

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
CIRCUIT COURT

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-20-00104
Appellate Case No.: 2023-001451

RECEIVED
DEC 21 2023
SC Court of Appeals

Bertha Goins,.....Respondent,

v.

Jenkinsville Water Co., Inc.,.....Appellant.

DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL

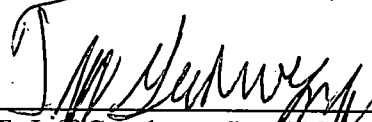
Appellant proposes the following to be included in the consolidated Record on Appeal.

1. Summons and Complaint filed March 4, 2020.
2. Answer and Counterclaim of Respondent.
3. Respondent’s Motion for Summary Judgment.
4. Respondent’s Brief in Support of Motion for Summary Judgment.
5. Appellant’s Brief in Opposition of Motion for Summary Judgment.
6. Order granting summary judgment dated April 28, 2023.
7. Appellant’s Motion to Alter/Amend dated May 8, 2023 .
8. Order denying Motion to Alter/Amend dated September 8, 2023.
9. Transcript of Summary Judgment Hearing dated March 23, 2023.

10. Deposition transcripts of Greg Ginyard, Bertha Goins, and Clemart Camack.
11. Fairfield County Council minutes of 4/8/19, 4/22/19, 10/14/19, 1/13/19.
12. Newspaper articles from the Associated Press, Charlotte News & Observer, 106.3 The Word, SC Now, The Independent Voice, and The State (bates no. 00816-00836).
13. State and National awards to JWC for best tasting water in 2017 and 2019.
14. Letter from Senator Mike Fanning giving JWC public recognition for having the best tasting water dated January 6, 2020.
15. Multiple boil water notice issued by JWC.
16. Appellant's Notice of Appeal.

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

GOODWYN LAW FIRM, LLC



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Columbia, South Carolina
December 21, 2023

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PROOF OF SERVICE

I certify that I have served a copy of the **Motion for Extension to File and Serve Appellant's Initial Brief and Designation of Matter**, upon Samantha S. Owens, Esquire; Austin T. Reed, Esquire; Daniel C. Plyler, Esquire; Sydney J. Douglas, Esquire and H. Thomas Morgan, Jr., Esquire, Attorneys for Respondent, at the address(es) below by depositing a copy of same in the United States Mail, postage prepaid, on December 21, 2023.

<p>Samantha S. Owens, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205</p>	<p>Austin T. Reed, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205</p>
<p>Daniel C. Plyler, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205</p>	<p>H. Thomas Morgan, Jr., Esquire Smith Robinson, LLC 935 Broad Street Camden, S.C. 29020</p>
<p>Sydney J. Douglas, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205</p>	

Columbia, South Carolina
December 21, 2023

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

December 21, 2023

VIA HAND DELIVERY

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

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DEC 21 2023
SC Court of Appeals

RE: ***Bertha Goins v. Jenkinsville Water Company, Inc.***
Civil Action No.: 2022-CP-20-00104
Appellate Case No.: 2023-001451
Our File No.: 3550-0001

Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of **Motion for Extension to File and Serve 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.

Also, 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.


Please return the filed copies of same to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees.

As evidenced in the Proofs of Service, I have served all interested parties, with a copy of these documents.

GOODWYN LAW FIRM, LLC

Thank you 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/msb

Enclosures

cc: Samantha S. Owens, Esquire
Austin T. Reed, Esquire
Daniel C. Plyler, Esquire
Sydney J. Douglas, Esquire
H. Thomas Morgan, Jr., Esquire