

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Appellate Case No.: 2022-001175

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

v.


Pilgrim's Pride Corporation, Mary McBride, and Susan Jones.....Respondent.

RESPONDENTS' DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL

Respondents adopt in full the items designated by Appellant for inclusion in the Record on Appeal and seek to designate no additional materials at this time. Respondents reserve the right to seek to supplement the record pursuant to Rule 212, SCACR.

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

January 3, 2023  
Charleston, South Carolina

  
Thomas B. Pritchard (S.C. Bar No. 65006)  
VERNIS & BOWLING OF SOUTH CAROLINA, LLC  
494-A Savannah Hwy.  
Charleston, SC 29407  
Telephone: (843) 242-7805  
Email: [tpritchard@scarolina-law.com](mailto:tpritchard@scarolina-law.com)

Attorney for Respondents

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable Kristi F. Curtis, Circuit Court Judge

Appellate Case No.: 2022-001175

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

v.

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

**CERTIFICATE OF SERVICE**

This is to certify that the **Respondents’ Designation of Matter to be Included in the Record on Appeal**, to which this certificate is affixed, was served upon all parties to this action by hand delivery, by depositing a copy of same, enclosed in a first-class, post-paid envelope, addressed to the attorneys of record, or by other means as permitted by Appellate Court Rules as follows:

Neil E. Alger  
John E. Parker, Jr.  
PARKER LAW GROUP, LLC  
690 N. Green Street  
Ridgeland, SC 29936  
Tel.: (843) 547-8025  
[nalger@parkerlawgroupsc.com](mailto:nalger@parkerlawgroupsc.com)

[jayparker@parkerlawgroupsc.com](mailto:jayparker@parkerlawgroupsc.com)

-AND-

Dwight C. Moore  
MOORE LAW FIRM, LLC  
P.O. Box 1229  
Sumter, SC 29151-1229



---

Thomas B. Pritchard (SC Bar No.: 65006)  
VERNIS & BOWLING OF SOUTH CAROLINA, LLC  
494-A Savannah Highway  
Charleston, SC 29407  
(843) 242-7805  
[tpritchard@scarolina-law.com](mailto:tpritchard@scarolina-law.com)

January 3, 2023  
Charleston, South Carolina

# VERNIS & BOWLING

ATTORNEYS AT LAW • EST. 1970

2711 Middleburg Drive, Suite 216, Columbia, South Carolina 29204 • Telephone: 803-234-5416 • Facsimile: 803-978-6246

RECEIVED

Jan 03 2023

SC Court of Appeals

Thomas B. Pritchard  
tpritchard@scarolina-law.com  
Randi M. Berlin  
rberlin@scarolina-law.com

January 3, 2023

**Via Electronic Mail Only**

Jenny Abbott Kitchings, Clerk of Court  
Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re:** Hunsten B. Ragin as Personal Representative of the Estate of Sameel Ragin vs. Pilgrim's Pride Corporation, Mary McBride, and Susan Jones  
Court of Appeals Case No.: 2022-001175  
Civil Case No.: 2021-CP-43-00307  
V&B File Number: 1485-21035

Dear Ms. Kitchings:

As you are aware, we represent Respondents Pilgrim's Pride Corporation, Mary McBride, and Susan Jones in regard to the above-referenced matter. Enclosed for filing with the Court, please find Respondents' Initial Brief and Respondents' Designation of Matter to Be Included in the record on Appeal, each with the appropriate Certificate of Service. By copy of same to all counsel, they are also being served with a copy of same.

Please let us know if you have any questions or need any additional information.

With highest regards,

*/s/ Thomas Pritchard*

Thomas B. Pritchard

TBP/rmb  
Enclosures

cc: Neil E. Alger, Esquire  
John E. "Jay" Parker, Jr., Esquire  
Dwight C. Moore, Esquire

DELAND, FL  
FORT MYERS, FL  
HOLLYWOOD, FL  
ISLAMORADA, FL

JACKSONVILLE, FL  
MELBOURNE, FL  
MIAMI, FL  
NORTH PALM BEACH, FL

PENSACOLA, FL  
ST. PETERSBURG, FL  
TAMPA, FL  
BIRMINGHAM, AL  
MOBILE, AL

ATLANTA, GA  
GULFPORT, MS  
FLOWOOD, MS  
CHARLOTTE, NC  
COLUMBIA, SC