted,

s/Michael D. Wright

---

Michael D. Wright  
SAVAGE, ROYALL & SHEHEEN, L.L.P.  
P.O. Drawer 10  
Camden, South Carolina 29021  
803-432-4391  
mwright@thesavagefirm.com

August 22, 2022

**SAVAGE ROYALL & SHEHEEN L.L.P.**  
ATTORNEYS AND COUNSELORS AT LAW

WILLIAM B. COX, JR.  
VINCENT A. SHEHEEN\*  
STEPHEN R. SMOAK  
MICHAEL D. WRIGHT  
GREG B. COLLINS

1111 CHURCH STREET  
CAMDEN S.C. 29020

P.O. DRAWER 10  
CAMDEN S.C. 29021

TELEPHONE: (803) 432-4391  
FACSIMILE: (803) 425-4816  
FACSIMILE: (803) 425-4812  
WWW.SAVAGE-LAWFIRM.COM

---

HENRY SAVAGE, JR., 1903-1990  
EDWARD M. ROYALL - OF COUNSEL  
ROBERT J. SHEHEEN - OF COUNSEL  
MOULTRIE B. BURNS, JR. - OF COUNSEL

\*CERTIFIED MEDIATOR & ARBITRATOR

August 22, 2022

**VIA E-Filing to: [ctapp@filings@sccourts.org](mailto:ctapp@filings@sccourts.org)**

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

**RECEIVED**

**Aug 22 2022**

**SC Court of Appeals**

RE: Elizabeth A. Farmer v. James Timothy Short  
Appellate Case No.: 2022-001041

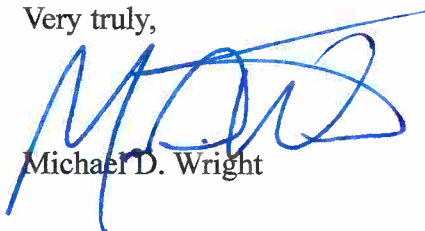
Dear Mrs. Kitchings:

I hope this correspondence finds you doing well.

Please find enclosed for electronic filing and service the Initial Brief of Appellant and Appellant's Designation of Matter to be Included in the Record on Appeal as well as accompanying proof of electronic service. I ask that you have someone from your office provide me with a file stamped copy of the same. By electronic copy of this letter, I am serving all counsel of record of my correspondence with the court and a copy of the aforementioned filings.

If you have any questions, please do not hesitate to contact me.

Very truly,



Michael D. Wright

Enclosures as Stated

cc: John Wells, Esquire (via electronic mail)