

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

Feb 24 2023

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas  
Edgar W. Dickson, Circuit Judge

Appellate Case No. 2022-001070  
Court of Common Pleas Case No. 2020-CP-18-02003

ROSEN HAGOOD, LLC,

Respondent/Appellant,

v.

ALBERT T. HENSON, JR.,

Appellant/Respondent.

**RESPONDENT/APPELLANT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL**

Respondent/Appellant designates the following to be included in the Record on Appeal:

- (1) Summons, Complaint, and Verification filed June 30, 2020 with exhibits.
- (2) Answer of Defendant filed January 27, 2021.
- (3) Plaintiff's Motion for Summary Judgment filed April 7, 2022 with exhibits.
- (4) Affidavit of Daniel F. Blanchard, III, filed April 7, 2022 with exhibits.
- (5) Representation agreement dated May 25, 2016.
- (6) Client Ledger Report dated November 24, 2020.
- (7) Order of Probate Judge Molly D. Edwards dated November 25, 2019 in case styled *In re Estate of Ann Page Pittillo*, Case No. 2014-ES-18-00592.
- (8) Excerpts of deposition of Albert T. Henson, Jr. taken March 23, 2022 (pages 1, 2, 13, 14, 15, 16, 17, 18, 19, 20, 22, 23, 39, 40, 61, and 62).
- (9) Plaintiff's Request to Admit to Defendant dated February 14, 2021.
- (10) Defendant's Response to Plaintiff's Request to Admit dated March 10, 2021.
- (11) Plaintiff's Memorandum in Support of Motion for Summary Judgment dated May 26, 2022 with exhibit submitted to Circuit Judge.
- (12) Affidavit of Plaintiff's Attorney dated June 1, 2022.
- (13) Summary sheet of prejudgment interest calculations (totaling \$57,083.46).
- (14) Detailed transaction file list document dated March 21, 2022.
- (15) Transcript of Hearing before The Honorable Edgar W. Dickson on June 1, 2022, all pages.

- (16) Form 4 Order of The Honorable Edgar W. Dickson filed June 30, 2022.
- (17) Clerk of Court's service of Order on pro se litigant filed June 30, 2022.
- (18) Email from Deborah Hill to Circuit Judge Edgar W. Dickson's law clerk (Jessica Thompson) dated May 26, 2022, with attached Plaintiff's Memorandum in Support of Motion for Summary Judgment dated May 26, 2022 with exhibit.
- (19) Email from Circuit Judge Edgar W. Dickson's law clerk (Jessica Thompson) to Deborah Hill dated June 30, 2022.
- (20) Henson's Opposition to Motion for Summary Judgment filed May 31, 2022 with attached exhibits.

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

Respectfully submitted,

ROSEN HAGOOD, LLC

By: /s/ F. Truett Nettles, II

F. Truett Nettles, II, of counsel (SC Bar 4195)

151 Meeting Street, Suite 400

Charleston, SC 29401

(843) 577-6726 telephone

[tnettles@rosenhagood.com](mailto:tnettles@rosenhagood.com)

ATTORNEYS FOR RESPONDENT-APPELLANT

February 24, 2023.