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May 06 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM FLORENCE COUNTY

Court of Common Pleas

The Honorable H. Steven DeBerry, IV, Circuit Court Judge

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Appellate Case No. 2023-001713

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Barbara L. Sarb..... Respondent/Appellant,

v.

Julie W. Phillips and Joseph M. Phillips.....Appellants/Respondents.

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**RESPONDENT/APPELLANT’S DESIGNATION ON MATTER TO BE INCLUDED IN  
THE RECORD ON APPEAL**

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Respondent/Appellant designates the following items for inclusion in the Record on Appeal, in addition to materials designated by the Appellants/Respondents. Respondent/Appellant reserves the right to seek to supplement the record pursuant to Rule 212, SCACR.

1. Plaintiff’s Motion for Leave to Amend Complaint with Exhibits, filed March 2, 2021;
2. Form 4 Order Granting Plaintiff Leave to Amend Complaint, filed August 18, 2021;
3. Plaintiff’s Reply to Defendants’ Answer and Counterclaims to Plaintiffs’ Amended Complaint, filed October 19, 2021.
4. Plaintiff’s Motion in Limine and Motion to Dismiss Defendants’ Frivolous Proceedings Counterclaim or in the Alternative to Bifurcate such Claim, filed September 1, 2023 (including all exhibits);
5. Defendants’ Pretrial Brief, dated September 6, 2023;
6. Form 4 Order – Jury Verdict, filed September 15, 2023;

7. Plaintiff's Motion for Judgment Notwithstanding the Verdict, filed September 25, 2023;
8. Plaintiff's Motion for Attorney's Fees and Costs, filed October 12, 2023 (including all exhibits);
9. Plaintiff's Memorandum in Opposition to Defendants' Motion for Attorneys Fees and Costs, filed October 20, 2023;
10. Supplemental Affidavit of Ely O. Grote, filed October 20, 2023;
11. Plaintiff's Trial Exhibit 1;
12. Plaintiff's Trial Exhibit 10;
13. Plaintiff's Trial Exhibit 13;
14. Plaintiff's Trial Exhibit 24;
15. Plaintiff's Trial Exhibit 25;
16. Plaintiff's Trial Exhibit 28
17. Plaintiff's Trial Exhibit 29;
18. Plaintiff's Trial Exhibit 31;
19. Plaintiff's Trial Exhibit 32;
20. Plaintiff's Trial Exhibit 33;
21. Plaintiff's Trial Exhibit 34;
22. Plaintiff's Trial Exhibit 35;
23. Plaintiff's Trial Exhibit 36;
24. Plaintiff's Trial Exhibit 37;
25. Plaintiff's Trial Exhibit 38;
26. Plaintiff's Trial Exhibit 41;
27. Plaintiff's Trial Exhibit 42;
28. Plaintiff's Trial Exhibit 43;
29. Plaintiff's Trial Exhibit 44;
30. Plaintiff's Trial Exhibit 45;
31. Plaintiff's Trial Exhibit 50;

32. Plaintiff's Trial Exhibit 51;
33. Plaintiff's Trial Exhibit 52;
34. Plaintiff's Trial Exhibit 54;
35. Plaintiff's Trial Exhibit 55;
36. Plaintiff's Trial Exhibit 56;
37. Plaintiff's Trial Exhibit 57;
38. Plaintiff's Trial Exhibit 58;
39. Plaintiff's Trial Exhibit 63;
40. Plaintiff's Trial Exhibit 64;
41. Plaintiff's Trial Exhibit 170; and
42. Plaintiff's Trial Exhibit 184.

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

Respectfully submitted,

*s/ Valerie Garcia Giovanoli*  
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Columbia, SC  
May 5, 2024