

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM AIKEN COUNTY  
COURT OF COMMON PLEAS

HONORABLE DOYET A. EARLY, III, CIRCUIT COURT JUDGE

APPELLATE CASE No. 2013-001856

RECEIVED

DEC 16 2013

SC Court of Appeals

JACQUELYNE HOLLANDER,.....APPELLANT,

v.

THE IRREVOCABLE TRUST ESTABLISHED BY JAMES BROWN ON AUGUST 1,  
2000 AND RUSSELL L. BAUKNIGHT, AS TRUSTEE OF THE IRREVOCABLE TRUST  
ESTABLISHED BY JAMES BROWN ON AUGUST 1, 2000,.....DEFENDANTS,

OF WHOM RUSSELL L. BAUKNIGHT IS THE.....RESPONDENT.

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

The Respondent proposes the following to be included in the Record on Appeal:

1. Order Granting Motion to Dismiss, August 7, 2013;
2. Order Granting Motion to Dismiss, August 18, 2009;
3. Order Granting Motion to Dismiss, October 15, 2009;
4. Order Granting Motion to Dismiss, July 7, 2010;
5. Order Granting Motion to Dismiss, June 30, 2011;
6. Order Granting Motion to Dismiss, February 7, 2013;
7. Order Awarding Sanctions, August 1, 2013;
8. Transcript of July 2, 2013 Motion Hearing;
9. Complaint dated April 11, 2012;
10. Trust's Motion to Dismiss dated June 12, 2012;

11. Trust's Memorandum in Support of Motion to Dismiss dated July 2, 2013;  
and
12. Hollander's Memorandum in Opposition to Motion to Dismiss and  
Proposed Order dated July 19, 2013.

Pursuant to Rule 209(c), SCACR, the undersigned certifies that this designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,



---

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*Attorneys for Respondent*  
*Russell L. Bauknight*

December 12, 2013

Greenville, South Carolina

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ESTABLISHED BY JAMES BROWN IN AUGUST 1, 2000,..... DEFENDANTS,

OF WHOM RUSSELL L. BAUKNIGHT IS THE..... RESPONDENT.

**PROOF OF SERVICE**

I certify that I have served the Respondent's Designation of Matter To Be Included in the Record on Appeal by depositing a copy of same in the United States Mail, postage prepaid addressed to Appellant's attorney of record, O. Cyrus Hinton, Hinton and Associates, PA, Two Law Place, 235 East Main Street, Suite 110, Rock Hill, South Carolina 29730.

December 12, 2013



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**Burl F. Williams**  
Associate

December 12, 2013

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

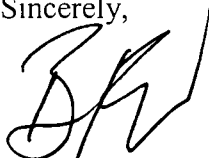
**Re: *Jacquelyne Hollander v. The Irrevocable Trust Established by James Brown* / Appellate Case No. 2013-001856**

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Respondent's Initial Brief and Respondent's Designation of Matter to be Included in the Record on Appeal in the above-referenced matter. Please file the originals and return the filed-stamped copies in the enclosed, self-addressed, stamped envelope.

By copy of this letter, I am serving Appellant's counsel with a copy of the same.

Sincerely,



Burl F. Williams

BFW:gb  
Enclosures

cc: O. Cyrus Hinton, Esquire – w/encls.

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