

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY AND DARLINGTON COUNTY
Court of Common Pleas

J. Michael Baxley, Circuit Court Judge
Civil Action: 2007-CP-40-0576
J. Michael Baxley, Circuit Court Judge
Civil Action: 2010-CP-16-0332

Case Number: 2013-001461

Ex Parte: Douglas N. Truslow, Respondent,
Ex Parte: Tony R. Megna, Appellant,
In re:
James Anasti, Plaintiff,

v.

Lance Wilson, Willis Goodwin, Gina L. Anasti Lee and Richland County Clerk of
Court, Defendants.

And

Ex Parte: Desa Ballard, Respondent,
Ex Parte: Tony R. Megna, Appellant,
In re:
Pee Dee Health Care, P.A., Plaintiff,

v.

Estate of Hugh S. Thompson, Defendant.

DESIGNATIONS OF RESPONDENT DOUGLAS N. TRUSLOW

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Pursuant to Rule 209, SCACR, Respondent Douglas N. Truslow (hereinafter “Truslow”) proposes the inclusion of the following matter in the Record on Appeal in this matter. Truslow reserves the right to submit additional designations should the reply designations of Appellant introduce issues to which he has not responded in these designations. Unless otherwise stated, each designation includes all exhibits but excludes proof of service. Additionally, should Appellant delete any material designated by him upon which Truslow relies (and therefore has not designated here), he reserves the right to supplement these designations with the materials that Appellant previously designated but which he fails to include in the Record on Appeal:

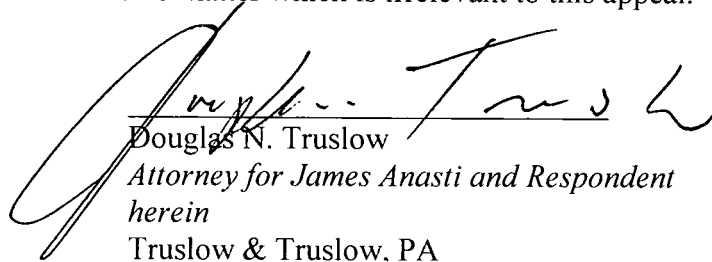
1. Complaint
2. Answers of Lee; Wilson and Goodwin
3. Megna’s letter and Motion to Terminate Discovery of September 11, 2007
4. Transcript of Summary Judgment – portions wherein Megna makes his argument and the Court responds
5. Summary Judgment Order
6. Motion for Sanctions of November 7, 2007
7. Notice for January 8, 2008 hearing dated December 11, 2007
8. Order of January 8, 2008 – reflecting all matters stayed pending appeal, as well as Megna’s letter and the transcript and the letters of Megna’s law partner Matthews dated April 10, 2008 and May 19, 2008
9. Orders of remand by the Court of Appeals including March 18, 2008
10. Order of April 3, 2008 finding Megna to have been untimely in the filing the appeal
11. Order of April 1, 2009 finding Megna once again to have been untimely in filing the appeal
12. Orders of the Court of Appeals dismissing the appeal and reopening it
13. Notice of Bankruptcy dated April 16, 2009
14. Motion to lift bankruptcy stay
15. November 9, 2009 bankruptcy order
16. December 21, 2009 bankruptcy order
17. January 15, 2010 bankruptcy order
18. Letters and emails of Megna dated February 24, 2010 stating Judge Manning’s orders had been vacated
19. Order of the Court of Appeals directing appeal to be limited to the issue of timeliness dated February, 2010
20. Order dismissing appeal of April 1, 2011
21. August 4, 2011 letter to Megna from Truslow regarding Thompson

