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Sep 28 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2022-000729

Thomas Rodriquis Nelson,.....Respondent,

v.

Florence Concrete Products, Inc.,.....Appellant.

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

Respondent Thomas Rodriquis Nelson designates the following to be included in the Record on Appeal, including any necessary redactions (Supreme Court Order 2014-04-15-02):

1. Notice of Appeal, filed
2. Order granting Plaintiff’s motion for summary judgment, filed April 29, 2022
3. Consent Order, filed December 9, 2021
 - a. With exhibits
4. Complaint, 2019-CP-31-00296, filed September 9, 2019
5. Amended complaint, 2019-CP-31-00296, filed October 21, 2019
6. Defendant Florence Concrete Products, Inc.’s Answer to Amended Complaint, 2019-CP-31-00296, filed January 20, 2020
7. Amended complaint, filed January 4, 2022
 - a. Consent Order exhibit
 - b. SCDOT & NCDOT permits exhibit

8. Defendant Florence Concrete Products, Inc.'s Answer to Plaintiff's Amended Complaint for Declaratory Judgment and Counterclaim for Declaratory Relief, filed January 21, 2022
9. Plaintiff's Memorandum in Support of Motion for Summary Judgment, filed February 18, 2022
 - a. Exh. A - *Tuten v. Jackson*, C/A 2012-CP-25-00203 Order
10. Defendant Florence Concrete Products, Inc.'s Memorandum in Support of Declaratory Relief, filed February 28, 2022
11. Transcript of hearing on March 10, 2022
 - a. All pages (1-101)

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

September 28, 2022

Respectfully submitted,

s/Kathleen C. Barnes

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Thomas Rodriquis Nelson,.....Respondent,

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PROOF OF SERVICE

The undersigned certifies that a copy of Initial Brief of Respondent and Respondent’s Designation of Matter to be included in the Record on Appeal have been served upon counsel for Appellant via electronic mail at the email addresses stated in the Attorney Information System as set forth below on September 28, 2022.

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September 28, 2022

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Via E-Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
ctappfilings@sccourts.org

Re: *Thomas Rodriquis Nelson v Florence Concrete Products, Inc.*, Appellate Case No. 2022-000729
Respondent's Initial Brief and Designation of Matter

Dear Mrs. Kitchings:

Attached for filing is the (1) *Initial Brief of Respondent*, (2) *Respondent's Designation of Matter to be included in the Record on Appeal*, and (3) *Proof of Service*. By electronic copy of this letter, I am serving all counsel of record as stated below.

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

With kind regards, I am,

s/Kathleen C. Barnes

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