

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

RECEIVED

The Honorable Alex Kinlaw, Circuit Court Judge JUL 01 2025

SC Court of Appeals

Case No.: 2022-CP-23-01799

Appellate Case No: 2024-001914

J. Mereinda Fisher, Individually, and as 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, Defendants,

of whom Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC is the Appellant.....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

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The Honorable Alex Kinlaw, Circuit Court Judge

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of whom Cynthia J. Glenn, individually, and as Member of Fisher and Reid, LLC is the Appellant.....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)

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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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Evan C. Bramhall
J. Alexander Zimmerman

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June 27, 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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JUL 01 2025
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**

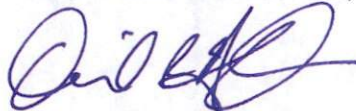
Dear Sir or Madam:

Pursuant to the Court's deficiency letter dated June 25, 2025, enclosed herewith please find the Initial Brief of Respondents, Designation of Matter and Proof of Service with the correct caption.

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

Sincerely,

DUGGAN & HUGHES, LLC

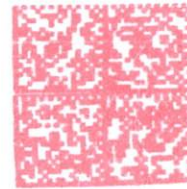


Daniel R. Hughes

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.

LAW OFFICES
DUGGAN & HUGHES, LLC
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TO:

Clerk of Court
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