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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas for the First Circuit

The Honorable Diane S. Goodstein

Case No.: 2022-CP-18-00295
Appellate Case No.: 2023-000655

LAURA ABERNATHY.....Plaintiff /*Appellant*,

v.

ERVIN W. LAMBERT, SR., PERSONAL REPRESENTATIVE OF THE ESTATE OF ERVIN
E. LAMBERT, JR., DECEASED.,.....*Defendant/Respondent*.

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

Appellant asserts the following documents, with all supporting exhibits, should be included in the Record on Appeal:

ORDERS

1. Order Denying Defendant’s Motion to Dismiss (Hon. Diane S. Goodstein) filed November 10, 2020;
2. Consent Order of Dismissal (40)(j) (Hon. Diane S. Goodstein) filed September 30, 2021;
3. Consent Order to Restore (Hon. Diane S. Goodstein) filed February 15, 2022;
4. Consent Scheduling Order (Hon. Diane S. Goodstein) filed August 25, 2022;
5. Order Denying Plaintiff’s Motion to Amend and for Joinder (Hon. Diane S. Goodstein) filed December 19, 2022;

6. Form 4 Order Denying Motion for Summary Judgment (Hon. Diane S. Goodstein) filed February 23, 2023;
7. Form 4 Denying Motion to Consolidate (Hon. Diane S. Goodstein) filed April 12, 2023;

MOTIONS

1. Plaintiff's Memorandum in Opposition to Motion to Dismiss (with all supporting exhibits dated July 13, 2020);
2. Motion to Amend (with all supporting exhibits) dated September 20, 2022;
3. Plaintiff's Memo in Opposition to Motion for Summary Judgment (with all supporting exhibits) dated February 10, 2023;
4. Defendant's Memorandum in Support of Motion for Summary Judgment (with all supporting exhibits) dated February 6, 2023;
5. Motion to Amend (with all supporting exhibits) dated March 9, 2023;
6. Motion to Consolidate (with all supporting exhibits) dated March 17, 2023;
7. Plaintiff's Memo in Support of Motion to Consolidate (with all supporting exhibits) dated April 5, 2023;

PLEADINGS

1. Summons and Complaint (with all supporting exhibits) filed June 12, 2020;
2. Answer and Counterclaim (with all supporting exhibits) filed December 3, 2020;
3. Amended Summons and Amended Complaint (Wrongful Termination suit) (with all supporting exhibits) filed March 16, 2023;

TRANSCRIPTS

1. 10-4-2022 Hearing Transcript;
2. 4-6-23 Hearing Transcript;
3. Deposition Transcript of Laura Abernathy;
4. Deposition Transcript of Eileen Kolpack;
5. Deposition Transcript of Ervin Lambert;

OTHER

1. Affidavit of Eileen Kolpack

2. Closing documents
3. Notice of Appeal

I certify this designation contains no matter irrelevant to this appeal.

EPTING & RANNIK, LLC

September 20th, 2023
Charleston, South Carolina

/s/ Jaan Rannik

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