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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

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Case No. 2016-CP-40-04463  
Appellate Case No. 2023-000556

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Jean Watkins, as Personal  
Representative of the Estate  
Of Mildred Watkins,

Respondent,

v.

Sterling Healthcare, Inc.,  
Country Wood Nursing  
Center, LLC, and Guardian  
Resources, LLC,

Appellants.

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

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The respondent designates the following matters to be included in the Record on Appeal.

1. All matters previously designated by the Appellants, plus any and all exhibits thereto.
2. Answer of Sterling Healthcare, Inc.
3. Answer of Country Wood Nursing Center, LLC.
4. Answer of Guardian Resources, LLC.
5. July 29, 2015 Motion to Compel

6. February 24, 2016 Memorandum in Support of July 2015 Motion to Compel with Exhibits
7. December 8, 2016 Order Granting Motion to Compel
8. January 23, 2017 Motion for Sanctions
9. July 31, 2017 Memorandum in Support of Motion for Sanctions with Exhibits
10. December 6, 2022 Defendant's Memorandum in Opposition to Damages

Respectfully submitted,

/s/ Jennifer Randolph Purdy  
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ATTORNEYS FOR RESPONDENT

August 1, 2023

**CERTIFICATION OF COUNSEL**

The undersigned counsel of record certifies that this Designation contains no matter which is irrelevant to the appeal.

/s/ Jennifer Randolph Purdy