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Aug 12 2024
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge
Trial Court Case No. 2022-CP-42-01677

Appellate Case No. 2023-001360

Taylor Chasey Robertson,

Appellant,

v.

South Carolina Department of
Public Safety, South Carolina
Highway Patrol, and Trooper
Patrick J. Goshorn,

Respondents.

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

Appellant proposes the following be included in the Record on Appeal:

1. Summons and Complaint filed on 05/09/2022;
2. Affidavit of Personal Service of Patrick Goshorn on 09/06/2022 filed 09072022;
3. Affidavit of Personal Service on SCDPS/SCHP via Candace Horton on 09/06/2022 filed 09132022;
4. Frontpage of SCDPS Website <https://scdps.sc.gov/>;
5. Contact Us page of SCDPS website <https://scdps.sc.gov/about/contact>;
6. Affidavit of Personal Service of SC AG's Office via Jane McCrea on 09/06/2022;

7. Answer of Defendants filed on 10/06/2022;
8. DEFs' Motion to Allow Delayed Filing filed on 10/17/2022;
9. DEFs' Rule 12(b) Motion to Dismiss filed on 10/06/2022;
10. DEFs' Motion to Dismiss pursuant to § 15-78-60, 70 filed on 10/06/2022;
11. Affidavit of Diana Brown filed on 12/29/2022;
12. Form 4 Order granting DEFs' Motions to Dismiss filed on 03/21/2023;
13. PLT's Motion for Reconsideration of Form 4 Order filed on 05/24/2023;
14. Formal Order granting DEFs' Motions to Dismiss filed on 06/27/2023;
15. DEF Discovery Requests to PLT;
16. Email from DEF re: Discovery Responses of 03/03/2023;
17. SCDPS webpage re: Service of Process <https://scdps.sc.gov/general-counsel/subpoenas>;
18. Affidavit of Jamahl Spratley signed on 06/07/2023;
19. E-mail from Process Server re: experience at SCDPS address;
20. Affidavit of Personal Service of SCDPS via Paula Davis on 05/22/2023;
21. PLT's Amended Motion for Reconsideration filed on 06/30/2023;
22. Form 4 Order denying PLT's Motion for Reconsideration filed on 08/16/2024;
23. February 23, 2023 Hearing TRANSCRIPT;
24. August 14, 2023 Hearing TRANSCRIPT; and
25. Affidavit of Personal Service on SCDPS SCHP via Candace Horton on 09062022 filed 09212022.

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

SIGNATURE ON FOLLOWING PAGE

August 12, 2024

Respectfully submitted,

s/ Nicolas J. Baughman
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