

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

Case No.: 2022-CP-23-01799

Appellate Case No: 2024-001914

RECEIVED

JUN 26 2025

SC Court of Appeals

J. Mereinda Fisher, Individually, and as Respondent, Member of Fisher and Reid, LLC,
Respondent.

v.

Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC, and Carolina Birth
Center, LLC d/b/a Carolina Water Birth
Appellant.

DESIGNATION OF MATTER

In addition to the matters designated by the Appellants, Respondents hereby designate the
following additional matters to the appeal:

1. Affidavits of Service filed May 6, 2022.
2. Answer and Counterclaims filed June 2, 2023.
3. Motion to Dismiss filed June 2, 2023.
4. Respondents Reply to Appellants' Counterclaims filed July 10, 2023.
5. Respondents' Motion to Dismiss filed July 10, 2023.
6. Appellants' Motion for Sanctions and Reply to Respondents' Motion to Dismiss filed
July 17, 2023.
7. Appellants' "Notice to Principal is Notice to Agent" filed February 14, 2024.

8. Appellants' Motion to Strike, Motion to Dismiss, and Motion to Compel Discovery filed April 22, 2024.
9. Notice of Hearing to Appellants filed May 30, 2024.
10. Write of Notice of Error filed June 24, 2024.
11. Appellants' initial Notice of Appeal filed October 16, 2024.
12. Service of Order upon Appellants filed October 24, 2024.

Respectfully submitted,

DUGGAN & HUGHES, LLC

s/Daniel R. Hughes

DANIEL R. HUGHES (SC Bar #72547)

457-B Pennsylvania Avenue

P. O. Box 449

Greer, SC 29652-0449

Telephone: (864) 334-2500

Facsimile: (864) 879-0149

ATTORNEYS FOR RESPONDENT

June 23, 2025

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
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The Honorable Alex Kinlaw, Circuit Court Judge

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Center, LLC d/b/a Carolina Water Birth
Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Initial Brief and Designation of Matter on
Appellant, Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC, and Carolina
Birth Center, LLC d/b/a Carolina Water Birth, electronically and by depositing a copy of it in the
United States Mail, postage prepaid to the following:

sandy@carolinawaterbirth.com

Cynthia J. Glenn, individually and as Member of Fisher and Reid, LLC,
and Carolina Birth Center, LLC d/b/a Carolina Water Birth
411 West Main Street, ICO Unit 87
Gray Court, SC 29645.

Respectfully submitted,

DUGGAN & HUGHES, LLC

s/Daniel R. Hughes

DANIEL R. HUGHES (SC Bar #72547)

457-B Pennsylvania Avenue

P. O. Box 449

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ATTORNEYS FOR RESPONDENT

June 23, 2025

DUGGAN & HUGHES, LLC
ATTORNEYS AND COUNSELORS AT LAW

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Greer, S.C. 29652

June 23, 2025

Via Email to ctappfilings@sccourts.org

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

**Re: J. Mereinda Fisher, individually, and Member of Fisher and Reid, LLC. v.
Cynthia J. Glenn, et al.
C.A. No.: 2022-CP-23-01799
Appellate Case No.: 2024-001914
File No.: DH22.0053**

Dear Sir or Madam:

Enclosed herewith please find Initial Brief of Respondents, Designation of Matter and Proof of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

DUGGAN & HUGHES, LLC



Daniel R. Hughes

DRH/tab
Enclosure

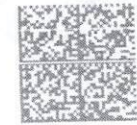
cc: **Via E-mail to sandy@carolinawaterbirth.com and Regular Mail**
Cynthia J. Glenn, individually and as Member of Fisher and Reid, LLC,
and Carolina Birth Center, LLC d/b/a Carolina Water Birth
411 West Main Street, ICO Unit 87
Gray Court, SC 29645.

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