

RECEIVED

Jun 29 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS
THE HONORABLE COURTNEY CLYBURN POPE
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2025-000808
CIVIL ACTION NO. 2023-CP-10-02263

Jeronimo Hernandez Jimenez,

APPELLANT,

versus

Rolando Medrano,

RESPONDENT.

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

Rolando Medrano, Respondent in the above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed May 10, 2023;
2. Answer to Complaint, filed June 20, 2023;
3. Respondent's Motion for Summary Judgment, filed June 5, 2024 with attached exhibits:
 - A. Excerpts of Jeronimo Hernandez Jimenez May 20, 2024 Deposition;
 - B. Excerpts of Rolando Medrano May 20, 2024 Deposition;
 - C. Settlement Agreement;

4. Appellant's Memorandum in Opposition to the Motion for Summary Judgment, filed January 7, 2025 with attached exhibits:
 1. Map;
 2. Medical Report;
 3. April 1, 2021 Deposition of Jorge H. Ramirez;
 4. Settlement Agreement;
5. Respondent's Reply Brief in Support of Motion for Summary Judgment, filed January 20, 2025 with exhibit:
 - D. Excerpts of Jimenez May 20, 2024 Deposition;
6. Transcript of Hearing Held March 20, 2025 before The Honorable Courtney Clyburn Pope; and
7. Form 4 Order filed March 27, 2025.

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

Respectfully submitted,

/s Carmen V. Ganjehsani
Carmen V. Ganjehsani (S.C. Bar No. 73515)
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
cganjehsani@richardsonplowden.com

Payton D. Hoover
(S.C. Bar No. 75967)
RICHARDSON, PLOWDEN & ROBINSON, PA
235 Magrath Darby Blvd., Suite 100
Mt. Pleasant, South Carolina 29413
(843) 805-6550
phoover@richardsonplowden.com

Thomas Allan Bendle, Jr.
(S.C. Bar No. 69561)
HOWELL GIBSON & HUGHES, PA
PO Box 40
Beaufort, SC 29901
(843) 522-2400
tbendle@hghpa.com
Attorneys for Respondent
Rolando Medrano

June 29, 2026

RECEIVED

Jun 29 2026

SC Court of Appeals

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondent, Rolando Medrano, do hereby certify that I have this date served the foregoing Respondent's Designation of Matter to Be Included in the Record on Appeal, dated June 29, 2026, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Joshua Reece Fester
Warren Paul Johnson
Darrell T. Johnson, Jr.
LAW OFFICE OF DARRELL THOMAS JOHNSON, JR.
300 Main Street
PO Box 1125
Hardeeville, SC 29927
jfester@johnsonslawoffice.com
wpj@johnsonslawoffice.com
filing@johnsonslawoffice.com
Attorneys for Appellant

A copy of the sent email is enclosed with this Certificate of Service.

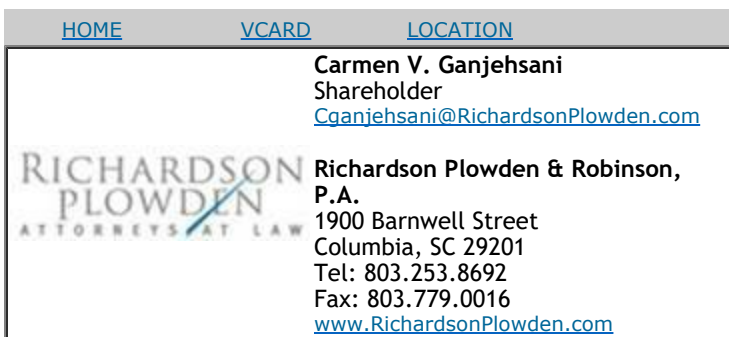
/s Carmen V. Ganjehsani
Carmen V. Ganjehsani
S.C. Bar No. 73515
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Attorneys for Respondent
Rolando Medrano

Date: June 29, 2026.

From: [Carmen Ganjehsani](#)
To: ["jfester@johnsonslawoffice.com"](#); ["wpj@johnsonslawoffice.com"](#); ["filing@johnsonslawoffice.com"](#); ["Laura McKenzie"](#)
Cc: [Payton Hoover](#); ["Thomas A Bendle, Jr."](#)
Subject: Jimenez v. Medrano Appellate Case No. 2025-000808
Date: Monday, June 29, 2026 11:16:00 AM
Attachments: [2025-000808 Jimenez v. Medrano \(Int. Res. Brief\) \(4224137\).pdf](#)
[2025-000808 Jimenez v. Medrano \(Respondent"s DOM\) \(4224136\).pdf](#)

Please find served upon you the Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal on behalf of Respondent Rolando Medrano in the above-referenced appeal.

Carmen Ganjehsani



The information contained in this e-mail message may be attorney-client privileged, attorney work product, or strictly confidential information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at (803) 771-4400 and permanently delete this e-mail.