

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Nov 01 2022

SC Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Appellate Case No.: 2022-001175

Hunsten B. Ragin as Personal Representative for the Estate of Samel
Ragin.....Appellant,

v.

Pilgrim’s Pride Corporation, Mary McBride, and Susan
Jones..... Respondents

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

Appellant designates the following items for inclusion in the Record on Appeal, in addition to materials designated by the Respondent. Appellant reserves the right to seek to supplement the record pursuant to Rule 212, SCACR.

Orders/Decisions

1. Order denying Motion for Summary Judgment filed April 7, 2022;
2. Order granting Defendant’s Motion to Reconsider filed July 28, 2022;

Pleadings

3. Notice of Intent filed November 6, 2020;

4. Filed Affidavit of Merit November 6, 2020;
5. Summons and Complaint filed February 23, 2021;
6. Answer of Defendants filed April 7, 2021;
7. Defendant's Motion for Summary Judgement filed September 17, 2021;
8. Defendant's Memorandum in Support to Motion for Summary Judgement filed January 27, 2022 including exhibit:
 - Exhibit A - Hunsten Ragin Obituary
9. Plaintiff's Memorandum in Opposition to Motion for Summary Judgement filed January 31, 2022 including exhibit:
 - Exhibit A - Sedgwick denial letter dated January 27, 2020;
10. Defendant's Motion to Reconsider filed April 15, 2022;
11. Plaintiff's Memorandum in Opposition to Defendant's Motion to Reconsider Denial of Summary Judgement filed April 26, 2022;
12. Notice of Appeal filed August 19, 2022;

Transcript

13. Hearing Transcript dated January 31, 2022;
14. Hearing Transcript dated May 17, 2022:

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

Signature on following page

PARKER LAW GROUP, LLP

November 1, 2022
Hampton, South Carolina

By: _____



Neil E. Alger
John E. Parker, Jr.
101 Mulberry St. East
P.O. Box 457
Hampton, SC 29924
Phone: (803) 943-2111
nalger@parkerlawgroupsc.com
jparker@parkerlawgroupsc.com

-AND-

Dwight C. Moore
Moore Law Firm, LLC
PO Box 1229
Sumter, SC 29151

ATTORNEYS FOR THE APPELLANT

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CERTIFICATE OF SERVICE

This is to certify that I, Claudia Cartier, with the Parker Law Group, LLP., Attorney for the Appellant, have this date emailed a true and correct copy of the within *Appellant's Designation of Matter to be Included in the Record on Appeal* to:

Thomas Pritchard, Esquire
VERNIS & BOWLING OF COLUMBIA, LLC
2711 Middleburg Drive, Suite 216
Columbia, South Carolina 29204
Phone: (803) 234-5416
E-mail: tpritchard@scarolina-law.com
Attorney for Respondent



Claudia Cartier

November 1, 2022
Hampton, South Carolina.

November 1, 2022

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SC Court of Appeals

Via Email Only: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

Re: *Hunsten B. Ragin as Personal Representative for the Estate of Samel Ragin v. Pilgrim's Pride Corporation, Mary McBride and Susan Jones*
Civil Action No.: 2019-CP-36-00103

Dear Ms. Kitchings:

Please find enclosed for filing, Appellant's Initial Brief and Designation of Matter to be Including in the Record on Appeal in the above-referenced case.

By copy of this letter, Appellant's Initial Brief and Designation of Matter is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated.

cc:Thomas Pritchard, Esquire