

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Courtney Clyburn Pope  
Circuit Court Judge

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Appellate Case No. 2025-000808  
Circuit Court Case No. 2023-CP-10-02263

Jeronimo Hernandez Jimenez.....Appellant,

v.

Rolando Medrano.....Respondent.

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APPELLANT’S DESIGNATION OF MATTER

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Appellant designates the following to be included in the Record on Appeal:

**Orders**

1. Order Granting Defendant’s Motion for Summary Judgment (March 27, 2025).

**Pleadings**

2. Summons and Complaint (May 10, 2023)
3. Answer to Complaint (June 20, 2023)

**Motions and Related Filings**

4. Defendant’s Motion for Summary Judgment, with Exhibits (June 5, 2024)
  - a. Excerpt of the Deposition of Jeronimo Hernandez Jimenez (May 20, 2024)
  - b. Excerpt of the Deposition of Rolando Medrano (May 20, 2024)

- c. Settlement Agreement and Release (April 10, 2023)
- 5. Plaintiff's Memorandum in Opposition to Motion for Summary Judgment, with Exhibits (Jan 7, 2025)
  - a. Map of Route taken by Defendant on date of Plaintiff's accident
  - b. Medical note by Shailesh Patel, MD.
  - c. Deposition of Jorge Hernandez Ramirez (April 1, 2021)
  - d. Settlement Agreement and Release (April 10, 2023)
- 6. Reply in Support of Motion for Summary Judgment with Exhibit
  - a. Deposition Transcript Excerpts of Plaintiff Jeronimo Jimenez (May 20, 2024)

#### **Transcripts**

- 7. Deposition of Jeronimo Hernandez Jimenez (October 29, 2020)
- 8. Deposition of Jeronimo Hernandez Jimenez (May 20, 2024)
- 9. Deposition of Rolando Medrano (November 17, 2020)
- 10. Deposition of Rolando Medrano (May 20, 2024)
- 11. Deposition of Alfredo Hernandez Castro (April 1, 2021)
- 12. Jorge Hernandez Ramirez (April 1, 2021)
- 13. Transcript of hearing on Motion for Summary Judgment (March 20, 2025)

#### **Other Documents**

- 14. Defendant's Responses to Plaintiff's Requests for Admissions

(signature page to follow)

LAW OFFICE OF  
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By:           s/Joshua R. Fester          

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