

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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DEC 16 2013

SC Court of Appeals

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APPEAL FROM DARLINGTON COUNTY  
J. MICHAEL BAXLEY, CIRCUIT COURT JUDGE  
TRIAL COURT CASE NO. 2010-CP-16-0332  
APPELLATE CASE NO. 2013-001461

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*Ex Parte:* Douglas N. Truslow, Respondent,

*Ex Parte:* Tony R. Megna, Appellant

*In re:*

James Anasti, Plaintiff

Vs.

Lance Goodwin, Willis Goodwin, Gina L. Anasti Lee,  
And Richland County of 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.

Vs.

Estate of Hugh S. Thompson, Defendant.

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**DESIGNATIONS OF RESPONDENT DESA BALLARD**

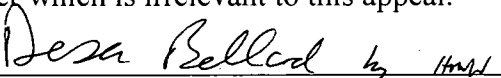
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Pursuant to Rule 209, SCACR, respondent Desa Ballard (hereafter "Ballard") proposes the inclusion of the following matter in the record on appeal in this matter. Ballard reserves the

right to submit additional designations should the reply designations of Appellant introduce issues to which she 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 Ballard relies (and therefore has not re-designated here), she 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.

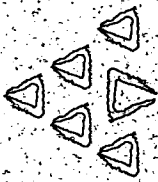
1. Order disqualifying Megna in *Pee Dee Health Care* dated 4-15-2011 (filed 4-19-2011)
2. Order denying reconsideration of disqualification in *Pee Dee Health Care* dated 8-15-2011
3. Order of Judge Baxley in *Pee Dee Health Care* dated 2-13-2013
4. Order denying Motion for Reconsideration in *Pee Dee Health Care* dated 6-23-2013.
5. Subpoena with exhibits dated 7-27-2011
6. Objection to Subpoena with cover letter to Ben Matthews dated 8-4-2011
7. Motion for Sanctions by Desa Ballard dated 8-4-2011
8. Affidavit of Doug Truslow filed in *Pee Dee Health Care* case on 10-19-2011
9. Supplemental Affidavit of Doug Truslow filed in *Pee Dee Health Care* case on 11-3-2011
10. Letter from Ballard to Suggs dated 2-17-2012 filing redacted ODC complaint as an exhibit to motion for sanctions.
11. Letter from Ballard to Suggs dated 3-26-2012 filing second ODC complaint as an exhibit to motion for sanctions
12. Affidavit of Attorney Fees for Desa Ballard dated 5-11-2012 filed in *Pee Dee Health Care* case
13. Amended and Supplemental Affidavit of Desa Ballard dated 8-8-2012 filed in *Pee Dee Health Care* case.

I certify that these designations contain no matter which is irrelevant to this appeal.

  
Desa Ballard  
Ballard Watson Weissenstein  
Post Office Box 6338  
West Columbia, South Carolina 29171  
Telephone 803.796.9299  
Facsimile 803.796.1066  
Email: [desab@desaballard.com](mailto:desab@desaballard.com)

PRO SE

December 12, 2013



**Ballard  
Watson Weissenstein**  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M. Watson III  
Stephanie Weissenstein  
Attorneys at Law

Post Office Box 6338 | West Columbia, SC 29171  
226 State Street | West Columbia, SC 29169 | ph 803.796.9299 | fx 803.796.1066 | [desaballard.com](http://desaballard.com)

Thursday, December 12, 2013

*Via U.S. Mail*

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *Ex Parte Desa Ballard v. Tony R. Megna in re. Pee Dee HealthCare vs.  
Estate of Hugh S. Thompson*  
Case No. 2013-001461

Ms. Kitchings:

Enclosed for filing is an original and seven (7) copies of Ms. Ballard's Initial Brief of the Respondent Desa Ballard and the Designations of Respondent Desa Ballard which I am submitting in the above matter. Please file the originals and return a clocked-in copy of both the Initial Brief and the Designations in the enclosed self-addressed, stamped envelope. I am also enclosing our Certificate of Service.

If you should have any questions, please contact us. With kindest regards, I am,

Sincerely yours,

Mara T. Ballard, CFE, CMA  
Forensic Accountant  
[mara@desaballard.com](mailto:mara@desaballard.com)

c: (Via US Mail and Email)  
Douglas Truslow, Esquire  
James Griffin, Esquire  
Ariah King, Esquire

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CERTIFICATE OF SERVICE

I, Mara T. Ballard, the undersigned employee of Desa Ballard, PA d/b/a  
Ballard Watson Weissenstein, do certify that I have served a copy of the Initial

Brief and Designations of Respondent Desa Ballard on December 12, 2013, by causing a copy of same to be deposited in the US Mail, proper postage prepaid addressed as follows:

Mr. Douglas N. Truslow, Esquire  
Post Office Box 1465  
Columbia South Carolina 29202

James M. Griffin, Esquire  
Ariail E. King, Esquire  
Lewis Babcock & Griffin, LLP  
1513 Hampton Street  
Columbia South Carolina 29201

  
Mara T. Ballard

West Columbia, South Carolina  
December 12, 2013