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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable G.D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2024-001012
Circuit Court Case No. 2022-CP-23-056246

Chris Williams, Appellant,

v.

applya Occupational Strategies, LLC, Felix Mirando,
Tom Baumgarten, and Andrew Garnock, Respondents.

**APPELLANT’S DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Appellant, by and through his undersigned counsel, hereby designates the following material for inclusion in the Record on Appeal:

1. Summons and Complaint, filed November 14, 2022.
2. Answer of Defendants applya Occupational Strategies, LLC, Felix Mirando, and Thomas Baumgarten and Counterclaim of applya Occupational Strategies, LLC, filed December 15, 2022.
3. Defendants applya Occupational Strategies, LLC, Felix Mirando, and Thomas Baumgarten’s Motion for Partial Summary Judgment, filed on December 1, 2023.
4. Defendants applya Occupational Strategies, LLC, Felix Mirando, and Thomas Baumgarten’s Memorandum in Support of their Motion for Partial Summary Judgment, filed on January 2, 2024.

5. Plaintiff's Memorandum in Opposition of These Defendants applya Occupational Strategies, LLC, Felix Mirando, and Thomas Baumgarten's Motion for Partial Summary Judgment, filed on January 5, 2024.

Exhibit A – Employment Agreement

Exhibit B – Amendment to Employment Agreement

Exhibit C – September 15, 2022 Email

Exhibit D – September 29, 2022 Email

Exhibit E – October 13, 2022 Letter
6. Transcript of Hearing in Court of Common Pleas, held January 8, 2024.
7. Form 4 Order Granting Defendants applya Occupational Strategies, LLC, Felix Mirando, and Thomas Baumgarten's Motion for Partial Summary Judgment, filed on January 10, 2024.
8. Formal Order Granting Defendants' Motion for Partial Summary Judgment, filed on January 16, 2024.
9. Plaintiff's Motion to Reconsider Formal Order Granting Partial Summary Judgment Pursuant to Rule 59(e), SCRCPP and Memorandum of Law in Support, filed on January 24, 2024.
10. Defendants applya Occupational Strategies, LLC, Felix Mirando, and Thomas Baumgarten's Memorandum in Opposition to the Plaintiff's Motion to Reconsider, filed on January 31, 2024.
11. Form 4 Order Denying Plaintiff's Motion to Reconsider, filed on May 14, 2024.
12. Notice of Appeal, filed on June 12, 2024.

The undersigned certifies, pursuant to Rule 209(c), SCACR, that this designation contains no matter which is irrelevant to the appeal.

(Signature Page to Follow)

Respectfully submitted,

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s/ John F. Connell, Jr.

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Greenville, South Carolina
Dated: September 13, 2024

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