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Aug 25 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Daniel Coble, Circuit Court Judge

Appellate Case No. 2025-002478  
Case No. 2018-CP-40-4850

Randle Jackson as the Personal Representative of the  
Estate of Dashaun Simmons, ..... Respondent,

v.

South Carolina Department of Corrections, ..... Appellant.

**RESPONDENT'S AMENDED DESIGNATION OF MATTER**

Respondent proposes that the following materials be included in the Record on Appeal:

1. Defendant's Motion for Protective Order, filed February 5, 2024;
2. Amended Complaint;
3. Summary Judgment Motion, filed April 7, 2023;
4. Order Denying Summary Judgment, filed December 27, 2023;
5. Order Denying Summary Judgment, filed January 2, 2024;
6. Motion for Summary Judgment or, in the Alternative, Motion to Strike SCDC's Answer, filed May 27, 2025;
7. Memorandum in Support of Motion for Summary Judgment or, in the Alternative, Motion to Strike SCDC's Answer, filed August 1, 2025;
8. Defendant's Memorandum in Support of Motion for Summary Judgment, filed August 1, 2025;
9. Defendant's Supplemental Memorandum in Support of Motion for Summary Judgment, filed August 6, 2025;
10. Order Denying Summary Judgment, filed August 7, 2025;
11. Order Denying Summary Judgment, filed August 25, 2025;
12. Defendant's Motion to Alter or Amend, filed September 4, 2025;

13. Order Denying Defendant's Motion to Alter or Amend, filed November 13, 2025;
14. Deposition of Brittney Livingston, pp. 19-20, 29-30, 60;
15. Deposition of Evan Garris, pp. 141-142, 146;
16. Deposition of Matthew Kennedy, pp. 16-17, 19, 20-22;
17. Deposition of Holden Byrd, pp. 21, 40;
18. SCDC Policy/Procedure OP 22.06;
19. Statement of Matthew Kennedy;
20. Deposition of Clinton Parker, p. 8;
21. BRCI July 17–18, 2017 Duty Roster;
22. Deposition of Anthony Hall, pp. 23-24, 110;
23. Deposition of Ulysses Collins, pp. 12-13, 15;
24. Statement of Ulysses Collins;
25. Statement of Holden Byrd; and
26. Post Order 6 – Control Room/Communications.

Respectfully submitted,

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August 25, 2026