

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

RECEIVED

Sep 22 2022

S.C. SUPREME COURT

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Honorable Jocelyn Newman, Circuit Court Judge

---

Appellate Case No. 2022-001280

Case No. 2021-CP-40-02306

---

FREDDIE EUGENE OWENS, BRAD KEITH SIGMON, GARY DUBOSE  
TERRY, and RICHARD BERNARD MOORE,..... Respondents,

v.

BRYAN P. STIRLING, in his official capacity as the Director of the  
South Carolina Department of Corrections; SOUTH CAROLINA  
DEPARTMENT OF CORRECTIONS; and HENRY MCMASTER, in his  
official capacity as Governor of the State of South Carolina, ..... Appellants.

---

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

---

Daniel C. Plyler  
Austin T. Reed  
SMITH | ROBINSON  
2530 Devine Street  
Columbia, SC 29205

*Counsel for Director Stirling  
and SCDC*

Thomas A. Limehouse, Jr.  
*Chief Legal Counsel*  
Wm. Grayson Lambert  
*Senior Legal Counsel*  
Erica Wells Shedd  
*Deputy Legal Counsel*  
OFFICE OF THE GOVERNOR  
South Carolina State House  
1100 Gervais Street  
Columbia, SC 29201

*Counsel for Governor McMaster*

Under Rule 209, SCACR, Appellants designate the following material to be included in the Record on Appeal:

**Orders and Judgments**

1. September 6, 2022 Order
2. June 11, 2021 Order
3. July 5, 2022 Order

**Pleadings**

4. Third Amended Complaint
5. Answer to Third Amended Complaint
6. Exhibit A (filed Sept. 28, 2021)
7. Exhibit B (filed Sept. 28, 2021)

**Transcripts and Motions**

8. Motion to Exclude Wikswo Expert Testimony
9. Defendants' Pretrial Brief
10. Trial Transcript

**Exhibits**

11. Defendants' Exhibit 1

Under Rule 209(c), SCACR, I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

s/Wm. Grayson Lambert

Thomas A. Limehouse, Jr. (S.C. Bar No. 101289)

*Chief Legal Counsel*

Wm. Grayson Lambert (S.C. Bar No. 101282)

*Senior Legal Counsel*

Erica W. Shedd (S.C. Bar No. 104287)

*Deputy Legal Counsel*

OFFICE OF THE GOVERNOR

South Carolina State House

1100 Gervais Street

Columbia, South Carolina 29201

(803) 734-2100

[tlimehouse@governor.sc.gov](mailto:tlimehouse@governor.sc.gov)

[glambert@governor.sc.gov](mailto:glambert@governor.sc.gov)

[eshedd@governor.sc.gov](mailto:eshedd@governor.sc.gov)

*Counsel for Governor McMaster*

s/ Daniel C. Plyler

Daniel C. Plyler (S.C. Bar No. 72671)

Austin T. Reed (S.C. Bar No. 102808)

SMITH | ROBINSON

2530 Devine Street

Columbia, SC 29205

(803) 254-5445

[Daniel.Plyler@SmithRobinsonLaw.com](mailto:Daniel.Plyler@SmithRobinsonLaw.com)

[Austin.Reed@SmithRobinsonLaw.com](mailto:Austin.Reed@SmithRobinsonLaw.com)

*Counsel for Director Stirling and SCDC*

September 22, 2022  
Columbia, South Carolina