

**The State of South Carolina
In the Court of Appeals**

Appeal from Aiken County
Court of Common Pleas
The Honorable Doyet A. Early, III Circuit Court Judge
The Honorable Clifton Newman, Circuit Court Judge

Civil Action No.: 2011-CP-02-00868

**Paige Weeks Johnson, as Personal Representative
of the Estate of Christie Lane Valenzuela,**

versus

Sam English Grading, Inc.,

Respondent,

Appellant.

Appellant's Designation of Material to be Included in the Record on Appeal

Charles E. Carpenter, Jr.
Carpenter Appeals & Trial Support, LLC
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Attorneys for Appellants
Sam English Grading, Inc.

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Court of Appeals

Pleadings, Motions, Orders, etc.

1. Plaintiff's Summons and Complaint dated April 18, 2011
2. Defendant Sam English Grading's Answer
3. Defendant's Motion for Summary Judgment
4. Transcript from Motion for Summary Judgment and Motions in Limine Hearing held on August 21, 2012
5. Order Denying Defendant's Post Trial Motions dated September 27, 2012
6. Defendant's Notice of Appeal filed on October 31, 2012

Testimony

Trial Transcript pp. 57 – 1060
Deposition of Clifford Merritt

Exhibits

1. Plaintiff's Exhibit 30-Photograph of Redds' Branch Road from curve
2. Plaintiff's Exhibit 39-Photograph of Redds' Branch Road approaching intersection
3. Plaintiff's Exhibit 12-Photograph of Accident
4. Plaintiff's Exhibit 85-Photograph of Motorcycle
5. Defendant's Exhibit 17-Photograph of Placement of the Vehicles at time of accident
6. Defendant's Exhibit 5 & 20-South Carolina Driver's Manual and Rider's Handbook
7. Plaintiff's Exhibit 2-Encroachment Permit
8. Plaintiff's Exhibits 3 & 4-Contract and Purchase Order
9. Court's Exhibits 3 Transcript Of Clifford Merritt
10. Court's Exhibits 4 Jury Note
11. Court's Exhibits 5 Jury Note
12. Court's Exhibits 6 Jury Note
13. Court's Exhibits 7 Jury Note
14. Verdict form



Charles E. Carpenter, Jr.
Carpenter Appeals & Trial Support, LLC

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Certificate Of Service

I, the undersigned, an employee of Carpenter Appeals and Trial Support, LLC, attorneys for Appellant, Sam English Grading, Inc., do hereby certify that I have this date served the foregoing , **Initial Appellant's Brief and Designation of Matters**, by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the parties indicated below:

J. Paul Detrick
Peters, Murdaugh, Parker, Eltzroth
& Detrick, P.A.
Post Office Box 457
Hampton, SC 29924

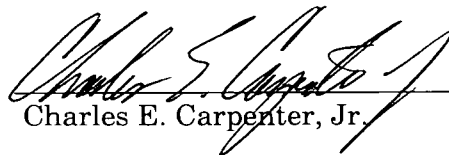
-and-

L. Lisa McPherson
McWhirter, Bellinger & Associates
119 East Main Street
Lexington, SC 29072

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Charles E. Carpenter, Jr.

Dated: September 16, 2013.