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**Oct 05 2026**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Appellate Case No. 2025-002480  
Circuit Court Case No. 2023-CP-10-01923

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Jeffrey Patrick Cepin,

Appellant,

v.

Samet Corporation and Metromont Corporation,

Respondents.

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

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CLEMENT RIVERS, LLP

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*Attorneys for Respondent Samet Corporation*

Respondent Samet Corporation (“Samet”) proposes the following to be included in the record on appeal (with any duplicative matter to appear in the record only once):

1. Summons & Complaint, filed April 20, 2023;
2. Metromont’s<sup>1</sup> Answer, filed April 26, 2023;
3. Samet’s Answer, filed May 17, 2023;
4. Motion to Relieve Plaintiff’s Counsel, filed December 5, 2023;
5. Renewed Motion to Relieve Plaintiff’s Counsel, filed April 3, 2024;
6. Supplement to Renewed Motion to Relieve Plaintiff’s Counsel, filed June 25, 2024;
7. Plaintiff’s Consent to Counsel Being Relieved, filed July 10, 2024;
8. Order Relieving Plaintiff’s Counsel, filed August 27, 2024;
9. Affidavit of Jason Woodard dated October 14, 2024, filed November 11, 2024;
10. Order Denying Metromont’s Motion for Summary Judgment, filed December 3, 2024;
11. Order Denying Samet’s Motion for Summary Judgment, filed December 3, 2024;
12. Order Compelling Plaintiff’s Deposition, filed April 2, 2025;
13. Metromont’s Renewed Motion for Summary Judgment, filed May 5, 2025;
14. Samet’s Renewed Motion for Summary Judgment, filed June 27, 2025;
15. Metromont’s Memo in Support of Renewed Motion for Summary Judgment, filed July 18, 2025;
  - a. Ex. A (Transcript of Plaintiff’s Deposition);
16. Affidavit of Jason Woodard dated July 21, 2025, filed July 21, 2025;

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<sup>1</sup> “Metromont” refers to Respondent Metromont Corporation.

17. Samet's Memo in Support of Renewed Motion for Summary Judgment, filed July 21, 2025;
  - a. Ex. A (Transcript of Plaintiff's Deposition);
18. Transcript of Motion Hearing Held September 2, 2025;
19. Form 4 Order Granting Metromont's Motion for Summary Judgment, filed December 9, 2025;
20. Form 4 Order Granting Samet's Motion for Summary Judgment, filed December 9, 2025;
21. Plaintiff's Notice of Appeal and Proof of Service, served/filed December 12, 2025;
22. Formal Order Granting Metromont's Motion for Summary Judgment, filed January 6, 2026;
23. Formal Order Granting Samet's Motion for Summary Judgment, filed January 8, 2026;

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

Respectfully submitted,  
CLEMENT RIVERS, LLP

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October 5, 2026