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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Charleston County
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2025-000286

William Haynes as Personal Representative of the Estate of Elizabeth Varner,

Respondent,

v.

Fundamental Services LLC, Fundamental Clinical and Operational Services LLC, and Jerrolyn
Montgomery-Small,

Appellants.

**RESPONDENT'S DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD OF APPEAL**

PINKSTON LAW FIRM, LLC
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Attorney for Respondent

Pursuant to Rule 209, SCACR, and in addition to those materials identified in Appellants' designations, Respondent designates the following documents to be included in the Record on Appeal:

1. Riverside Memo in Support of Motion to Compel Arbitration filed January 28, 2022;
2. Transcript of Record, February 10, 2022;
3. Plaintiff's Motion for Reconsideration filed March 7, 2022;
4. Defendants' Petition for Final Order filed December 8, 2023;
5. Order Granting Petition for Final Order filed February 2, 2024;
6. Plaintiff Motion to Compel filed May 29, 2024; and
7. Transcript of Record, September 11, 2024.

Pursuant to Rule 209(c), SCAR, counsel for Respondent certifies that this Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,

PINKSTON LAW FIRM, LLC

/s/ Shawn Pinkston

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Dated: November 7, 2025