

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Jennifer McCoy, Circuit Court Judge

Case No. 2023-CP-10-01923

JEFFREY CEPIN,..... Plaintiff,

v.

SAMET CORPORATION; METROMONT CORPORATION n/k/a METROMONT, LLC,
.....Defendants.

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

Respondent hereby proposes the following be included in the Record on Appeal:

1. Summons and Complaint filed on April 20, 2023.
2. Respondent Metromont Corporation n/k/a Metromont, LLC's Answer filed on April 26, 2023.
3. Respondent Samet Corporation's Answer filed on May 17, 2023.
4. Plaintiff Counsel's Motion to be Relieved as Counsel filed on December 5, 2023.
5. Respondent Metromont Corporation n/k/a Metromont, LLC's Motion for Summary Judgment filed on April 26, 2023.
6. Plaintiff's consent to Plaintiff Counsel's Motion to be Relieved as Counsel filed on June 28, 2024.

7. Order Granting Plaintiff Counsel's Motion to be Relieved as Counsel filed on August 27, 2024.
8. Affidavit of Jason Woodward filed on December 5, 2024.
9. Form 4 Order denying Respondent Metromont Corporation n/k/a Metromont, LLC's Motion for Summary Judgment without prejudice and setting discovery deadline.
10. Respondent Metromont Corporation n/k/a Metromont, LLC's Motion to Compel Plaintiff's Deposition Testimony.
11. Plaintiff's first deposition testimony taken on February 25, 2025.
12. Form 4 Order granting Respondent Metromont Corporation n/k/a Metromont, LLC's Motion to Compel Plaintiff's Deposition Testimony.
13. Plaintiff's second deposition testimony taken on May 2, 2025.
14. Respondent Metromont Corporation n/k/a Metromont, LLC's Motion for Summary Judgment filed on May 5, 2025.
15. Respondent Metromont Corporation n/k/a Metromont, LLC's filed certificate of service filed on May 6, 2025.
16. Respondent Metromont Corporation n/k/a Metromont, LLC's filed Memorandum in Support of its Motion for Summary Judgment filed on July 18, 2025.
17. Affidavit of Jason Woodward filed on July 21, 2025.
18. Form 4 Order continuing Respondent Metromont Corporation n/k/a Metromont, LLC's Motion for Summary Judgment filed on July 21, 2025.
19. Email correspondence to Appellant with all pleadings and his deposition transcript on August 4, 2025.
20. Hearing transcript from the September 2, 2025, Motion for Summary Judgment hearing.

21. Form 4 Order granting Respondent Metromont Corporation n/k/a Metromont, LLC's Motion for Summary Judgment filed on December 9, 2025.

22. Formal Order granting Respondent Metromont Corporation n/k/a Metromont, LLC's Motion for Summary Judgment filed on January 14, 2026.

September 4, 2026

MCANGUS GOUDELOCK & COURIE, LLC

s/Michael M. Trask

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