

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge
Marvin H. Dukes, III, Master-In-Equity

Appellate Case No. 2011-204367
Common Pleas Case No. 2011-CP-07-2546

RECEIVED

SEP 04 2013

SC Court of Appeals

Joseph C. Sun, *Pro se*,

Appellant,

v.

Olesya Matyushevsky,
Citizens Opposed to Domestic Abuse,
Christine Varg and Liling Sun,

Respondents.

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

In addition to the matter identified by the Appellant in his Designation of Matter, Respondents Olesya Matyushevsky, Citizens Opposed to Domestic Abuse, and Christine Varg propose the following be included in the Record on Appeal:

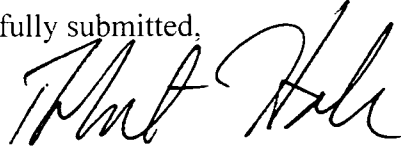
1. Family Court Order filed March 12, 2010;
2. Family Court Order filed June 21, 2010;
3. Family Court Decree of Divorce filed October 14, 2010;
4. Settlement Agreement made part of Decree of Divorce;
5. Complaint filed June 15, 2011;
6. Answer of Defendants Olesya Matyushevsky, Citizens Opposed to Domestic Abuse and Christine Varg filed July 19, 2011;
7. Motion to Dismiss of Defendants Olesya Matyushevsky, Citizens Opposed to Domestic Abuse and Christine Varg filed December 12, 2011;
8. Plaintiff's Motion to Amend and proposed Amended Complaint filed December 15, 2011;
9. Amended Complaint filed March 26, 2012;
10. Answer to Amended Complaint filed April 11, 2012;
11. Motion for Summary Judgment of Christine Varg filed June 5, 2012;

12. Transcript of Hearing on March 13, 2012;
13. Transcript of Hearing on July 12, 2012;
14. Affidavit of Christine Varg;
15. Affidavit of Liling Sun.

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

September 4, 2013

Respectfully submitted,



Sarah E. Wetmore (S.C. Bar No. 17235)
Jackson H. Daniel III (S.C. Bar No. 70308)
CARLOCK COPELAND & STAIR, LLP
40 Calhoun Street, Suite 400
Charleston, South Carolina 29401-3531
Telephone: (843) 727-0307

- and -

Charles J. Baker III (S.C. Bar No. 486)
WOMBLE CARLYLE SANDRIDGE & RICE, LLP
5 Exchange Street
Post Office Box 999
Charleston, SC 29402-0999
Telephone: (843) 722-3400

Attorneys for Respondents Olesya Matyushevsky,
Citizens Opposed to Domestic Abuse and Christine Varg

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge
Marvin H. Dukes, III, Master-In-Equity

Appellate Case No. 2011-204367
Common Pleas Case No. 2011-CP-07-2546

Joseph C. Sun, *Pro se*,

Appellant,

v.

Olesya Matyushevsky,
Citizens Opposed to Domestic Abuse,
Christine Varg and Liling Sun,

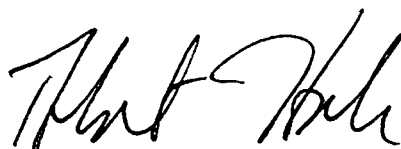
Respondents.


PROOF OF SERVICE

I certify that I have served **Respondents Olesya Matyushevsky, Citizens Opposed to Domestic Abuse, and Christine Varg's Designation of Matter to be included in the Record on Appeal** upon all parties by depositing a copy of it in the United States Mail, postage prepaid, on September 4, 2013, addressed as follows:

Joseph C. Sun, *Pro se*
P.O. Box 151
Bluffton, SC 29910

J. Samuel Scoville, Esq.
Harvey & Battey, P.A.
1001 Craven Street
Beaufort, SC 29901



 Sarah E. Wetmore (S.C. Bar No. 17235)
Jackson H. Daniel, III (S.C. Bar No. 70308)
CARLOCK COPELAND & STAIR, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
(843) 727-0307

LAW OFFICES

CARLOCK, COPELAND & STAIR, LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

JACKSON H. DANIEL, III

DIRECT DIAL NUMBER
843-266-8215

E-MAIL ADDRESS
jdaniel@carlockcopeland.com

FACSIMILE
843-727-2995

40 CALHOUN STREET, SUITE 400
CHARLESTON, SC 29401-3531

TELEPHONE (843) 727-0307

www.carlockcopeland.com

ATLANTA OFFICE
191 Peachtree Street, N.E., Suite 3600
Atlanta, Georgia 30303
(404) 522-8220

REPLY TO CHARLESTON
OFFICE

September 4, 2013

RECEIVED

SEP 04 2013

SC Court of Appeals

VIA COURIER

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: Sun v. Olesya Matyushevsky, Citizens Opposed to Domestic Abuse and
Christine Varg, et al.
Appellate Case No: 2011-204367
Our File No.: 3564-44375

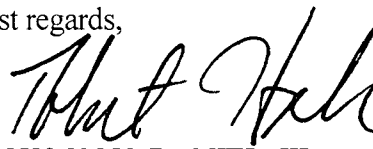
Dear Ms. Kitchings:

Enclosed for filing, please find an original and one (1) copy of each of the following:

1. Initial Brief of Respondents Olesya Matyushevsky, Citizens Opposed to Domestic Abuse and Christine Varg;
2. Designation of Matter to be Included in the Record on Appeal; and
3. Proof of Service.

By copy of this correspondence to all parties, I am serving them with the same. If you have any questions or concerns, please do not hesitate to contact me.

Best regards,


for JACKSON H. DANIEL, III

JHD:sss
Enclosures

cc: Joseph C. Sun, *Pro se*
Charles J. Baker, III, Esquire
J. Samuel Scoville, Esquire