subpoenas

22. Megna's Petitioner's [sic] response to motion to expedite August 10, 2011
23. Denial of petition for writ of certiorari
24. Remittitur order
25. November 1, letter of Truslow to court regarding status conference
26. November 3, letter of Megna with attachments to court regarding status conference
27. Transcript of January 18, 2012 hearing
28. January 20, 2012 letter to Megna
29. Emails regarding Tom Earle being in a coma by Megna of February, 2012
30. Order(s) regarding relieving Tom Earle as attorney for Wilson and Goodwin and Megna's consent
31. Discovery by Megna to DNT and Mr. Earle, alone with letters and emails of February and March 2012
32. Letter of August 8, 2011
33. Order filed March 1, 2012
34. Letter of Megna of March 7, 2012
35. Motion to Quash of March 9, 2012 with attachments and memorandum
36. Notice of Appearance of Aimee Zmorczech and Certificate of Service
37. Email of Judge Baxley of March 16, 2012
38. Letter and Synopsis of Megna of March 19, 2012
39. Truslow Memorandum, submissions and affidavits submitted for the May 15, 2012 hearing, including all matters contained in conjunction with Respondent's Memorandum filed May 9, 2012, along with exhibits A-C and subparts and affidavits; Lee's affidavit that Megna does not represent her and is not acting on her behalf.
40. Memorandum in reply to "Synopsis" of Megna
41. Email of Megna's counsel to the court of May 14, 2012
42. Megna's (Zmroczech's) Memorandum of May 15, 2012
43. Transcript of May 15, 2012 hearing
44. Court's Order of February 23, 2012
45. Two Florence cases in which Megna was involved, including appeals and dismissal of appeal as untimely (captions are only needed).
46. Complaint and award in "companion cases" 04-5333 and 04-5334
47. Order confessing Judgment (Wilson and Goodwin)
48. Letter of January 20, 2012
49. Motion to disqualify Megna in Thompson case
50. Return in Thompson case filed March 11, 2011, pages 1, 2, 3, 18, 19, 20, 21, and 48
51. Order disqualifying Megna in Thompson filed April 19, 2011
52. Motion to reconsider in Thompson filed May 2, 2011
53. Order in Thompson filed August 15, 2011
54. Order in Thompson dismissing Plaintiff's motion to reconsider the granting of summary judgment of October 4, 2011
55. Opinion in Thompson of Court of Appeals filed July 3, 2013
56. Supplemental reply by Megna in Anasti and Thompson dated May 29,

- 2012
57. Motion for sanctions in Thompson dated March 9, 2012, objection and exhibits
 58. Affidavit of fees of Ms. Ballard in Thompson
 59. Notice of hearing in Thompson dated June 17, 2011

I certify that this designation contains no matter which is irrelevant to this appeal.



Douglas N. Truslow

*Attorney for James Anasti and Respondent
herein*

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Columbia, South Carolina

12/12, 2013

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In The Court of Appeals

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J. Michael Baxley, Circuit Court Judge
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PROOF OF SERVICE

I, Mackenzie Woodward, paralegal for of Douglas N. Truslow, P.A. d/b/a Truslow &
Truslow, P.A., do certify that I have served a copy of the Initial Brief of Respondent Douglas N.

Truslow and Designations of Respondent Douglas N. Truslow on December 13, 2013, by placing a copy of same in the United States Mail, proper postage prepaid and addressed as follows:

Ariail King, Esquire
Lewis, Babcock & Griffin, LLP
1513 Hampton St.
Columbia, SC 29201

Desa Ballard, Esquire
226 State St.
West Columbia, SC 29169

Mackenzie Woodward

Mackenzie Woodward
Paralegal to Truslow & Truslow, P.A.

Columbia, South Carolina

12/13, 2013

Truslow & Truslow

Attorneys At Law

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Mailing Address:
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Columbia, SC 29202

December 13, 2013

Re: *Ex Parte Douglas N. Truslow v. Tony R. Megna In Re: James Anasti v. Lance Wilson, et al.*

Civil Action Number: 2007-CP-40-0576

SCCOA Case Number: 2013-001461

Via Hand Delivery

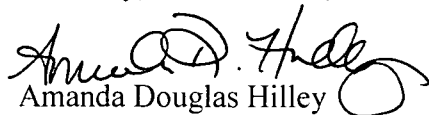
Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Dear Ms. Kitchings:

Please see the enclosed original and seven (7) copies of the Initial Brief of Respondent Douglas N. Truslow, the Designations of Respondent Douglas N. Truslow and the Proof of Service for same in the above referenced matter. Please file same and return the clocked copies to Ms. Woodward who is hand delivering the enclosed.

If there is anything more that you may require to effectuate this request, please do not hesitate to contact me.

Sincerely,


Amanda Douglas Hilley
Paralegal for Douglas N. Truslow

cc: Desa Ballard, Esquire
Ariail King, Esquire

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