

STATE OF SOUTH CAROLINA
IN THE SOUTH CAROLINA COURT OF APPEALS

James R. Watson, Jr.,
Appellant,

v.

Lori Lee Creel a/k/a Lori Marie Creel,
Respondent.

Appeal From Florence County Court of Common Pleas
Twelfth Judicial Circuit

Lower Court Case No. 2025-CP-21-02092
Appellate Case No.: 2024 - 201537

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Aug 13 2026

SC Court of Appeals

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

Pursuant to Rule 209, SCACR, Appellant James R. Watson, Jr., proceeding pro se, designates the following matter for inclusion in the Record on Appeal. Appellant designates only those materials relevant to the issues presented in this appeal and properly contained in the proceedings below.

I. ORDERS AND JUDGMENTS

1. **Order Granting Defendant's Motion for Summary Judgment**, electronically filed May 28, 2026, including the accompanying Form 4 Judgment.
2. **Order/Form 4 entered July 15, 2026**, denying Appellant's Rule 59(e), SCRPC, Motion to Alter or Amend Judgment and filing the Summary Judgment Order as the final order.
3. Any prior order directly concerning a motion or issue specifically raised and preserved in Appellant's Initial Brief.

II. PLEADINGS

4. Summons and Complaint in Florence County Court of Common Pleas Case No. 2025-CP-21-02092.
5. Any amended or supplemental complaint properly filed and considered by the circuit court.
6. Respondent's Answer, affirmative defenses, and other responsive pleading relevant to the claims resolved by summary judgment.

III. SUMMARY-JUDGMENT MATERIALS

7. Respondent's Motion for Summary Judgment.
8. Respondent's Affidavit submitted in support of the Motion for Summary Judgment.
9. Respondent's Memorandum in Support of Motion for Summary Judgment.
10. Appellant's Memorandum in Opposition to Respondent's Motion for Summary Judgment.
11. Appellant's Rule 56 affidavit or filing concerning incomplete discovery and the inability to obtain information Appellant contended was necessary to oppose summary judgment, to the extent properly filed in the circuit court.

IV. DISCOVERY MATERIALS RELEVANT TO SUMMARY JUDGMENT

12. Appellant's Motion to Compel Discovery.
13. Those discovery requests, certificates or proofs of service, responses, objections, and related filings necessary to determine whether discovery relevant to the issues presented on appeal remained outstanding when Respondent sought summary judgment.
14. Materials properly filed below concerning Appellant's requests for business financial information, revenue or sales information, booking and scheduling information, communications concerning termination, and other discovery specifically relied upon by Appellant in opposing summary judgment.

V. APPELLANT'S PENDING MOTIONS ADDRESSED BY THE MAY 28 ORDER

15. Appellant's Motion for Updated Damages, Medical Costs, and Lost Income, together with supporting materials properly contained in the circuit court record.
16. Appellant's Motion to Compel Compliance with Court-Ordered Screening, together with supporting materials properly contained in the circuit court record.
17. Appellant's Motion for Rule to Show Cause, together with supporting materials properly contained in the circuit court record.

18. Appellant's Motion for Contempt, together with supporting materials properly contained in the circuit court record.

VI. CERTIFIED MAY 6, 2026 HEARING TRANSCRIPT

19. The Certified Transcript of Proceedings conducted May 6, 2026, before the Honorable George M. McFaddin, Jr., and certified by Amanda Watson on August 10, 2026, including the portions of that proceeding concerning Florence County Case No. 2025-CP-21-02092.

The transcript cover identifies Case No. 2025-CP-21-02046 because the May 6 proceeding involved two related cases between the parties. The body of the certified transcript expressly reflects the circuit court's consideration of matters arising in Case No. 2025-CP-21-02092.

Appellant specifically designates the following transcript portions:

- a. **Transcript pages 13-14** — Appellant's opposition to summary judgment, Rule 56 argument, assertion that discovery remained incomplete, and identification of information Appellant contended remained in Respondent's possession.
- b. **Transcript pages 14-18** — Proceedings concerning Case No. 2025-CP-21-02092, including the court's consideration of Appellant's screening and related motions.
- c. **Transcript page 18** — The circuit court's statement concerning the Lori Lee Creel/Lori Marie Creel identity issue and its characterization of that matter as a question for a jury.
- d. **Transcript page 18** — The circuit court's consideration of Appellant's Motion for Updated Damages, Medical Costs, and Lost Income and its statement that the damages presented a question for a jury and were not for determination by the court that day.
- e. **Transcript pages 20-21** — Proceedings concerning Appellant's contempt motion and the circuit court's rulings and explanations.
- f. **Transcript pages 21-22** — Appellant's statement concerning unresolved discovery and continuing damages and the circuit court's statement that it would carefully review the parties' submissions and its hearing notes before issuing its written ruling.

VII. POST-JUDGMENT MATERIALS

- 20. Appellant's Motion to Alter or Amend Judgment pursuant to Rule 59(e), SCRCP.
- 21. Supporting memorandum, exhibits, notices, or other materials properly submitted in connection with Appellant's Rule 59(e) Motion and relevant to the issues preserved for appellate review.
- 22. Any response filed by Respondent concerning the Rule 59(e) Motion, if contained in the circuit court record.
- 23. The July 15, 2026 Order/Form 4 denying Rule 59(e) relief.

VIII. APPELLATE AND SERVICE MATERIALS

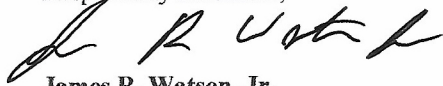
- 24. Appellant's Notice of Appeal.
- 25. Proof or Certificate of Service of the Notice of Appeal to the extent necessary to establish the procedural history or timeliness of this appeal.
- 26. Any other certificate or proof of service specifically relevant to preservation or determination of an issue presented in Appellant's Initial Brief.

CERTIFICATION PURSUANT TO RULE 209(c), SCACR

By signing this Designation, Appellant certifies pursuant to Rule 209(c), SCACR, that the matters designated above are relevant to the issues presented in this appeal.

Appellant does not seek through this Designation to introduce evidence that was not presented to the circuit court. The Designation is limited to materials properly contained in the proceedings below and necessary for appellate review.

Respectfully submitted,



James R. Watson, Jr.
Appellant, Pro Se

Date: August 13th

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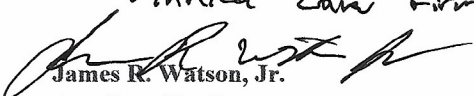
CERTIFICATE OF SERVICE

I certify that on the 13 day of August, 2026, I served a true and correct copy of the foregoing Appellant's Designation of Matter to Be Included in the Record on Appeal upon counsel of record for Respondent by:

~~REDACTED~~ US Certified Mail

at the following address:

William Joseph Edwards & Charles Benny Holbrooks III
Finklee Law Firm PO Box 1317 Florence SC 29503


James R. Watson, Jr.

Appellant, Pro Se

August 13th, 2024