

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2013-001622

Derick Ward,

Appellant,

v.

Margaret H. Ashbaugh,

Respondent.

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

Appellant proposes the following be included in the Record on Appeal:

1. Application for Ejectment, filed March 26, 2013
2. Rule to Vacate or Show Cause, filed March 27, 2013
3. Answer, signed March 28, 2013
4. Writ of Ejectment, filed April 4, 2013
5. Notice of Civil Appeal, filed April 8, 2013
6. Bond/Undertaking to Stay Execution on Appeal to Circuit Court, filed April 11, 2013
7. Return on Appeal, filed April 11, 2013
8. Response to Civil Appeal, filed May 24, 2013
9. Order of June 7, 2013
10. Motion Under Rule 59, filed June 17, 2013
11. Order of June 28, 2013
12. Transcript of Record pp. 3-8; 10; 12-14

(Signature block on following page)

PAGE 1 OF 2

RECEIVED

JAN 21 2014

SC Court of Appeals

SOUTH CAROLINA
LEGAL SERVICES



Date: January 17, 2014

D. Elliott Tait

SC Bar No.: 100772

320 S. Coit Street

Florence, SC 29501

843-413-9500

843-413-1013 (fax)

ATTORNEY FOR APPELLANT

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2013-001622

Derick Ward,

Appellant,

v.

Margaret H. Ashbaugh,

Respondent.

RULE 209(C) CERTIFICATION

The Appellant's attorney hereby certifies that the Designation contains no matter which is irrelevant to the appeal.

Date: January 17, 2014



D. Elliott Tait
SC Bar No.: 100772
320 S. Coit Street
Florence, SC 29501
843-413-9500
843-413-1013 (fax)
ATTORNEY FOR APPELLANT

RECEIVED

JAN 21 2014

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Appellate Case No. 2013-001622

Derick Ward,

Appellant,

v.

Margaret H. Ashbaugh,

Respondent.

CERTIFICATE OF MAILING

I, D. Elliott Tait, do hereby certify that I have this date served one (1) copy of the Brief of Appellant, the Designation of the Matter to be Included in the Record on Appeal, and Rule 209(c) Certification upon the Respondent through her counsel by causing said copy to be deposited with the US Postal Service, first class postage prepaid, properly affixed hereto and addressed as follows:

Karl A. Folkens
PO Box 6139
Florence, SC 29502



D. Elliott Tait
Attorney for Appellant
Bar No.: 100772
320 South Coit Street
Florence, South Carolina 29501
(843) 413-9500 (843) 413-1013 (fax)

Signed in Florence, South Carolina
January 17, 2014

RECEIVED

JAN 21 2014

SC Court of Appeals



320 S. Coit Street, Florence, South Carolina 29501
Phone: (843) 413-9500 Fax: (843) 413-1013
www.scllegal.org | www.lawhelp.org/sc | www.probono.net/sc

January 17, 2014

Jenny Abbott Kitchings
Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

Re: Ashbaugh v. Ward
Case No. 2013-CP-21-00927

Dear Ms. Kitchings:

I hope this letter finds you well. Attached please find the original and one copy of the Brief of Appellant, Designation of the Matter, Rule 209(c) certification and Certificate of Mailing in this matter. Please file the originals and return the filed and stamped copies to me in the envelope provided.

Finally, due to the complicated and nuanced arguments in this matter, we request that the Court schedule this case for oral arguments.

Very truly yours,

D. Elliott Tait
Staff Attorney

Enclosures

RECEIVED

JAN 21 2014

SC Court of Appeals

