

RECEIVED

Nov 21 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Circuit Court Judge

Appellate Case No. 2022-000346

Reid Fleming..... Appellant

v.

LG Chem, Ltd..... Respondent.

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

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondent LG Chem, Ltd. respectfully requests that the following items be included in the Record on Appeal:

1. All materials designated by Appellant-Plaintiff Reid Fleming.
2. Additional counter designations:
 - a. Respondent-Defendant LG Chem, Ltd.’s Motion for Leave to File Reply Memorandum of Law in Further Support of its Motion to Dismiss for Lack of Personal Jurisdiction, filed January 11, 2022
 - (1) Exhibit A Defendant LG Chem, Ltd.’s Reply Memorandum in Further Support of its Motion to Dismiss for Lack of Personal Jurisdiction and Notice of Supplemental Authority including attached Exhibits 1 through 3
 - b. Exhibits A through E to Respondent-Defendant LG Chem, Ltd.’s Memorandum in Opposition to Plaintiff’s Motion to Reconsider, filed February 22, 2022
 - (1) Certificate of Technical Failure or Technical Difficulties

The undersigned counsel hereby certifies, pursuant to Rule 209(c) of the South Carolina Appellate Court Rules that this Designation contains no matter that is irrelevant to the appeal.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: *s/ C. Mitchell Brown* _____

C. Mitchell Brown

SC Bar No. 012872

[E-Mail: mitch.brown@nelsonmullins.com](mailto:mitch.brown@nelsonmullins.com)

Rachel Atkin Hedley

SC Bar No. 16941

[E-Mail: rachel.hedley@nelsonmullins.com](mailto:rachel.hedley@nelsonmullins.com)

A. Mattison Bogan

SC Bar No. 72629

[E-Mail: matt.bogan@nelsonmullins.com](mailto:matt.bogan@nelsonmullins.com)

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

Attorneys for Respondent, LG Chem, Ltd.

Columbia, SC

November 21, 2022