

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM GREENVILLE  
COUNTY CIRCUIT COURT

APR 24 2023

SC Court of Appeals

G. D. Morgan, Jr., Circuit Court Judge

Perry H. Gravely, Circuit Court Judge

Circuit Court Case No. 2020-CP-23-01450  
Appellate Case No. 2022-001432

Michael Gene Putnam.....Appellant,

v.

Robert Henry Purkerson and Robin Cary Maples.....Respondents.

**DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL**

Appellant proposes the following to be included in the consolidated Record on Appeal.

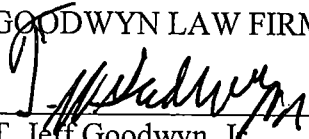
1. Order denying Purkerson's Motion for Summary judgment dated June 25, 2020.
2. Form 4 Order granting Purkerson's Renewed Motion for Summary Judgment dated July 8, 2022
3. Order granting Purkerson's Renewed Motion for Summary Judgment dated August 17, 2022.
4. Order granting Maples Motion for Summary Judgment dated December 6, 2021.
5. Appellant's Motion to Reconsider December 6, 2021 Order dated December 28, 2021.
6. Order denying Motion Reconsider December 6, 2021 Order dated January 3, 2022.
7. Appellant's Motion to Reconsider August 17, 2022 Order dated August 29, 2022.

8. Order denying Appellant's Motion to Reconsider August 17, 2022 Order dated September 8, 2022.
9. Appellant's Notice of Appeal dated January 8, 2020.
10. Appellant's Motion for Reconsideration dated August 29, 2022.
11. Appellant's Brief in Response to Purkerson's Motion for Summary Judgment.
12. Appellant's Summons and Complaint.
13. Appellant's Amended Summons and Complaint.
14. Summons and Complaint from Federal Court case.
15. Amended Summons and Complaint from Federal Court case.
16. Defendants Purkerson and Maples Answer.
17. Deposition transcript of Lyn Maples.
18. Transcript of Summary Judgment Motion Hearing dated June 21, 2022.
19. Purkerson's Renewed Motion for Summary Judgment dated April 19, 2022 with memorandum in support dated June 14, 2022.
20. Appellant's Brief in Response to Purkerson's Motion for Summary Judgment including all exhibits and attachments.
21. Maples May 3, 2021 filing of her responses to requests to produce.
22. Purkerson's December 22, 2021 filing of his motion to compel with exhibits.
23. Michael Gene Putnam's Affidavit in Opposition to Purkerson's Motion for Summary Judgment filed June 17, 2022.
24. Maples May 3, 2021 filing of her Responses to Plaintiff's Requests to Produce on the public index.
25. Public Index listing for this case showing all filings in case.

26. November 15, 2021 Transcript of hearing.
27. Transcript of hearing on Motion for Summary Judgment and for Discovery Sanctions dated May 12, 2021.
28. Transcript of hearing dated June 21, 2022.
29. Voicemail recording of Purkerson leaving message with Putnam with woman in background dated 5/16/22.
30. Email dated 9/1/15.
31. Email dated 10/28/17 at 5:33 p.m.
32. Email dated 10/29/17 at 8:58 a.m.
33. Motion to Amend Compliant filed July 24, 2020 including exhibits.
34. All relevant pleadings and filings from the Federal District Court case and this State Court case.

Pursuant to Rule 209(c), SCACR, I certify that this Designation contains no matter which is irrelevant to the appeal.

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Attorney for Appellant

Columbia, South Carolina

April 24, 2023

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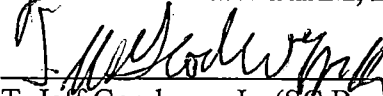
**PROOF OF SERVICE**

I certify that I have served a copy of the **Appellant’s Initial Brief and Designation of Matter** on Wesley J. Shull, Esquire, counsel for Respondent Purkerson, and Douglas R. Churdar, Esquire, counsel for Respondent Maples, at the addresses below by depositing a copy of same in the United States Mail, postage prepaid, as well as via email as shown, on April 24, 2023.

Wesley J. Shull, Esquire  
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325 Rocky Slope Road, Suite 201  
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April 24, 2023

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\*Also Licensed in Georgia  
† Certified Circuit Court Mediator  
\*\* Of Counsel

April 24, 2023

## VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

# RECEIVED

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SC Court of Appeals

RE: *Michael Gene Putnam v. Robert Henry Purkerson and Robin Cary Maples*  
*Case No.: 2020-CP-23-01450*  
*Appellate Case No.: 2022-001432*  
*Our File No.: 3000-0743*

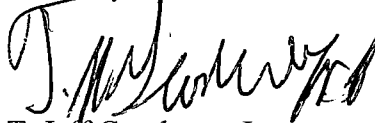
Dear Ms. Kitchings:

Enclosed for filing, please find an original and one copy of **Appellant's Initial Brief** and **Designation of Matter** along with an original and one copy of the **Proof of Service** in regards to the above-referenced matter.

As evidenced in the Proof of Service, I have served all interested parties with a copy of the Initial Brief and Designation of Matter.

Thank ou for your attention to this matter and should you have any questions please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG  
Enclosures

cc: Wesley J. Shull, Esquire  
Douglas A. Churdar, Esquire  
Michael G. Putnam