

RECEIVED
May 12 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Daniel Coble, Circuit Court Judge

Appellate Case No. 2025-002478
Case No. 2018-CP-40-4850

Randle Jackson as the Personal Representative of the
Estate of Dashaun Simmons, Respondent,

v.

South Carolina Department of Corrections,..... Appellant.

RESPONDENT’S DESIGNATION OF MATTER

Respondent proposes that the following materials be included in the Record on Appeal:

1. Defendant’s Motion for Protective Order, filed February 5, 2024;
2. Amended Complaint;
3. Summary Judgment Motion, filed April 7, 2023;
4. Order Denying Summary Judgment, filed December 27, 2023;
5. Order Denying Summary Judgment, filed January 2, 2024;
6. Motion for Summary Judgment or, in the Alternative, Motion to Strike SCDC’s Answer, filed May 27, 2025;
7. Memorandum in Support of Motion for Summary Judgment or, in the Alternative, Motion to Strike SCDC’s Answer, filed August 1, 2025;
8. Defendant’s Memorandum in Support of Motion for Summary Judgment, filed August 1, 2025;
9. Defendant’s Supplemental Memorandum in Support of Motion for Summary Judgment, filed August 6, 2025;
10. Order Denying Summary Judgment, filed August 7, 2025;
11. Order Denying Summary Judgment, filed August 25, 2025;
12. Defendant’s Motion to Alter or Amend, filed September 4, 2025;

13. Order Denying Defendant's Motion to Alter or Amend, filed November 13, 2025;
14. Deposition of Brittney Livingston;
15. Deposition of Evan Garris;
16. Deposition of Matthew Kennedy;
17. Deposition of Holden Byrd;
18. SCDC Policy/Procedure OP 22.06;
19. Statement of Matthew Kennedy;
20. Deposition of Clinton Parker;
21. BRCI July 17–18, 2017 Duty Roster;
22. Deposition of Anthony Hall;
23. Deposition of Ulysses Collins;
24. Statement of Ulysses Collins;
25. Statement of Holden Byrd; and
26. Post Order 6 – Control Room/Communications.

Respectfully submitted,

HAWKINS & JEDZINIAK, LLC

s/ Joshua T. Hawkins

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